SFUND RECORDS CTR
88220587

SFUND RECORDS CTR
114312

114312

EPA FINAL REPORT

Purpose: Federal Facility PA Review

Site: Kaiser Eagle Mountain
Eagle Mountain, California
Riverside County

Site EPA ID Number: CA0000053090

Report Prepared By: John P. Zwierzycki

Report Reviewed By: Nate Johnson

Review/Concurrence: William E. Dentzer

Document Control No.: 62316.38.33.882 05.a.1

Report Date: August 19, 1994

Submitted To: Carolyn Douglas
EPA Region IX
Federal Facilities Coordinator

MEMORANDUM

To: Carolyn Douglas, EPA Region IX
Federal Facilities Coordinator

From: William E. Ritthaler, URS Consultants, Inc. WR

Subject: Completed Work

cc: Philip Armstrong ,EPA Region IX Work Assignment Manager
Travis Cain, EPA Region IX Project Officer
Jeri Simmons, EPA Region IX Contract Officer

Attached is the following completed:

PA: ☐ PA Review: ☐ SI: ☐ ESI: ☐

Other: Federal Facility PA Review

Site Name: Kaiser Eagle Mountain

Latitude: 33° 51' 55" North (4940)

Longitude: 115° 28' 25" West

EPA ID#: CA0000053090

City, County: Eagle Mountain, Riverside County

State Recommendation:
(for reviews only)

For EPA Use Only

EPA Further Action Determination: PA complete N

Lead Agency: Fed Fac

Sign-off Date: 8/19/94

Initials of Site Assessment Manager: cyd

Document Screening Coordinator: JMJ 8/22/94

Chief, Site Evaluation and Grants Section: [illegible] 8/22

LWong 8/26/94

1.0 Introduction

The U.S. Environmental Protection Agency (EPA), Region IX, under authority of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) and the Superfund Amendments and Reauthorization Act of 1986 (SARA), has tasked URS Consultants, Inc. (URS) to conduct a review of Federal Facility Preliminary Assessment (PA) documentation at the Kaiser Eagle Mountain site.

The Kaiser Eagle Mountain site was identified as a potential hazardous waste site and entered into the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) on November 15, 1993 (1). The site was brought to EPA's attention when a citizens' group forwarded information regarding the site to EPA. A PA-level evaluation of the Kaiser Eagle Mountain site was performed for EPA in April 1994 by the California Environmental Protection Agency, Department of Toxic Substances Control (Cal-EPA DTSC) (2). The purpose of the PA was to review existing information on the site and its environs to assess the threat(s), if any, posed to public health, welfare, or the environment, and to determine if further investigation under CERCLA/SARA is warranted. After reviewing the PA, EPA decided that further investigation of Kaiser Eagle Mountain would be necessary to more completely evaluate the site using EPA's Hazard Ranking System (HRS) criteria. The HRS assesses the relative threat associated with actual or potential releases of hazardous substances from sites. It is the principal mechanism EPA uses to place sites on the National Priorities List (NPL). The NPL identifies sites at which EPA may conduct remedial response actions. This report is the result of URS' evaluation of the submitted data.

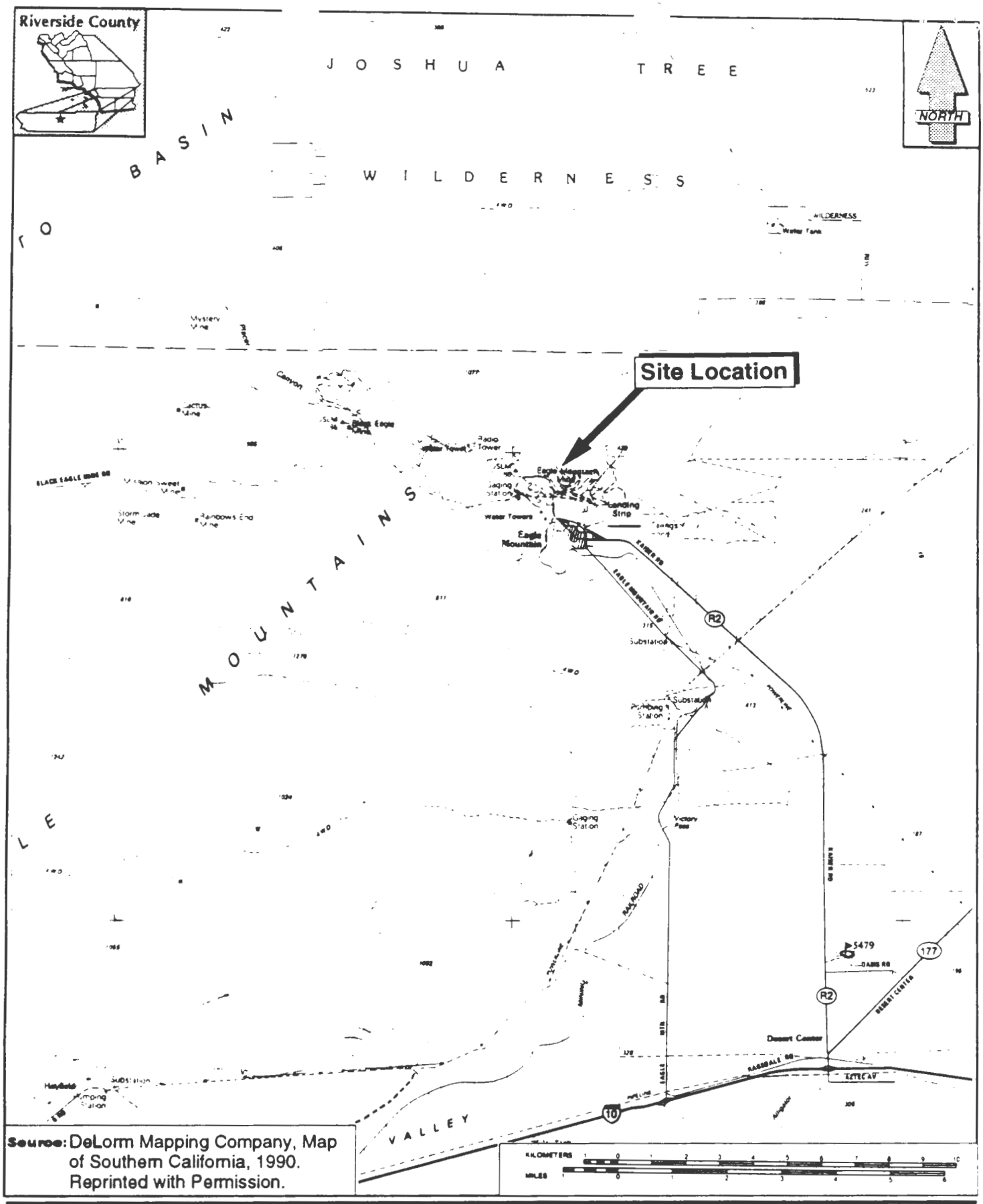
2.0 Site Description

The Kaiser Eagle Mountain site occupies 4,686 acres, of which approximately 3,271 acres are administered by the Department of Interior, Bureau of Land Management (BLM). The site is located in the Mojave Desert, in Riverside County, California, adjacent to the community of Eagle Mountain. The geographic coordinates of the site are Latitude 33° 51' 55" North, Longitude 115° 28' 25" West, Township 3 South, Range 14 East, Section 36, San Bernardino Baseline and meridian. The site is located approximately 5 miles north of Desert Center, California, and about 12 miles northeast of the Salton Sea (see Figure 1, Site Location Map) (3,4,5)

The Kaiser Eagle Mountain mine consists of three large open pits, each of which are approximately 1 to 2 miles long, 2,000 feet wide, and 400 to 800 feet deep. Mining activities have resulted in the creation of large stockpiles of mining spoils adjacent to the open pits (2,5).

3.0 Operational History and Waste Characteristics

The Kaiser Eagle Mountain site was acquired by Kaiser Steel Corporation in 1944. The production of iron ore from the site began in 1948. The mine provided blast furnace feed for Kaiser's Fontana, California steel mill. The closure of Kaiser's Fontana mill caused Kaiser to cease operations at the Eagle Mountain Mine in 1983. On February 11, 1987, Kaiser Steel filed bankruptcy due to problems at the Fontana mill site. In 1988, the Kaiser Eagle Mountain site was organizationally separated from the Fontana mill site and is now the property of Kaiser Resources, Inc. (2).



Source: DeLorm Mapping Company, Map of Southern California, 1990. Reprinted with Permission.

URS Consultants
100 California Street
San Francisco, CA 94111
August 14, 1994

Site Location Map

Kaiser Eagle Mountain
Eagle Mountain, California
Riverside County

FIGURE

1

Mining operations at Kaiser Eagle Mountain included ore and overburden removal, and ore processing. Ore and overburden removal operations consisted of first blasting to loosen deposits, then loading ores into trucks and rail cars. Hazardous wastes related to ore and overburden removal operations include waste oils and solvents that are associated with vehicle maintenance, and polychlorinated biphenyls (PCBs) used in electrical transformers that supplied energy to electric shovels, metal separators, and other equipment. Hazardous wastes are stored on property adjacent to mine pits that are owned by Kaiser Resources Inc., prior to their transportation to a designated recycling or disposal facility (2,5).

Ore processing operations included blending operations to produce concentrated ores. The purpose of ore processing at the site was to separate iron-bearing minerals from the non-iron-bearing minerals without changing their chemical nature, and then to pelletize the concentrated ore for ease of handling and proper smelting characteristics. Mineral separation was completed by magnetic separation. No acids or hazardous chemicals were used to process the ores (2).

Hazardous waste generated at this site included grease, oils, solvents, and PCBs from decommissioned transformers. During the decommissioning period between 1983 and 1987, Kaiser entered into contract with numerous vendors for equipment salvaging and dismantling of the mine infrastructure. Kaiser currently continues to operate a fleet of vehicles that generate hazardous waste, such as waste oil and solvents from routine vehicle maintenance. Vehicles are used for general site upkeep and maintenance. Hazardous waste is placed in drums and containers and stored on property owned by Kaiser Resources Inc. prior to transportation to a designated recycling or disposal facility (2).

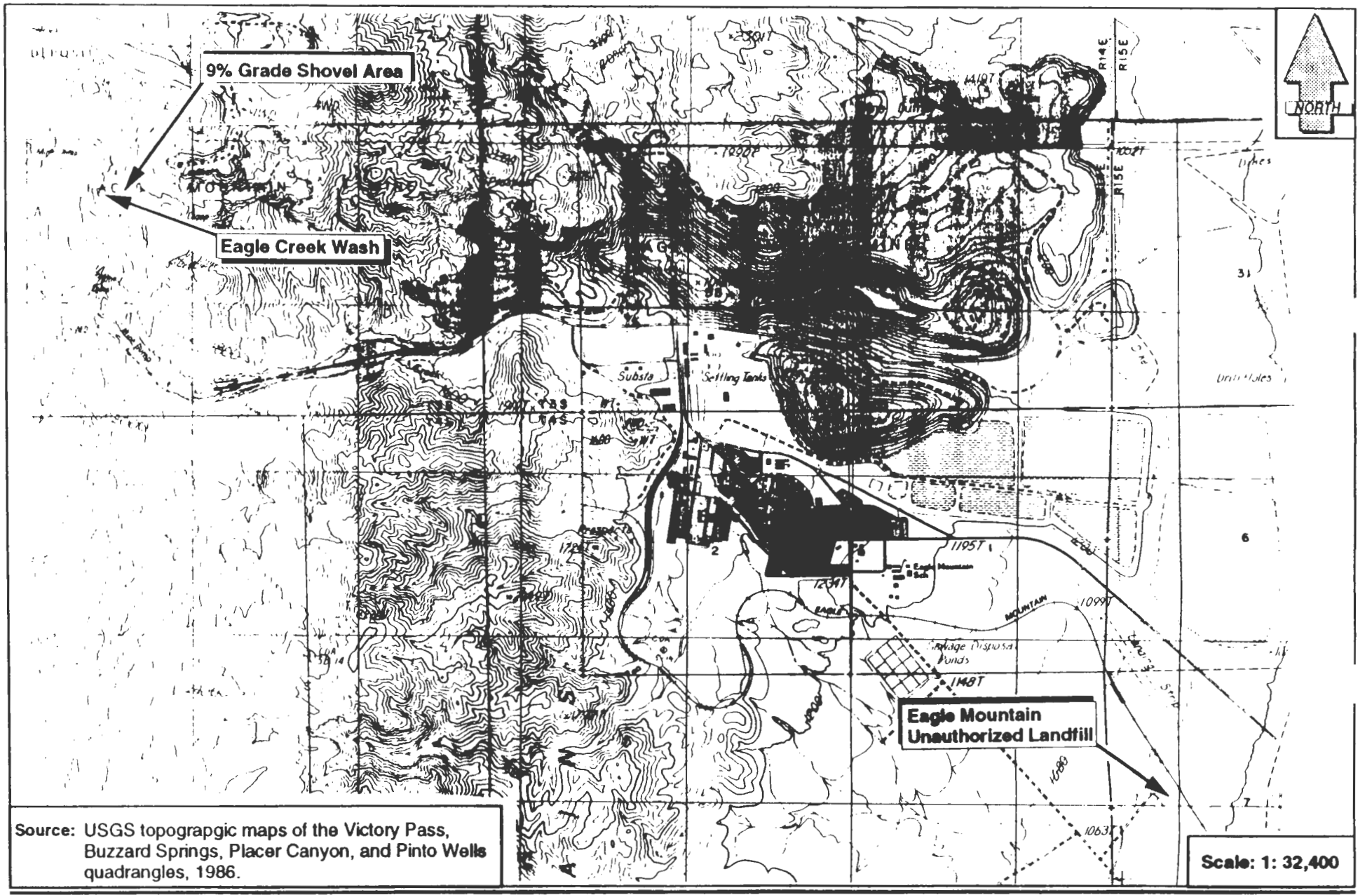
Sampling of the site was conducted by Cal-EPA DTSC in January of 1994. Cal-EPA DTSC collected nine soil samples from areas where alleged hazardous waste disposals occurred. Two of these areas, the 9% grade shovel area and the Eagle Creek Wash area, are located on public lands (see Figure 2, Facility Map). Soil samples were collected at depths ranging from 3 to 15 inches below ground surface (bgs) (2,6).

In addition to potential sources of contamination associated with mine operations, one potential source of contamination, the Eagle Mountain Unauthorized Landfill, is also located on BLM lands approximately 4 miles from the 9% grade shovel area and the Eagle Creek Wash (see Figure 2, Facility Map). This potential source of contamination was not inspected by Cal-EPA DTSC in January of 1994 (2,6).

The potential sources of contamination at Kaiser Eagle Mountain include the following:

9% Grade Shovel Area

The 9% Grade Shovel Area was used as an electric shovel servicing area, according to Mr. Lowell Ball, a member of the Concerned Citizens of the Chuckwalla Valley. The 9% Grade Shovel Area is approximately 700 feet long by 400 feet wide. It is not known what type of wastes were generated at this location or how wastes were disposed of. Two soil samples were collected from a depth of 10 inches bgs at the north and south ends of this area during the January 27, 1994 inspection by Cal-EPA DTSC. Soil samples were analyzed for metals and semi-volatile organic compounds by EPA-accepted analytical methods. Results of analysis did not reveal the presence of semi-volatile organic compounds. Metal concentrations detected in samples collected from this area were not three times greater



Source: USGS topograpgic maps of the Victory Pass, Buzzard Springs, Placer Canyon, and Pinto Wells quadrangles, 1986.

URS Consultants
100 California Street
San Francisco, CA 94111
August 15, 1994

Facility Map

Kaiser Eagle Mountain
Eagle Mountain California
Riverside County

FIGURE

2

than the mean concentration of all the nine samples collected by Cal-EPA DTSC in January 1994 for any given species of metal (2,7).

Eagle Creek Wash

Eagle Creek Wash was observed to contain an area of stressed vegetation during the Cal-EPA DTSC inspection of the 9% Grade Shovel Area. The area of stressed vegetation comprised a circle approximately 10 feet in diameter. The area was inspected for buried containers with a magnetometer (metal detector). Soil from this area was also screened for organic vapors. Neither buried containers or ogranic vapors were detected during this investigation. A soil sample was collected from 10 inches bgs from the area of stressed vegetation and analyzed for metals, volatile organic compounds, and semi-volatile organic compounds by EPA-accepted analytical methods. Results of analysis of the soil sample revealed the presence of toluene at 37 micrograms per kilogram (µg/Kg), and p-isopropyl toluene at 170 µg/Kg. Metals concentrations detected in samples collected from this area were not three times greater than the mean concentration of the nine samples collected by Cal-EPA DTSC in January 1994 for any given species of metal. Background sampling was not conducted as part of this sampling event. Concentrations of contaminants found in soils in Eagle Creek Wash do not exceed health-based benchmark concentrations (2,7).

Eagle Mountain Unauthorized Landfill

The Eagle Mountain Unauthorized Landfill is located on an estimated 2 acres of BLM lands approximately 1.5 miles southeast of the community of Eagle Mountain. The Eagle Mountain Unauthorized Landfill is approximately 4 miles from the 9% Grade Shovel Area and the Eagle Creek Wash Area. The Eagle Mountain Unauthorized Landfill was operated by Kaiser Steel Corporation and used as a municipal landfill by residents of the community of Eagle Mountain. Limited documentation is available regarding this potential source of contamination. According to Mr. Orlow Anderson, the landfill was closed in 1973. According to Mr. Robert Dale, the landfill occasionally caught fire. There have been no known sampling events conducted at this potential source of contamination (8).

4.0 HRS Considerations

The groundwater pathway is not a primary pathway of concern at the Kaiser Eagle Mountain site. Groundwater within 4 miles of the site is used primarily for irrigation in the community of Eagle Mountain. Eagle Mountain currently uses bottled water as its source of drinking water. Bottled water is supplied from a purveyor located in Blythe, California, approximately 45 miles east of the site (7).

The surface water pathway is not a primary pathway of concern at the Kaiser Eagle Mountain site. Surface water downgradient of the site is not used as a source of drinking water or as a fishery. There are no known sensitive environments located within 15 miles downstream of the site (4,5).

The soil exposure pathway is a pathway of concern at the Kaiser Eagle Mountain Site. According to Jan Roberts of Kaiser Resources, there are approximately 1,000 people, including approximately 425 inmates located at a state prison, living in the Community of Eagle Mountain; however, the community is located on BLM lands greater than 1 mile from potential sources of contamination. Terrestrial sensitive species that potentially

have habitats on areas of observed contamination at the Kaiser Eagle Mountain site include the desert tortoise (Gopherus agassizii), a State and Federal threatened species (9,10).

The air pathway is not a pathway of concern at the site. There is no documentation of a release of hazardous substances to ambient air from the site. There are approximately 1,000 people currently living within 4 miles of potential sources of contamination. Sensitive species located within 4 miles of potential sources of contamination include the desert tortoise (Gopherus agassizii), the foxtail cactus (Escobaria vivipara var Alversonii), and the California ditaxis (Ditaxis Californiaica). The desert tortoise is a State and Federal Threatened Species. The foxtail cactus and California ditaxis are under review as to their Federal endangered or threatened status (9,10).

5.0 Current Condition of the Site

The Kaiser Eagle Mountain facility is a formerly active open pit iron ore mine and processing facility. The Kaiser Eagle Mountain site occupies 4,686 acres, of which approximately 3,271 acres are administered by the BLM. A proposal to convert the "East Pit" of the mine into a Class III municipal landfill is being considered. The conversion to a landfill would include a land exchange between Kaiser Resources Inc. and the BLM. There are no plans to further investigate potential sources of contamination located at the site (5,6).

6.0 Summary and Conclusion

The Kaiser Eagle Mountain site occupies 4,686 acres, of which approximately 3,271 acres are administered by the Department of Interior, Bureau of Land Management. The site is located in the Mojave Desert, in Riverside County, California.

The Kaiser Eagle Mountain site was acquired by Kaiser Steel Corporation in 1944. The production of iron ore from the site began in 1948. The mine provided blast furnace feed for Kaiser's Fontana, California steel mill. The closure of Kaiser's Fontana mill caused the Eagle Mountain Mine to stop operating in 1983. On February 11, 1987, Kaiser Steel filed bankruptcy due to problems at the Fontana mill site.

Hazardous wastes associated with the Kaiser Eagle Mountain site include waste oils and solvents that are associated with vehicle maintenance, and polychlorinated biphenyls (PCBs) used in electrical transformers that supplied energy to electric shovels, metal separators, and other equipment. Hazardous wastes are stored on property owned by Kaiser Resources Inc., prior to their transportation to a designated recycling or disposal facility.

The following are the HRS factors pertinent to the Kaiser Eagle Mountain site:

- Groundwater within 4 miles of the site is not used as a source of drinking water.
- Surface water within 15 miles downstream of the site is not used as a source of drinking water.
- There are approximately 1,000 people residing within 4 miles of potential sources of contamination on-site.

REMEDIAL SITE ASSESSMENT DECISION - EPA REGION IX

Site Name: Kaiser Eagle Mountain **EPA ID #:** CA0000053090

Alias Site Names: Eagle Mountain Mine

City: Eagle Mountain **County or Parish:** Riverside **State:** CA

Refer to Report Dated: August 19, 1994 **Report Type:** Federal Facility PA Review

Report developed by: URS Consultants, Inc.

DECISION:

☒ **1. Further Remedial Site Assessment under CERCLA (Superfund) is not required because:**

☒ 1a. Site does not qualify for further remedial site assessment under CERCLA (Site Evaluation Accomplished - SEA)

☐ 1b. Site may qualify for further action, but is deferred to: ☐ RCRA ☐ NRC

☐ **2. Further Assessment Needed Under CERCLA**

2a. (optional) Priority: ☐ Higher ☐ Lower

2b. Activity Type ☐ PA ☐ ESI ☐ SI ☐ HRS evaluation

☐ Other_____

DISCUSSION/RATIONALE:

Report Reviewed and Approved by:_____ **Signature:** Carolyn J. Douglas **Date:** 8/19/94

Site Decision Made by:_____ **Signature:** Carolyn J. Douglas **Date:** 8/19/94

References

1. U.S. Environmental Protection Agency (EPA), Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) database, February 15, 1994.

2. California Environmental Protection Agency, Department of Toxic Substances Control (Cal-EPA DTSC), *Complaint Inspection and Sampling Report*, April 7, 1994.

3. U.S. Geological Survey, Topographic Map of the Victory Pass 7.5 minute quadrangle, 1986.

4. U.S. Geological Survey, Topographic Map of the Buzzard Springs 7.5 minute quadrangle, 1986.

5. U.S. Department of the Interior Bureau of Land Management (BLM) and Riverside County, *Final Environmental Impact Statement/Environmental Impact Report for the Proposed Eagle Mountain Landfill Project*, June 1992.

6. Key, John, BLM, and John P. Zwierzycki, URS Consultants, Inc. (URS), telephone conversation, August 15, 1994.

7. Anderson, Orlow, Site Manager, Mine Reclamation Corporation, and John P Zwierzycki, URS, telephone conversation, August 15, 1994.

8. Dale, Robert, former employee, Kaiser Steel Corporation, and John P. Zwierzycki, URS, telephone conversation, August 15, 1994.

9. Roberts, Jan, Director of Eagle Mountain Operations, Kaiser Resources Inc. and John P. Zwierzycki, URS, telephone conversation, August 13, 1994.

10. California Department of Fish and Game, California Natural Diversity Data Base, printout for the Victory Pass, Pinto Wells, Buzzard Springs, and Placer Canyon quadrangles, 1991.

Appendix A
Contact Log

Contact Log

Facility Name: **Kaiser Eagle Mountain**
Facility ID#: **CA0000053090**

Contact	Affiliation	Phone #	Date	Information
Orlow Anderson	Mine Reclamation Inc.	(619) 392-4308	8/12/94	Mr. Anderson stated that the community of Eagle Mountain uses imported bottled water for drinking water. Eagle Mountain formerly piped water from nearby springs for drinking.
Jan Roberts	Kaiser Resources Inc.	(619) 392-4341	8/12/94	Ms. Roberts is the Director of Eagle Mountain Operations for Kaiser Resources Inc. Ms. Roberts stated that there are approximately 1,000 people currently residing in the community of Eagle Mountain, including 425 inmates at the state prison. Riverside County Environmental Health Department is the lead agency for cleanups at the site. Historical mining operations used black powder for blasting. Hazardous materials were not used in processing ores.
John Key	U.S. Department of Interior, Bureau of Land Management (BLM)	(909) 697-5383	8/15/94	Mr. Key stated that of all the potential sources of waste mentioned in the Complaint Inspection and Sampling Report, only the 9% Grade Shovel Area and the Eagle Creek Wash Area are located on BLM lands. Additionally, an unauthorized landfill is located on BLM lands just south of an airstrip. It is believed that the unauthorized landfill closed in the 1970s. Landfill operations may have included burning of wastes.

Contact Log (Cont)

Facility Name: **Kaiser Eagle Mountain**
Facility ID#: **CA0000053090**

Contact	Affiliation	Phone #	Date	Information
Orlow Anderson	Mine Reclamation Inc.	(619) 392-4308	8/15/94	Mr. Anderson stated that the 9% Grade Shovel Area is approximately 700 feet long and approximately 400 feet wide. The Eagle Creek area is a circle approximately 10 feet in diameter. The unauthorized landfill was active until 1973. The landfill was used for municipal waste and construction debris. Occasionally the landfill was set on fire.
Robert Dale	formerly with Kaiser Steel Corporation.	(619) 747-5093	8/15/94	Mr. Dale stated that the Eagle Mountain Unauthorized Landfill is approximately 2 acres in area. This disposal site was operated by Kaiser Steel. Wastes at the site were covered with soil on a regular basis. The site occasionally caught fire.

Appendix B
Latitude/Longitude Worksheet

LATITUDE AND LONGITUDE CALCULATION WORKSHEET
#1
WHEN USING CUSTOM RULER OR COORDINATOR (TM)

SITE: Kaiser Eagle Mountain NUMBER: CA0000053090

AKA: Eagle Mountain Mine SSID: _____

ADDRESS: _____

CITY: Eagle Mountain STATE: CA ZIP CODE: 92239

SITE REFERENCE POINT: deepest part of westernmost pit

TOPO MAP Victory Pass TOWNSHIP: 3 South RANGE: 14 East

SCALE: 1:24,000 MAP DATE: 1987 SECTION: 36 1/4 ____ 1/4 ____ 1/4 ____ 1/4

MAP DATUM: ☐ 1927 ☒ 1983 MERIDIAN: San Bernardino

COORDINATES FROM LOWER RIGHT (SOUTHEAST) CORNER OF 7.5' MAP:

LONGITUDE: 115° 22' 30" LATITUDE: 33° 45' 00"

COORDINATES FROM LOWER RIGHT (SOUTHEAST) CORNER OF 2.5 SUB-MAP:

LONGITUDE: 115° 27' 30" LATITUDE: 33° 50' 00"

CALCULATIONS: LATITUDE (7.5 MINUTE QUADRANGLE MAP)

A) ALIGN THE BOTTOM OF THE SCALE WITH BOTTOM OF GRID. ALIGN THE TOP OF THE SCALE WITH THE TOP OF GRID. POSITION EDGE OF RULER OVER SITE REFERENCE POINT WHILE KEEPING TOP AND BOTTOM ALIGNED.

B) READ TICS ON RULER AT 1OR 0.5 SECOND INTERVALS. (INTERPOLATE IF POSSIBLE)

1' 55"

C) RECORD LATITUDE: 33° 51' 55" N

CALCULATIONS: LONGITUDE (7.5 MINUTE QUADRANGLE MAP)

A) ALIGN THE BOTTOM OF THE SCALE WITH THE RIGHT SIDE OF GRID. ALIGN THE TOP OF THE SCALE W ITH THE LEFT SIDE OF GRID. POSITION EDGE OF RULER OVER SITE REFERENCE POINT WHILE KEEPING TOP AND BOTTOM ALIGNED.

B) READ TICS ON RULER AT 1 SECOND INTERVALS. (INTERPOLATE IF POSSIBLE)

00' 55"

C) RECORD LONGITUDE: 115° 28' 25" W

INVESTIGATOR: John P. Zwierzycki DATE: 8/11/94

EPA Potential Hazardous Waste Site Preliminary Assessment Form

Identification

State:	CERCLIS Number
CA	CA0000053090

CERCLIS Discover Date: 11/15/93

1. General Site Information

Name: Kaiser Eagle Mountain		Street: N/A	
City: Eagle Mountain		State: CA	Zip Code: 92239	County: Riverside
Latitude: 33° 51' 55" North Longitude: 115° 28' 25" West	Approximate Area of Site: 3,271 Acres 142,484,760 Square Ft.	Status of Site: ☐ Active ☐ NA ☐ Inactive ☒ Not Specified	County Code: 065 Cong. Dist.: 37

2. Owner/Operator Information

Owner:	Operator:
Bureau of Land Management	Bureau of Land Management
Street: 63-500 Garnet Avenue	Street: 63-500 Garnet Avenue
City: North Palm Springs	City: North Palm Springs
State: CA; Zip Code: 92258; Telephone: (619) 232-4421	State: CA; Zip Code: 92258; Telephone: (619) 232-4421

Type of ownership

- ☐ Private
- ☒ Federal Agency
- ☐ State
- ☐ Indian
- ☐ County
- ☐ Municipal
- ☐ Not Specified
- ☐ Other

How Initially Identified

- ☒ Citizen Complaint
- ☐ PA Petition
- ☐ State/Local Program
- ☐ RCRA/CERCLA Notification
- ☐ Federal Program
- ☐ Incidental
- ☐ Not Specified
- ☐ Other

3. Site Evaluator Information

Evaluator: John P. Zwierzycki	Agency/Organization: URS Consultants	Date Prepared: 8/16/94
Street: 100 California Street	City: San Francisco	State: California
Name of EPA or State Agency Contact: Carolyn Douglas	Street: 75 Hawthorne Street	
City: San Francisco	State: California	Telephone: (415) 744-2345

4. Site Disposition (for EPA use Only)

Emergency Response/Removal Assessment Recommendations	CERCLIS Recommends:	Signature:
☐ Yes ☐ No ☐ Date:	☐ Higher Priority SI ☐ Lower Priority SI ☒ NFRAP ☐ RCRA ☐ Other ☐ Date:	Carolyn J. Douglas Names (typed) Position: SAM

CERCLIS Number: CA0000053090

5. General Site Characteristics

Predominant Land Uses Within 1 Mile of Site (Check all that apply):

- ☒ Industrial
- ☐ Commercial
- ☒ Residental
- ☐ Forest/Fields
- ☐ Agriculture
- ☒ Mining
- ☐ DOD
- ☐ DOE
- ☒ DOI
- ☐ Other Federal Facility
- ☐ Other

Site Setting:

- ☐ Urban
- ☐ Suburban
- ☒ Rural

Years of Operation:

Beginning Year 1948

Ending Year 1983

☐ Unknown

Type of Site Operations (Check all that apply):

- ☐ Manufacturing
  - ☐ Lumber and Wood Products
  - ☐ Inorganic Chemicals
  - ☐ Plastic and/or Rubber Products
  - ☐ Paints, Varnishes
  - ☐ Industrial Organic Chemicals
  - ☐ Agricultural Chemicals (e.g., pesticides, fertilizers)
  - ☐ Miscellaneous Chemical Products (e.g., adhesives, explosives, ink)
  - ☐ Primary Metals
  - ☐ Metal Coating, Plating, Engraving
  - ☐ Metal Forging, Stamping
  - ☐ Fabricated Structural Metal Products
  - ☐ Electronic Equipment
  - ☐ Other Manufacturing
- ☒ Mining
  - ☒ Metals
  - ☐ Coal
  - ☐ Oil and Gas
  - ☐ Non-metalic Minerals
- ☐ Retail
- ☐ Recycling
- ☐ Junk/Salvage Yard
- ☐ Municipal Landfill
- ☐ Other Landfill
- ☐ DOD
- ☐ DOE
- ☒ DOI
- ☐ Other Federal Facility
- ☐ RCRA
  - ☐ Treatment, Storage, or Disposal
  - ☐ Large Quantity Generator
  - ☐ Small Quantity Generator
  - ☐ Subtitle D
    - ☐ Municipal
    - ☐ Industrial
  - ☐ "Converter"
  - ☐ "Protective Filer"
  - ☐ "Non- or Late Filer"
- ☐ Not Specified
- ☐ Other _____

Waste Generated:

- ☒ Onsite
- ☐ Offsite
- ☐ Onsite and Offsite

Deposition Authorized:

- ☐ Present Owner
- ☐ Former Owner
- ☐ Present and Former Owner
- ☒ Unauthorized
- ☐ Unknown

Waste Accessible to the Public:

- ☒ Yes
- ☐ No

Distance to Nearest Dwelling, School, or Workplace:

8,100 Feet

6. Waste Characteristics Information

Source Type: (Check all that apply)	Source Waste Quantity (include units)	Tier *:
☒ Landfill	2 acres	A
☐ Surface Impoundment		
☐ Drums		
☐ Tanks and non-Drum Containers		
☐ Chemical Waste Pile		
☐ Scrap Metal or Junk Pile		
☐ Tailings Pile		
☐ Trash Pile (open dump)		
☐ Land Treatment		
☐ Contaminated Ground Water Plume (unidentified source)		
☐ Contaminated Surface Water/Sediment (unidentified source)		
☒ Contaminated Soil	100 square feet	A
☐ Other: _____		
☐ No Sources		

* C = Constituent, W = Wastestream, V = Volume, A = Area

General Types of Waste (check all that apply):

- ☐ Metals
- ☒ Organics
- ☐ Inorganics
- ☒ Solvents
- ☐ Paints/Pigments
- ☐ Laboratory/Hospital Waste
- ☐ Radioactive Waste
- ☒ Oily Waste
- ☐ Pesticides/Herbicides
- ☐ Acids/Bases
- ☐ Construction/Demolition Waste
- ☒ Municipal Waste
- ☐ Mining Waste
- ☐ Explosives
- ☐ Other

Physical State of Waste as Deposited (check all that apply):

- ☒ Solid
- ☒ Liquid
- ☐ Sludge
- ☐ Gas
- ☐ Powder

CERCLIS Number:
CA0000053090

7. Ground Water Pathway

Is Ground Water Used for Drinking Water Within 4 Miles:

☐ Yes
☒ No

Type of Drinking Water Wells Within 4 Miles (Check all that apply)

☐ Municipal
☐ Private
☒ None

Depth to Shallowest Aquifer:

N/A Feet

Karst Terrain/Aquifer Present:

☐ Yes
☒ No

Is There a Suspected Release To Groundwater?

☐ Yes
☒ No

Have Primary Target Drinking Water Wells Been Identified

☐ Yes
☒ No

If Yes, Enter Primary Target Population:

0 People

Nearest Designated Wellhead Protection Area:

☐ 0 - 1/4 Mile
☐ >1/4 Mile - 4 Miles
☒ None Within 4 Miles

List Secondary Target Population Served by Ground Water Withdrawn From:

0 - 1/4 Mile	0
> 1/4 - 1/2 Mile	0
> 1/2 - 1 Mile	0
> 1 - 2 Miles	0
> 2 - 3 Miles	0
> 3 - 4 Miles	0
Total Within 4 Miles	0

8. Surface Water Pathway

Type of Surface Water Draining Site and 15 Miles Downstream (Check all that apply)

☒ Stream ☐ River ☐ Pond ☐ Lake
☐ Bay ☐ Ocean ☐ Other_____

Shortest Overland Distance From Any Source to Surface Water:

50 Feet

0.01 Miles

Is There a Suspected Release to Surface Water?

☐ Yes
☒ No

Site is Located in:

☐ Annual - 10 yr Floodplain
☐ > 10 yr - 100 yr Floodplain
☐ > 100 yr - 500 yr Floodplain
☒ > 500 yr Floodplain

Drinking Water Intakes Located Along the Surface Water Migration Path:

☐ Yes
☒ No

Have Primary Target Drinking Water Intakes Been Identified:

☐ Yes
☒ No

If Yes, Enter Population Served by Primary Target Intakes:

_____ People

List All Secondary Target Drinking Water Water Intakes:

Name	Water Body	Flow (cfs)	Population Served

Total within 15 Miles _____

Fisheries Located Along the Surface Water Migration Path:

☐ Yes
☒ No

Have Primary Target Fisheries Been Identified:

☐ Yes
☒ No

List All Secondary Target Fisheries:

Waterbody/Fishery Name	Flow (cfs)

CERCLIS Number:
CA0000053090

8. Surface Water Pathway (continued)

Wetlands Located Along the Surface Water Migration Path:

☐ Yes
☒ No

Have Primary Target Wetlands Been Identified:

☐ Yes
☒ No

List Secondary Target Wetlands:

Water Body	Flow (cfs)	Frontage Miles

Other Sensitive Environments Located Along the Surface Water Migration Path:

☐ Yes
☒ No

Have Primary Sensitive Environments Been Identified:

☐ Yes
☒ No

List Secondary Target Sensitive Environments:

Water Body	Flow (cfs)	Sensitive Environment Type

9. Soil Exposure Pathway

Are People Occupying or Attending School or Day Care on or Within 200 Feet of Areas of Known or Suspected Contamination:

☐ Yes
☒ No

If Yes, Enter total Resident Population:

_____ People

Number of Workers Onsite

☐ None
☒ 1 - 100
☐ 101 - 1,000
☐ > 1,000

Have Terrestrial Sensitive Environments Been Identified on or Within 200 Feet of the Site.

☒ Yes
☐ No

If Yes, List Each Terrestrial Sensitive Environment:

Desert Tortoise

10. Air Pathway

Is There a Suspected Release to Air:

☐ Yes
☒ No

Enter Total Population on or Within:

Onsite	0
0 - 1/4 Mile	0
> 1/4 - 1/2 Mile	0
> 1/2 - 1 Mile	0
> 1 - 2 Miles	800
> 2 - 3 Miles	200
> 3 - 4 Miles	0
Total Within 4 Miles	1,000

Wetlands Located Within 4 miles of the Site:

☐ Yes
☒ No

Other Sensitive Environments Located Within 4 Miles Of The Site:

☒ Yes
☐ No

List All Sensitive Environments Within 1/2 Mile of the Site:

Distance	Sensitive Environmental Type/Wetlands Area (acres)
Onsite	Desert Tortoise
0 - 1/4 Mile	
> 1/4 Mile - 1/2 Mile	

Sent 8/30/94

MEMORANDUM

To: Carolyn Douglas, EPA Region IX
Federal Facilities Coordinator

From: William E. Ritthaler, URS Consultants, Inc. WR

Subject: Transmittal List for Kaiser Eagle Mountain
Federal Facility PA Review
EPA I.D. No.: CA0000053090

URS suggests that the following persons/agencies receive a copy of the document referenced above:

- Bureau of Land Management
  6221 Box Springs Boulevard
  Riverside, California 92507
  Attn: John Key

- California Regional Water Quality Control Board
  73-271 Highway 111
  Route 21
  Palm Desert, California 92260
  Attn: Robert Perdue

- California Environmental Protection Agency
  Department of Toxic Substances Control
  245 W. Broadway, Suite 350
  Long Beach, California 90802
  Attn: Richard Hubbell

- Kaiser Resources Inc.
  P.O. Box 37
  Desert Center, California 92239
  Attn: Jan Roberts

MEMORANDUM

DATE: November 15, 1993

SUBJECT: CERCLIS Discovery

FROM: Jim Quint (H-8-1)

TO: Applied Technology Associates

Pleas enter a Discovery as of 11/15/93 for the following site. It is a Federal site an an EPA lead.

CA0000053090
Kaiser Eagle Mountain
N of HWY 10 8 M off Kaiser Rd
Desert Center CA 92239
Riverside County

File

*** REPORT FOR INDIVIDUAL SITE ***

WAM/SAM : OPEN
CONTRACTOR : PA
SITE NAME : KAISER EAGLE MOUNTAIN

CA0000053090	KAISER EAGLE MOUNTAIN	N OF HWY 10 8M OFF KAISER RD
EPA ID NO.	SITE NAME	ADDRESS 1
PA		
CONTRACTOR		
	PROJ MANGR	
	OPEN	
	WAM/SAM	
		ADDRESS 2
	TELEPHONE NO.	DESERT CENTER / CA
		CITY / ST
FF		92239-0000
LEAD		ZIP

EVENT TYPE	START DATE	DUE DATE	REVISE DATE	COMPLETE DATE	EPA DECISION	EPA DATE
DS1	/ /	/ /	/ /	11/15/93		/ /
	/ /	/ /	/ /	/ /		/ /
	/ /	/ /	/ /	/ /		/ /
	/ /	/ /	/ /	/ /		/ /
	/ /	/ /	/ /	/ /		/ /
	/ /	/ /	/ /	/ /		/ /
	/ /	/ /	/ /	/ /		/ /
	/ /	/ /	/ /	/ /		/ /

<< COMMENTS >>

Kaiser Eagle Mountain
LATITUDE 33:51:55 LONGITUDE 115:28:25 1980 POPULATION

	SECTOR						
KM	0.00-.400	.400-.800	.800-1.61	1.61-3.22	3.22-4.83	4.83-6.44	TOTALS
S 1	0	0	0	0	0	0	0
S 2	0	0	0	0	0	0	0
S 3	0	0	0	0	0	0	0
S 4	0	0	0	0	0	0	0
S 5	0	0	0	0	0	0	0
S 6	0	0	0	0	0	0	0
S 7	0	0	0	0	0	0	0
S 8	0	0	0	0	0	0	0
S 9	0	0	0	0	0	0	0
S10	0	0	969	921	0	0	1890
S11	0	0	0	0	0	0	0
S12	0	0	0	0	0	0	0
S13	0	0	0	0	0	0	0
S14	0	0	0	0	0	0	0
S15	0	0	0	0	0	0	0
S16	0	0	0	0	0	0	0
RING TOTALS	0	0	969	921	0	0	1890

EAGLE MOUNTA[redacted]LANDFILL - Riversid[redacted]County

CA0000052090 - Latitude: 33 42 48 Longitude: 115 24 12[redacted]

PRODUCED BY: USEPA Region 9, IRM Branch, GIS Center

PRODUCED FOR: USEPA Region 9, Hazardous Waste Management Section

DATE: August 03, 1994

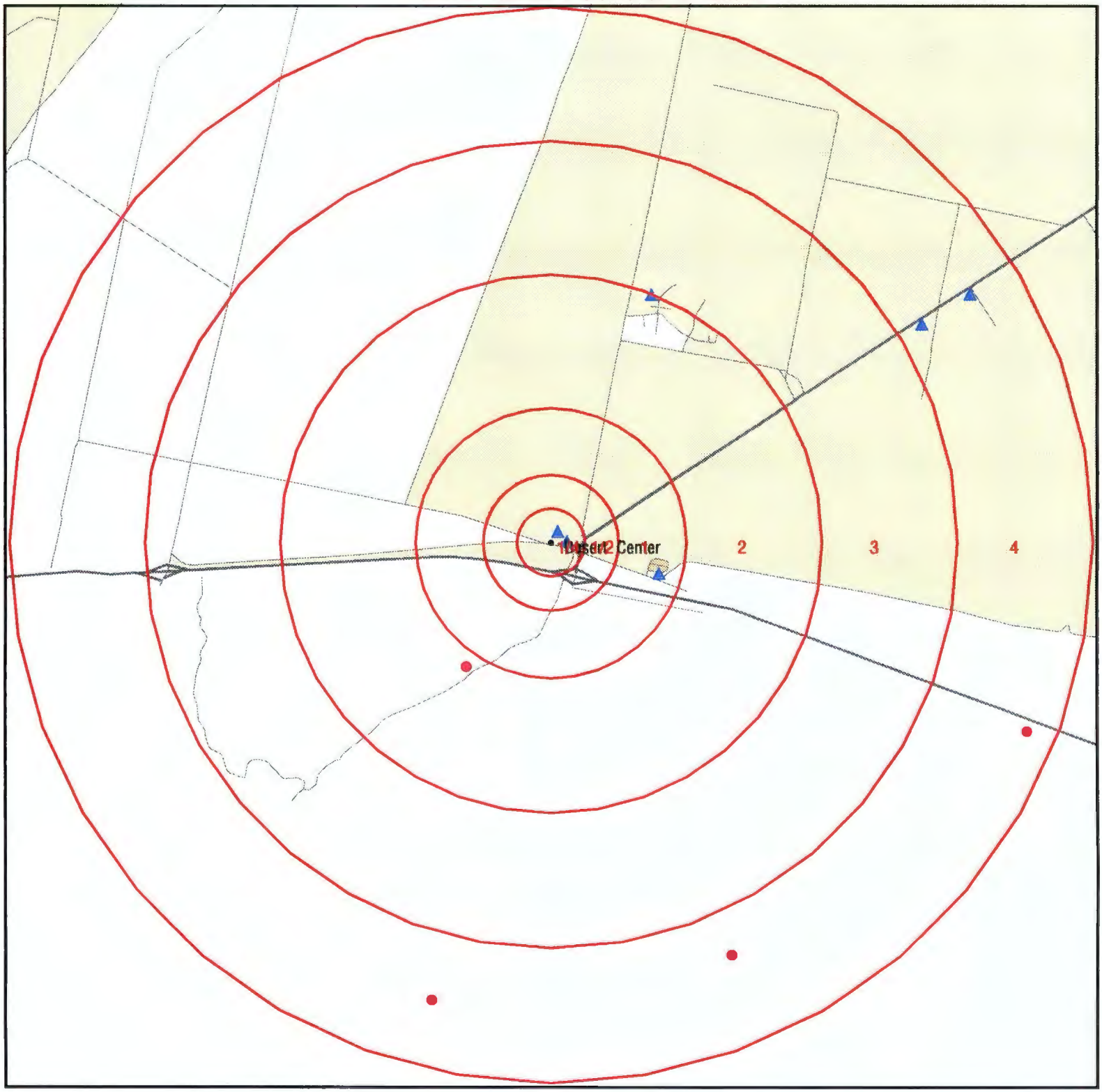
SOURCES: Drinking Water Supply Wells: Water Quality Monitoring Database, California Dept. of Health Services, 1991.
Endangered Species: Natural Diversity Database, California Dept. of Fish and Game, 1991.
Population Density: PL94-171, Bureau of the Census.

Population Density per Square Mile

- 0
- < 100
- 101-1000
- 1001-2500
- 2501-5000
- > 5001

- Drinking Water Supply Wells
- Endangered Species
- Streams
- County Boundary

NOTE: Radius increments in Miles.



SITE REPORT
EAGLE MOUNTAIN LANDFILL - CA0000052090
Latitude: 33 42 48 Longitude: 115 24 12

Sources:

Drinking Water Supply Wells: Water Quality Monitoring Database, California Dept. of Health Services, 1991.
Endangered Species: Natural Diversity Database, California Dept. of Fish and Game, 1991.
Population Density: PL94-171, Bureau of the Census.

POPULATION SITE SUMMARY: 557

RADIUS CODE	RADIUS DISTANCE (MILES)	POPULATION
17	1/4	3
16	1/2	2
15	1	58
14	2	14
13	3	18
12	4	26
11	4-15	439

DRINKING WATER WELLS:

Fields: Radius Distance,Drink #,County #,Source #,System #, System Name,Latitude,Longitude,Population Served

17,6,33,05S/15E-27B01 S,WELL01,3301077,CALTRANS-DESERT CENTER STATION , 334253.0,1152410.0, 0
17,7,33,05S/15E-27B03 S,WELL01,3301526,STANLEY RAGSDALE WATER CO, 334250.0,1152405.0,25
15,8,33,05S/15E-26C01 S,WELL01,3301593,S AND D TRAILER PARK , 334245.0,1152320.0, 210
13,4,33,05S/15E-14D01 S,WELL04,3309999,RIVERSIDE CO SERVICE AREA #51-LAKE TAMAR , 334430.0,1152350.0, 0
12,3,33,05S/16E-07M04 S,WELL01,3301857,WATERHOLE, 334455.0,1152125.0,25
12,5,33,05S/15E-12R01 S,WELL01,3301293,GREEN ACRES MOBILE PARK, 334440.0,1152144.0,78
11,1,33,04S/14E-01E01 S,WELL01,3301952,DESERT CENTER SCHOOL DIST - EAGLE MTN. , 335105.0,1152830.0, 0
11,2,33,05S/16E-08F01 S,WELL01,3301554,RIVERSIDE COUNTY DESERT CENTER AIRPORT , 334510.0,1152015.0,25

ENDANGERED SPECIES:

Fields: Radius Distance,NDDB #,Scientific Name,Common Name, GRank,SRank,US Description,CA Description

14, 13,334155,1152439,ESCOBARIA VIVIPARA VAR ALVERSONII , FOXTAIL CACTUS,G4T3,S2.2,Category 2,None
12, 15,334214,1152018,ESCOBARIA VIVIPARA VAR ALVERSONII , FOXTAIL CACTUS,G4T3,S2.2,Category 2,None
12, 16,334027,1152211,SALVIA GREATAI, OROCOPIA SAGE ,G3,S3.2,Category 2,None
12, 17,333947,1152423,FALCO MEXICANUS , PRAIRIE FALCON,G5,S3,None,None
11,1,335223,1151831,FALCO MEXICANUS , PRAIRIE FALCON,G5,S3,None,None
11,2,335103,1152005,FALCO MEXICANUS , PRAIRIE FALCON,G5,S3,None,None
11,3,334829,1152739,ESCOBARIA VIVIPARA VAR ALVERSONII , FOXTAIL CACTUS,G4T3,S2.2,Category 2,None
11,4,334827,1152737,DITAXIS CALIFORNICA , CALIFORNIA DITAXIS,G2,S2.2,Category 2,None
11,5,334643,1153733,OVIS CANADENSIS NELSONI , NELSONS BIGHORN SHEEP ,G4T3,S3,None,None
11,6,334853,1151848,GOPHERUS AGASSIZII, DESERT TORTOISE ,G4,S2,Threatened,Threatened
11,7,334650,1152757,GOPHERUS AGASSIZII, DESERT TORTOISE ,G4,S2,Threatened,Threatened
11,8,334335,1153139,FALCO MEXICANUS , PRAIRIE FALCON,G5,S3,None,None
11,9,334200,1153750,CASTELA EMORYI, CRUCIFIXION THORN ,G4,S2.2,None,None
11, 10,334252,1153055,DITAXIS CALIFORNICA , CALIFORNIA DITAXIS,G2,S2.2,Category 2,None
11, 11,334314,1152840,DITAXIS CALIFORNICA , CALIFORNIA DITAXIS,G2,S2.2,Category 2,None
11, 12,334126,1152836,ESCOBARIA VIVIPARA VAR ALVERSONII , FOXTAIL CACTUS,G4T3,S2.2,Category 2,None
11, 14,334049,1153102,ESCOBARIA VIVIPARA VAR ALVERSONII , FOXTAIL CACTUS,G4T3,S2.2,Category 2,None
11, 18,333800,1152106,DITAXIS CALIFORNICA , CALIFORNIA DITAXIS,G2,S2.2,Category 2,None
11, 19,333729,1151930,DESERT FAN PALM OASIS WOODLAND, NO COMMON NAME,G3,S3,None,None
11, 20,333720,1151918,ESCOBARIA VIVIPARA VAR ALVERSONII , FOXTAIL CACTUS,G4T3,S2.2,Category 2,None
11, 21,333641,1152219,OVIS CANADENSIS NELSONI , NELSONS BIGHORN SHEEP ,G4T3,S3,None,None

B SCORING DEFICIENCY CHECKLIST

EPA ID # CA0000053090
Federal Facility ID # _____
Facility Name Kaiser Eagle Mountain

City Eagle Mountain State CA Zip 92239

	INFORMATION IS PROVIDED? Y/N	ACCEPTABLE? Y/N*
1. OVERVIEW/SITE HISTORY		
1A. Reports submitted to EPA are referenced and copies of each reference are provided.	N	N
1B. Describe facility operations (manufacturing, storage, waste disposal practices, etc.) including the following:	N	N
1B1. History of the facility and sources (any area containing or potentially containing hazardous substances).	N	N
1B2. A topographic map with a 4-mile radius drawn around each source.	N	N
1B3. A facility and source location map and sketch.	N	N
1B4. Regulatory history of the facility (e.g., RCRA facility, TSCA, CERCLA, NPDES permits, etc.).	N	N
1C. Describe any emergency response actions or interim remedial actions that have occurred at the facility. Description should include amount of materials removed, disposal location, and sample analytical results prior and subsequent to removal.	N	N
1D. Describe any release of hazardous substances, pollutants, or contaminants to ground water, surface water, soil, or air and provide sampling results with detection limits, laboratory methods, and quality assurance procedures.	N	N
1E. Give the following population within each radius indicated below. Each radius should begin at the center of each source if the source is small or at the outer edge if the source is large. Count population in overlapping areas only once.	N	N
1E1. 0 - 1/4 mile	N	N
1E2. 1/4 - 1/2 mile	N	N
1E3. 1/2 - 1 mile	N	N
1E4. 1 - 2 mile	N	N
1E5. 2 - 3 mile	N	N
1E6. 3 - 4 mile	N	N

HRS SCORING DEFICIENCY CHECKLIST

Facility Name Kaiser Eagle Mountain

		INFORMATION IS PROVIDED? Y/N	ACCEPTABLE? Y/N*
1F.	Describe any prior spills (e.g., quantity of the spill, hazardous substances) that occurred at the facility.	N	N
1G.	Describe facility and source security and access (e.g., fences, patrols, gates, etc.).	N	N
1H.	Is there a permitted outfall?	N	N
2.	**WASTE/SOURCE INFORMATION (see Section 2 of the HRS Final Rule - December 1990 Federal Register)**		
2A.	Describe as specifically as possible the types of wastes produced at the facility and the methods in which these wastes were treated, stored, or disposed.	Y	Y
2B.	Describe as specifically as possible the amount (volume, weight, etc.) of each waste type produced and the form in which it was discharged or disposed (e.g., solid, liquid) at the facility.	N	N
2C.	Describe each source type (e.g., landfill) located within the facility boundary.	Y	Y
2D.	Describe as specifically as possible the constituents (concentrations of individual constituents) of each waste type disposed in each source.	Y	Y
2E.	Describe as specifically as possible the amount of waste treated, stored, or disposed of in each source (e.g., landfills, impoundments, tanks).	N	N
2F.	Determine the depth at which wastes were deposited in each source.	N	N
2G.	Describe as specifically as possible the condition/integrity of each source (e.g., Do landfills have liners or caps?).	N	N
2H.	Describe any secondary containment features/structures associated with each source (e.g., precipitation runon and runoff systems, leachate collection systems, gas collection systems).	N	N
2I.	Describe the size, volume, capacity, and area of each source.	N	N
2J.	Describe physical state of released contaminanats (e.g., liquid, gas, sludge, stable solid, etc.)	N	N
3.	**GROUND-WATER PATHWAY INFORMATION (see Section 3 of**		

HRS SCORING DEFICIENCY CHECKLIST

Facility Name Kaiser Eagle Mountain

		INFORMATION IS PROVIDED? Y/N	ACCEPTABLE? Y/N*
3A.	Determine if the ground water within a 4-mile radius of each source is used for any of the following purposes and locate the wells on a map. Each radius should begin at the center of each source if the source is small or at the outer edge if it is large. Provide the depth of each well.	N	N
3A1.	private or public drinking-water source	N	N
3A2.	irrigation of commercial food or commercial forage crops (include acres)	N	N
3A3.	commercial livestock watering	N	N
3A4.	commercial aquaculture	N	N
3A5.	water for major or designated recreational area, excluding drinking-water use	N	N
3A6.	standby wells used for drinking water at least once a year	N	N
3B.	Outline the public water distribution system within a 4-mile radius of each source on a topographic map.	N	N
3C.	Identify the nearest drinking-water well within a 4-mile radius of each source.	N	N
3D.	Determine the population (including workers, students, and residents) drawing from each drinking-water well within the following radii. Each radius should start at the center of each source if the source is small, or at the outer edge if it is large. Count population in overlapping areas only once.	N	N
3D1.	0 - 1/4 mile	N	N
3D2.	1/4 - 1/2 mile	N	N
3D3.	1/2 - 1 mile	N	N
3D4.	1 - 2 mile	N	N
3D5.	2 - 3 mile	N	N
3D6.	3 - 4 mile	N	N
3E.	Describe known or probable ground-water flow direction from each source.	N	N
3F.	Describe as specifically as possible the geology and hydrogeology of the facility area (including geological formation name, thickness, types of material, hydraulic conductivities, and depth to aquifers); provide references.	N	N
3G.	Discuss any evidence of aquitards and discontinuities between aquifers within a 4-mile radius of each source.	N	N
3H.	Describe any evidence of interconnections between the uppermost aquifer and lower aquifers within 2 miles of the site	N	N

HRS SCORING DEFICIENCY CHECKLIST

Facility Name Kaiser Eagle Mountain

		INFORMATION IS PROVIDED? Y/N	ACCEPTABLE? Y/N*
3I.	Estimate annual net precipitation at the facility.	Y	Y
3J.	Discuss soil or geologic conditions that might inhibit or facilitate ground-water migration.	N	N
3K.	Determine if sources are located in an area of Karst terrain.	N	Y
3L.	Provide results from ground-water sampling of aquifers underlying the sources and from domestic wells (drinking water) within 2 miles of each source.	N	N
3M.	Provide results from background ground-water sampling of aquifers underlying the sources.	N	N
3N.	Determine if any areas within a 4-mile radius of each source are located in a Wellhead Protection Area according to Section 1428 of the Safe Drinking Water Act.	N	N
4.	**SURFACE-WATER PATHWAY INFORMATION (see Section 4 of the HRS Final Rule - December 1990 Federal Register)**		
4A.	Describe surface-water bodies 0 to 15 miles downstream of each source and provide a map of surface-water bodies receiving drainage from each source.	N	Y
4B.	Discuss the probable surface runoff pattern from each source to surface waters, including the distance to the nearest surface-water body; provide a map.	N	N
4C.	Describe the point(s) at each source where hazardous substances begin to migrate and their probable point(s) of entry into a surface-water body (including ponds, lakes, streams, etc.).	N	N
4D.	Identify if surface water drawn from intakes within 15 miles downstream of the probable point of entry is used for any of the following purposes:	N	Y
4D1.	irrigation (5-acre minimum) of commercial food or commercial forage crops	N	Y
4D2.	watering of commercial livestock	N	Y
4D3.	ingredient in commercial food preparation	N	Y
4D4.	major or designated water recreation area, excluding drinking water	N	Y
4E.	Identify the following targets associated with surface-water bodies 0 to 15 miles downstream of the probable point of entry:	N	N

HRS SCORING DEFICIENCY CHECKLIST

Facility Name Kaiser Eagle Mountain

		INFORMATION IS PROVIDED? Y/N	ACCEPTABLE? Y/N*
4E1.	population (residents, workers, and students) served by intakes of drinking water	N	Y
4E2.	sensitive environments (see Table 4-23, December 1990 Federal Register) and critical habitats for federally endangered or threatened species	N	Y
4E3.	economically important resources (e.g., shellfish)	N	Y
4E4.	any portion of the surface water designated by a state for drinking-water use under Section 305(a) of the Clean Water Act; or any portion of surface water usable for drinking water	N	Y
4F.	Determine the miles of wetlands (wetland frontage) along surface-water bodies 0 to 15 miles downstream from the probable point of entry (see 40 CFR section 230.3).	N	N
4G.	Provide results from sampling of wetlands and/or sensitive environments 0 to 15 miles downstream of each source.	N	N
4H.	Discuss any qualitative, quantitative, or circumstantial evidence of contamination of surface waters from sources.	N	N
4I.	Provide results from sediment and surface-water sampling for points 0 to 15 miles downstream of each source.	N	N
4J.	Provide results from background sediment and surface-water sampling.	N	N
4K.	Provide results from sampling of surface-water intakes 0 to 15 miles downstream of each source.	N	N
4L.	Estimate the size of the upgradient drainage area for each source.	N	N
4M.	Determine the 2-year, 24-hour rainfall for the site.	N	Y
4N.	Discuss the average annual streamflow associated with each surface-water body located 0 to 15 miles downstream of each source.	N	N
4O.	Determine surface soil types at the facility.	Y	Y
4P.	Determine if sources are located in a 1-year, 10-year, 100-year, or 500-year flood plain.	Y	Y
4Q.	Discuss fisheries (recreational or commercial) in surface-water bodies 0 to 15 miles downstream of each source:	N	Y

HRS SCORING DEFICIENCY CHECKLIST

Facility Name Kaiser Eagle Mountain

	INFORMATION IS PROVIDED? Y/N	ACCEPTABLE? Y/N*
4Q1. Describe annual production (in pounds) of human food chain organisms (e.g., trout, shellfish, snapping turtles, crabs) per acre of streams and rivers 0 to 15 miles downstream of each source.	N	Y
4Q2. Describe annual production (in pounds) of human food chain organisms (e.g., trout, shellfish, snapping turtles, crabs) per acre of ponds, lakes, bays, or oceans 0 to 15 miles downstream of each source.	N	Y
4R. Identify closed fisheries 0 to 15 miles downstream of each source.	N	Y
4S. Provide results from sampling of human food chain organism tissues in streams and rivers 0 to 15 miles downstream of each source and in ponds, lakes, and bays that receive drainage from the sources.	N	Y
5. AIR PATHWAY INFORMATION (see Section 6 of the HRS Final Rule - December 1990 Federal Register)		
5A. Describe if there has been an observed release (i.e., visual or analytical evidence) of a hazardous substance to the atmosphere.	Y	Y
5B. Determine the shortest distance to the closest residence or regularly occupied building or area from any on-site source.	N	N
5C. Determine if any of the following resources are located within a 1/2-mile radius of each source	N	N
5C1. commercial agriculture	N	N
5C2. commercial silviculture	N	N
5C3. major or designated recreation area	N	N
5D. Determine if sensitive environments are within a 4-mile radius of each source.	N	N
5E. Determine the total area of wetlands within a 4-mile radius of each source.	N	N
5F. Does facility have air operating permits?	N	N
6. SOIL-EXPOSURE PATHWAY INFORMATION (see Section 5 of the HRS Final Rule - December 1990 Federal Register)		
6A. Describe any areas of contamination that are within 2 feet of the ground surface; provide the real extent of contamination.	N	N

HRS SCORING DEFICIENCY CHECKLIST

Facility Name Kaiser Eagle Mountain

		INFORMATION IS PROVIDED? Y/N	ACCEPTABLE? Y/N*
6B.	Provide locations and depths of soil samples and results.	N	N
6C.	Provide results of background soil sampling.	N	N
6D.	Describe the measures taken to limit access to areas with soil contamination within 2 feet of the surface (e.g., fences, security guards).	N	N
6E.	Determine if any of the following are located near or within an area of soil contamination (within 2 feet of the surface); provide the number of individuals for 6E1 and 6E2:	N	N
6E1.	within 200 feet of any residences, schools, or day care centers and within the property boundary	N	N
6E2.	within 200 feet of the work place area and within a work place property boundary	N	N
6E3.	within boundaries of commercial agriculture, silviculture, livestock production, or grazing area	N	N
6E4.	within boundaries of a terrestrial-sensitive environment (see Table 5-5, December 1990 Federal Register)	N	N
6F.	Determine the number of individuals who live, work, or attend school within the following distances of soil contamination (within 2 feet of the surface).	N	N
6F1.	0 - 1/4 mile radius	N	N
6F2.	1/4 - 1/2 mile radius	N	N
6F3.	1/2 - 1 mile radius	N	N

* Where information is provided but not acceptable, see attachment for a detailed explanation of why the information is not acceptable.

**** CONFIDENTIAL ****

***** PREDECISIONAL DOCUMENT *****

SUMMARY SCORESHEET FOR COMPUTING PROJECTED HRS SCORE

SITE NAME: Kaiser Eagle Mountain

CITY: Eagle Mountain COUNTY: Riverside

EPA ID #: CA0000053090 EVALUATOR: John P. Zwierzycki

JOB #: 4162316.38 SCORE DATE: 8/15/94

LATITUDE: 33° 51' 55" North LONGITUDE: 115° 28' 25" West T/R/S 3S / 14E / 36

THIS SCORESHEET IS FOR A: ☐ PA ☐ SI ☐ ESI ☐ SI Sum ☐ PA Sum ☒ Other (Specify) Federal Facility PA Review

RCRA STATUS (check all that apply):
- ☐ Generator
- ☐ Small Quantity Generator
- ☐ Transporter
- ☐ TSDF
- ☒ Not listed in RCRA Database as of (date of print out) 2/15/94

STATE SUPERFUND STATUS

☐ BEP (date) _____ ☐ WQARF (date) _____

☒ No State Superfund Status (date) 8/13/94

	S pathway	S^2 pathway
Groundwater Migration Pathway Score (S_{gw})	*	
Surface Water Migration Pathway Score (S_{sw})	*	
Soil Exposure Pathway Score (S_s)	1.6	2.56
Air Migration Pathway Score (S_a)	*	
$S_{gw}^2 + S_{sw}^2 + S_s^2 + S_a^2$		2.56
$(S_{gw}^2 + S_{sw}^2 + S_s^2 + S_a^2)/4$		0.64
$\sqrt{(S_{gw}^2 + S_{sw}^2 + S_s^2 + S_a^2)/4}$		0.80

Pathways not assigned a score (explain):

* Pathway evaluated qualitatively not quantitatively. Pathways were not evaluated due to the lack of significant target populations within the target distance limit for each pathway.

SOIL EXPOSURE PATHWAY SCORESHEET

Factor Categories and Factors

RESIDENT POPULATION THREAT

Likelihood of Exposure	Maximum Value	Projected Score	Rationale	Data Qual.
1. Likelihood of Exposure	550	550	S-1	E
Waste Characteristics				
2. Toxicity	a	10	S-2	D
3. Hazardous Waste Quantity	a	10	S-3	D
4. Waste Characteristics	100	3		
Targets				
5. Resident Individual	50	0	S-4	H
6. Residential Population				
6a. Level I Concentrations	b	0	S-4	H
6b. Level II Concentrations	b	0	S-4	H
6c. Population (lines 6a+6b)	b	0		
7. Workers	15	5	S-5	E
8. Resources	5	0	S-6	E
9. Terrestrial Sensitive Environments	c	75	S-7	E
10. Targets (lines 5+6c+7+8+9)	b	80		
Resident Population Threat Score				
11. Resident Population Score (lines 1x4x10)	b	132,000		

NEARBY POPULATION THREAT

Likelihood of Exposure				
12. Attractiveness/Accessibility	100	10	S-8	E
13. Area of Contamination	100	20	S-9	E
14. Likelihood of Exposure	500	5		D
Waste Characteristics				
15. Toxicity.	a	10	S-2	D
16. Hazardous Waste Quantity	a	10	S-3	D
17. Waste Characteristics	100	3		
Targets				
18. Nearby Individual	1	0	S-10	E
19. Population Within 1-Mile[e]	b	0	S-11	E
20. Targets (lines 18+19)	b	0		

SOIL EXPOSURE PATHWAY SCORESHEET

(Continued)

Factor Categories and Factors

Nearby Population Threat Score	Maximum Value	Projected Score	Rationale	Data Qual.
21. Nearby Population Threat (lines 14x17x20)	b	0		

SOIL EXPOSURE PATHWAY SCORE

22. Soil Exposure Pathway Score (Ss), [lines (11+21)/82,500 subject to a maximum of 100]	100	1.6

Nearby Population Targets

Distance (miles)	Total Population Within Distance Ring	(P) Distance-Weighted Population Values (Table 5-10)
0 to 1/4	0	0
>1/4 to 1/2	0	0
>1/2 to 1	0	0
	Sum (P)	0

Potential Population Threat factor value = $\frac{\text{Sum (P)}}{10}$ = 0

a Maximum value applies to waste characteristics category.
b Maximum value not applicable.
c No specific maximum value applies to factor. However, pathway score based solely on sensitive environments is limited to a maximum of 60.
d Do not round yo nearest integer.
e Use additional tables.

HRS Rationale
Kaiser Eagle Mountain
EPA ID #0000053090

Soil Exposure Pathway

S-1: Toluene, a CERCLA hazardous substance, is present in soils at the Eagle Creek Wash area. Background soil sampling has not been conducted at the Kaiser Eagle Mountain site; however, it is unlikely that toluene is naturally occurring at the site. An area of observed contamination has therefore been projected at the Kaiser Eagle Mountain site. From Section 5.1.1, a likelihood of exposure of 550 is assigned.

S-2: Toluene: Toxicity = 10

S-3: Hazardous Waste Quantity:

Source Area	Waste Quantity	Tier	Value
Eagle Creek Wash Area	100 square feet	Area	0.003
Eagle Mountain Unauthorized Landfill	2 acres	Area	2.56

Per Section 2.4.2.2 a Hazardous Waste Quantity default value of 10 is assigned to the site.

S-4: There are no residences, day care, or school facilities located within 200 feet of projected areas of observed contamination. From Section 5.1.3, a resident individual factor value of 0 is assigned.

S-5: There are an estimated 5 workers at the site that may come in contact with projected areas of observed contamination. From Table 5-4, a factor value of 5 is assigned for workers.

S-6: Projected areas of observed contamination are not used for commercial agriculture, silviculture, or livestock production. From Section 5.1.3.4, a resource value of 0 is assigned.

S-7: Projected areas of observed contamination may provide habitat for the desert tortoise, a State and Federal Threatened Species. From Table 5-5, a Terrestrial Sensitive Environment Value of 75 is assigned.

S-8: Projected areas of observed contamination at the site are accessible, with no public recreation use. From Table 5-6, an attractiveness/accessibility value of 10 is assigned.

S-9: The total area of observed contamination is approximately 87,220 square feet. From Table 5-7, an area of contamination factor value of 20 is assigned.

S-10: There are no people living within 1 mile of projected areas of observed contamination. From Table 5-9, a nearby individual factor value of 0 is assigned.

S-11: There are no people living within 1 mile of projected areas of observed contamination. From Table 5-10, a distance weighted population value of 0 is assigned.

SITE/INCIDENT FORM 1 (SI1)

*SITE NAME: KAISER EAGLE MOUNTAIN
*EPA ID NO: CA0000053090 FMS SITE/SPILL ID: ____

S/I RPM-OSC NAME/PHONE: _____/(___)___-____
OTHER REG CONTACT NAME/PHONE: _____/(___)___-____

ALIAS NAME(S): _____, _____
_____, _____
_____, _____

*STREET: N OF HWY 10 8M OFF KAISER RD.
*CITY: DESERT CENTER
*COUNTY: RIVERSIDE
*STATE: CA
ZIP: 92239

*LATITUDE: 33/51/55/0 .
*LONGITUDE: 115/28/25/0 .
*LL SOURCE: R
*LL ACCURACY: _

CONGRESSIONAL DISTRICT: 37
*COUNTY CODE: 065
*SMSA: 6780
USGS HYDRO UNIT: 18100100
FED AGENCY PRP FLG: N
STATE PRP FLAG: N
PRP AGENCY CODE: ____, ____, ____, ____, ____, ____.
SECTION CODE : _____

*FED. FACILITY FLAG: N
*RCRA FACILITY FLAG: _
FED FACILITY DOCKET FLAG: F
DIOXIN TIER: _____
SITE NAME SOURCE: _
MUNICIPAL PRP FLAG: N
COST RECOVERY IND: E

AGGREGATE CASE BUDGET OBLIGATIONS: _____
AGGREGATE FUND OBLIGATIONS: TBD

*SITE/INCIDENT ABSTRACT: _____
_____
_____
_____

*SITE CLASSIFICATION: ND

(NG) FUND LEAD/NEGOT
(FE) FEDERAL ENFORCEMENT
(F) FUND LEAD/NO NEGOT
(ND) NO DETERMINATION(DEFAULT)
(SE) STATE ENFORCEMENT

*CORE DATA ELEMENT OR CODE
@ USACE OWNED SUBEVENT

*SITE NAME: KAISER EAGLE MOUNTAIN S/I RPM-OSC NAME/PHONE: _____/(___)___-____
*EPA ID NO: CA0000053090 FMS SITE/SPILL ID: ___ OTHER REG CONTACT NAME/PHONE: _____/(___)___-____

*ENTRY NPL/STATUS INDICATOR: N *PROPOSED NPL UPDATE NO: 00 *FINAL NPL UPDATE NO: 00

(S) PRE-PROPOSAL TO NPL
(P) SITE CURRENTLY PROPOSED FOR THE NPL
(R) SITE REMOVED FROM THE PROPOSED NPL
(F) SITE CURRENTLY ON THE NPL
(D) SITE DELETED FROM NPL
(N) SITE IS NOT CURRENTLY NOR WAS FORMERLY ON THE PROPOSED OR FINAL NPL
(O) NON SITE: A SITE/INCIDENT WHICH WILL NOT COUNT IN THE INVENTORY OR IN STATISTICAL REPORTS

*SITE CATEGORY: _

(A) ABANDONED
(D) DIOXIN
(H) HOUSING AREA/FARM
(L) LANDFILL
(O) OTHER
(T) MINES/TAILING
(B) CHEM. PLANT/IND REF
(F) FEDERAL FACILITY
(I) IND. WASTE TREATMENT
(M) MANUFACTURING PLANT
(P) PURE LAGOONS
(V) WATERWAYS/CREEKS/RIVERS
(C) CITY CONTAMINATION
(G) GROUND WATER
(J) INORGANIC WASTE
(N) MILITARY RELATED
(R) RADIOACTIVE SITE
(W) WELLS

*OWNERSHIP INDICATOR: PR

(PR) PRIVATELY OWNED
(FF) FED. OWNED
(ST) STATE OWNED
(CO) COUNTY OWNED
(DI) DISTRICT OWNED
(MN) MUNICIPALITY OWNED
(IL) INDIAN LANDS
(MX) MIXED OWNERSHIP
(OH) OTHER
(UN) UNKNOWN

*INCIDENT TYPE: (FOR REMOVAL OSC'S ONLY) _

(O) OIL SPILL OCCURING AT A LOCATION NOT PREVIOUSLY IDENTIFIED AS A CERCLIS SITE
(N) SPILL (OTHER THAN OIL) OR OTHER REMOVAL AT A LOCATION NOT PREVIOUSLY IDENTIFIED AS A CERCLIS SITE

MEDIA SECTION

MEDIUM: __
(LA) LAND (SW) SURFACE WATER (GW) GROUND WATER
(AI) AIR

GOAL ATTAINED: _
(F) FULLY ACHIEVED (P) PARTIALLY ACHIEVED (U) CLEANUP UNDERWAY
(A) MEDIUM AFFECTED (Z) MEDIUM NOT INVOLVED

DIRECT THREAT ADDRESSED: _
(Y) YES (N) NO (Z) DIRECT CONTACT THREAT DOES NOT EXIST

SITE/INCIDENT COMMENTS (SIC)

*SITE NAME: KAISER EAGLE MOUNTAIN
*EPA ID NO: CA0000053090 FMS SITE/SPILL ID: ____

S/I RPM-OSC NAME/PHONE: _____/(___)___-____
OTHER REG CONTACT NAME/PHONE: _____/(___)___-____

	COMMENT TYPE	GROUP NUMBER	LINE NUMBER	*COMMENT
--------	__	__	__	
--------	__	__	__	
--------	__	__	__	
--------	__	__	__	

*CORE DATA ELEMENT OR CODE
@ USACE OWNED SUBEVENT

*SITE NAME: KAISER EAGLE MOUNTAIN
*EPA ID NO: CA0000053090 FMS SITE/SPILL ID: ___

S/I RPM-OSC NAME/PHONE: _____/(___)___-____
OTHER REG CONTACT NAME/PHONE: _____/(___)___-____

	REGIONAL UTILITY CODE	DESCRIPTION	DATE 1 MM/DD/YY	DATE 2 MM/DD/YY	DATE 3 MM/DD/YY	FREE FIELD

--						
---						

*CORE DATA ELEMENT OR CODE
@ USACE OWNED SUBEVENT

*SITE NAME: KAISER EAGLE MOUNTAIN
*EPA ID NO: CA0000053090 FMS SITE/SPILL ID: ___

S/I RPM-OSC NAME/PHONE: _____/(___)___-____
OTHER REG CONTACT NAME/PHONE: _____/(___)___-____

*OPERABLE UNIT IND: 00 *OPERABLE UNIT NAME: SITE EVALUATION/DISPOSITION

*OPERABLE UNIT DESCRIPTION: _____

*OPERABLE UNIT IND: ___ *OPERABLE UNIT NAME: _____

*OPERABLE UNIT DESCRIPTION: _____

*OPERABLE UNIT IND: ___ *OPERABLE UNIT NAME: _____

*OPERABLE UNIT DESCRIPTION: _____

NOTE: *FOR PREREMEDIAL AND REMOVAL EVENTS, OPERABLE UNIT INDICATOR = 00.
*FOR REMEDIAL EVENTS, ASSIGN OPERABLE UNIT INDIICATORS BEGINNING WITH 01.
*AN "ALIAS LINK" LINKS AN OPERABLE UNIT WITH A SPECIFIC ALIAS

*CORE DATA ELEMENT OR CODE
@ USACE OWNED SUBEVENT

INFORMATION (EVT/SVT/FIN)
*SITE NAME: KAISER EAGLE MOUNTAIN
*EPA ID NO: CA0000053090 FMS SITE/SPILL ID: ____

S/I RPM-OSC NAME/PHONE: _____/(___)___-____
EVENT REGIONAL CONTACT NAME/PHONE: _____/(___)___-____
OTHER REG CONTACT NAME/PHONE: _____/(___)___-____

*OP UNIT *EVENT SUBEVENT TYPE	*OP UNIT NAME *EVENT NAME *SUBEVENT NAME	LEAD	<----------START----------> PLAN (MM/DD/YY)	*PLAN (FY/Q)	*ACTUAL (MM/DD/YY)	<---------- COMPLETE -------> PLAN (MM/DD/YY)	*PLAN (FY/Q)	*ACTUAL (MM/DD/YY)	PLANNING STATUS	SCAP NOTE
00	SITE EVALUATION/DI									
DS1	DISCVRY 01	F	__/__/__	__/_	__/__/__	__/__/__	__/_	11/15/93	_	_____
*EVENT QUALIFIER: _										
PA1	PA 01	FF	__/__/__	__/_	__/__/__	__/__/__	__/_	08/19/94	_	_____
*EVENT QUALIFIER: N										

ROUTING AND TRANSMITTAL SLIP

Date 11/28

TO: (Name, office symbol, room number, building, Agency/Post)	Initials	Date
1. Co DOUGLAS (H-8-1)		
2.		
3.		
4.		
5.		

	Action		File		Note and Return
	Approval		For Clearance		Per Conversation
	As Requested		For Correction		Prepare Reply
	Circulate		For Your Information		See Me
X	Comment		Investigate		Signature
	Coordination		Justify		

REMARKS

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)	Room No.—Bldg.
PBO for DCW	Phone No.

5041-102

OPTIONAL FORM 41 (Rev. 7-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.206

* U.S. GPO: 1990 — 262-080

ROUTING SLIP
SUPERFUND and FEDERAL FACILITIES

11/7, 94

Immediate Office	Federal Facilities	Other Offices
H - 1 - S	H - 9	H - 1 - _____
☒ Keith Takata	❑ Julie Anderson	❑ Dianna Young
❑ Gwen Brown	❑ John Kemmerer	❑ other
❑ Sherry Nikzat	❑ Greg Baker	RC - _____
❑ Tom McMenamin	❑ Jane Diamond	❑ Chuck McKinley
❑ Bob Fitzgerald	❑ Doug Steele	❑ other
❑ Matthew Irwin	❑ Rich Seraydarian	

SUPERFUND

H - 6	H - 7	H - 8
❑ Dave Jones	❑ Nancy Lindsay	☒ Don White
❑ Mike Montgomery	❑ John Blevins	❑ Tom Mix
❑ Kent Kitchingman	❑ Dan Opalski	❑ Caroline Ireson
❑ Tom Kremer	❑ Jim Hanson	❑ Terry Brubaker
❑ Nate Lau	❑ Betsy Curnow	❑ Peter Orth
		❑ Kathleen Shimmin

Notes: _____ *Date:*

Laura has the lead
but please freely
cooperate.

\info-mgt\forms\rtngslip.drw rev 08/05/94

Keith Takata

To DPH / JZ / DW (EIS issues)
cc: AZ, Lori L., KT

I need a lead person to focus on Eagle Mtn issues & be a point of contact for the Eagle Mtn issue in general & a team. What do you suggest. I haven't seen

follow up to this get.

Let me know.

CA0000053090
Kaiser-Eagle Mountain

BLM mixed ownership site

"Don't Trash the Desert"

Citizens for the Chuckwalla Valley

P.O. Box 397, Desert Center 92239 (619) 392-4722

DATE	9/27		
ACTION (✓)		COPIED (✓)	
	RA	✓	RA
	DRA	✓	DRA
	ATD	✓	ATD
	HWMD	✓	HWMD
	WMD		WMD
	OPM		OPM
✓	OEA		OEA
	ORC		ORC

SEPTEMBER 23, 1994 Lorie Lewis

MS. FELICIA MARCUS (O-R-A)
DIRECTOR, U.S. EPA Region 9
75 HAWTHORNE STREET
SAN FRANCISCO CA 94105

CERTIFIED MAIL RECEIPT#P 239 199 556
RETURN RECEIPT REQUESTED

RE: "ECO TOUR" SEPTEMBER 9 & 10, 1994

Felicia

Dear Ms. Marcus,

This is a follow up to the "Eco Tour" conducted with the Center For Community Action & Environmental Justice ("CCAEJ"), The Pesticide Watch, and U.S. EPA Region 9. This letter will focus on the last stop on the tour, near the Torres-Martinez Tribal Reservation. Representatives from CITIZENS FOR THE CHUCKWALLA VALLEY, ("CCV") and THE EAGLE MOUNTAIN LANDFILL OPPOSITION COALITION ("EMLOC") attended, and now will outline some of the areas where we think U.S. EPA could be helpful.

You said EPA can and will comment on the new Environmental Impact Report/ Environmental Impact Statement ("FEIR/FEIS"). The Superior Court of San Diego ordered a new FEIR/FEIS for the proposed Eagle Mountain dump.

EPA should comment on the air quality data. : The modeling and information given to EPA from Mine Reclamation Corporation ("MRC"), has been skewed and did not give a true analysis of the impacts, and, we believe that the Prevention of Significant Deterioration ("PSD") requirements have been triggered. MRC proposes to break the project into four phases. The application to the South Coast Air Quality Management District ("District") contains data on the landfill gas flares emissions for the first phase only. The Eagle Mountain landfill is a "facility" as defined in Rule 1302(h), "Any permit unit or grouping of permit units or other containment-emitting activities which are located on one or more contiguous properties.", as well as a "stationary source" of air pollution, as that term is defined by the Clean Air Act, and must be treated in it's entirety as a single facility for regulatory purposes. (CAA §§ 111 (a)(3),(b),(i)(A), 42 USC §§7411 (a)(3), (b) (1)(A). In justifying its definition of "stationary source" for PSD purposes, (a definition that is identical to the one the District must utilize in reviewing the Eagle Mountain project), EPA sated, "Applying PSD review to large groupings rather than separate pieces of process equipment

ensures adequate review of new plants...unit-by-unit review, without plant-wide review, would fail to protect air quality standards and increments." 44 Federal Register 51931(September 5, 1979). EPA has given an exemption to PSD requirements for Eagle Mountain, even though evidence suggests PSD requirements have been triggered by this project. We request, and strongly recommend that you review this exemption. Also, please find enclosed, a recent Wall Street Journal article regarding pollution from dumps. Among other things, it states, "Dumps are a bigger threat to air quality than to ground water, recent EPA calculations suggests. 'It blew us away', Susan Thorneloe, an EPA air quality official, says.". Would you have your staff send us a copy of the studies that the EPA based their calculations ?

Regarding water quality, we ask that you enforce the requirements of the Clean Water Act if permits are to be issued for this project. Waste water is proposed to be discharged into the existing settling ponds, located at Eagle Mountain. These ponds have never been analyzed in the EIR/EIS. They are unlined ponds that have been in existence for 30-40 years. In their present state, they cannot support the townsite. The sewage lines in place need up grading - it is very common for them to leak due to disintegration over the last 30-40 years. You may recall that Coliform bacterial has been detected in the Eagle Mountain School well. It is only a matter of time before contaminants migrate to other areas of the Chuckwalla Valley. EPA has jurisdiction over waste water discharge requirements, but have delegated responsibility to the Regional Water Quality Control Board, who have ignored legitimate concerns from the public.

Another area that EPA should address involves the enforcement of a combination of the Clean Air Act and the Clean Water Act.: MRC proposes to utilize what is called "fine tailings" clay as a level of protection in the liner system. The Charpieds accompanied officials from the State's Department of Toxic Substance Control, ("DTSC"), during an investigation of the site. Among other soil samples taken, DTSC obtained sample from the fine tailings pond, for analysis. (DTSC made three split samples, one for the State, Kaiser, and the Charpieds, results enclosed). There are levels of select metals that are generally high when compared to typical levels found in soils, according to the Agency for Toxic Substances and Disease Registry, such as cadmium, cobalt, copper, lead, and zinc. Again, the tailings pond sampled was in use for 30-40 years, (the analysis of the fine tailings in the EIR/EIS were from ponds that existed during the mine's last

5 to 7 years of operation, and referred to as "clarification ponds"). The samples obtained by DTSC were taken at a depth of about 12 to 18 inches. It is not an unreasonable request for samples of this material to be taken for analysis from depths as far as the soil is likely to be taken from the site. (From the fine tailings settling ponds, as well as the clarification ponds). Surely, a material being proposed for use as a protection layer for the valley's groundwater warrants careful scrutiny.

Further, we are concerned that soil containing heavy metals is carried as dust to areas of the community where people could be exposed. Following groundwater contamination, the most likely route of exposure at the site is by inhalation of dust carried from the site by winds. (Our elementary school is virtually across the street from the site). Heavy metals such as arsenic, lead, cadmium, and chromium can be toxic if inhaled. The fine tailings are considered to be mining waste, and DTSC said mining laws classify toxicity differently than other industries, and under those laws, there is no threat to our community, as the site sits right now. However, it seems the classification of the tailings would change from mining waste to a construction material, which would trigger regulatory action regarding the use of the material. DTSC said these issues are the responsibility of the regional water board, who unfortunately ignored our questions, regarding such. We request that you review the Water Board's permits to address these inadequacies.

You may recall citizens telling you that there are three major garbage dumps proposed in the California Desert, that intend to accept 20,000 tons of garbage a day, for over a century. Every one of the proposals have a land exchange between the developer(s) and the Bureau of Land Management. EPA has jurisdiction to step in on these land exchanges because they fall under the Federal Land Policy and Management Act ("FLPMA"). Before permits are issued for any of these proposals, the U.S. Geological Survey ("USGS") should be requested to determine if the sites are environmentally sound, geologically. The geological studies for Eagle Mountain, for example, have been conducted by MRC's hired guns. There is evidence obtained from Cal Tech in Pasedena that indicates seismic activity within the landfill footprint. We urge EPA to insist that the USGS analyze the proposed mega dumps in the desert

EPA could and should advocate alternative technologies to dumping. Assembly Bill 939 list landfills as the last alternative, yet here we have

three mega dumps targeted for our desert. Allowing these proposals to come to fruition, only serves to stifle incorporating new technologies, such as landfill reclamation. Policies clearly state landfills as the final option, yet new landfills are in the forefront of dealing with solid waste.

Lastly, we commented to you about U.S. EPA's policy of regional landfills. This is unacceptable to those of us who live near these proposals. It seems these policies are set up by industry, adopted by the regulators, then thrust upon the private citizens who have had no opportunity for input of said policies. Conforming to the needs of corporate America subverts U.S. EPA's responsibility to protect the health of the public. Would you be willing to help create a "commission" on solid waste issue (garbage as well as sludge) comprised of an equal representation of the public, regulators, and industry?

The two day Eco Tour of September 9 & 10th was an education for us all. The conclusion that Donna Charpied arrived at is, that all of the people in the communities visited, who are environmentally/chemically ill today, could have been prevented. That is exactly the point with the Eagle Mountain proposal. If Eagle Mountain is permitted, it will be the next, and probably the largest superfund site in Riverside County. We do not want to have to have you and your staff visit our community ten years from now, to listen to our health problems. It is much too late then. We need to work together on the solutions, and not perpetuate the problems. We once heard a definition of insanity, : Doing the same thing repeatedly, expecting different results. Let's stop this insane approach to solid waste issues, and let's stop the serving of preferential treatment to the developers, and begin to deal with this problem in a socially and environmentally responsible manner.

In closing, we did mention it would take hours to discuss all of the problems with Eagle Mountain. We outlined only a few in this letter. You indicated a willingness to discuss it further, and we welcome a meeting with you and your staff - please let us know a convenient time. You also said that you will provide us with a contact person, from your staff, who we look forward to working with. We thank you and applaud you and your staff for the time and energy it took to go to all of the communities on the Eco Tour, and your seemingly willingness to work with people who are impacted or potentially impacted, by poor decision making. We look forward to a response

to our letter, in the near future. Thank you.

Sincerely,

Donna Charpied

Donna Charpied, for
CITIZENS FOR THE CHUCKWALLA VALLEY

enc:
Wall Street Journal article 9/13/94
Analysis of fine tailings

cc
Julie & Steven Smiley, Secretary(s) CCV
Mary Zeiler, Co-Chair CCV
Larry Charpied, Chair, CCV
Dan and Robert Roman, EMLOC
Mr. Joe Loya, Torres-Martinez Tribal Council
Penny Newman, CCAEJ
Joan Clayburgh, Pesticide Watch
Patricia Schifferle, Pacific Advocates
Interested Parties

BACTERIOLOGY
WATER TESTING
HAZARDOUS WASTE TESTING
CA DHS CERTIFICATION 1156

LABORATORIES
6100 QUAIL VALLEY COURT, RIVERSIDE

E.S. BABCOCK & SONS, INC.
ESTABLISHED 1906

909/653-3351
FAX 909/653-1662

P.O. BOX 432
RIVERSIDE, CA 92502

03/17/94

To: Desert Protection Society
Attn:
73790 El Paseo, Suite B200
Palm Desert, CA 92260

Lab No. 940222-1888
Invoice No. 50780
Customer No. de0661

	Submitted	Sampled
By	RH	RH
Date	02/17/94	02/11/94
Time	6:50	09:25

Chain of Custody on File: Y

Sample Marked: FTP-1-C Eagle Mountain Mine
CLAY For Liner !

Sample Matrix	Sample Preparation	Digestion Method
Aqueous liquid	XX Total	EPA 3010
XX Soil	TCLP	EPA 3015
Sludge	CA WET	EPA 3020
Oil		XX EPA 3050
Non-aqueous liquid		EPA 3051

Percent Solids (%) 92.1

Parameter Name	EPA Method	Result mg/kg as received	PQL
Antimony (Sb)	6010/7041	ND	10
Arsenic (As)	6010/7060	55	10
Barium (Ba)	6010/7081	30	10
Beryllium (Be)	6010/7090	ND	5
Cadmium (Cd)	6010/7130/7131	13	5
Chromium (Cr)	6010/7190/7191	13	10
Chromium +6 (hex)	7196	NA	
Cobalt (Co)	6010/7200	170	10
Copper (Cu)	6010/7210	570	10
Lead (Pb)	6010/7420/7421	73	10
Mercury (Hg)	7470/7471	ND	0.5
Molybdenum (Mo)	6010/7480	ND	10
Nickel (Ni)	6010/7520	25	10
Selenium (Se)	6010/7740	22	10
Silver (Ag)	6010/7760/7761	ND	10
Thallium (Tl)	6010/7840	ND	50
Vanadium (V)	6010/7910	ND	10
Zinc (Zn)	6010/7950	370	10

Date analysis completed: 03/15/94
ND = Not Detected at Practical Quantitation Limit (PQL).
NA = Not Analyzed or Not Applicable.
Notes: Evidence tape intact.

cc:

Edward S. Babcock & Sons, Inc.

Allison Mack

WALL STREET JOURNAL TUES. SEPT. 13 1994

ERVICES

Calls cost 95¢/minute.

e phone to constantly
ompany news.

2 J-43 M-61 Q-01 U-82 Y-93
3 J-51 N-62 R-72 V-83 Z-03
1 K-52 O-63 S-73 W-91 +-11
2 L-53 P-71 T-81 X-92 .-13
e Enter/Skip #-Portfolio Skip

our choice automatically.
t up or change a portfolio.
a personal ID number and avoid
guide, call 1-800-345-NEWS.

at on-line services.

tour of
Now the
ng the full
you
nt on-line
d Windows™
order,
above.

reprints of any story
rron's and Dow Jones

the Journal. A quick call to

INDUSTRY FOCUS

Garbage-Burning Firm Makes Big Stink Over Dumps

In Unusual Lawsuit, Ogden Corp. Argues for Tougher Regulation of a Rival

By JEFF BAILEY
Staff Reporter of THE WALL STREET JOURNAL

A gentlemanly code of conduct has long prevailed in the trash-disposal industry: one simply doesn't bad-mouth a competitor's environmental record. And with good reason. No company's record is spotless, and increased public concern could subject the entire industry to new regulatory headaches.

But Ogden Corp., the nation's biggest operator of garbage incinerators, is now violating that taboo by declaring environmental war on dumps, the rival and dominant method of disposal. In a little-noticed lawsuit filed in federal court in Philadelphia in May, Ogden seeks to void the permit for a big, recently opened dump near there owned by Browning-Ferris Industries Inc., the nation's second-biggest dump operator.

In what amounts to a test case, New York-based Ogden contends that a dump's vast acreage should go through the same kind of rigorous air-pollution scrutiny that an incinerator's smokestack does.

'Philosophically Opposed'

And Scott Mackin, president and chief operating officer of Ogden's incinerator unit, Ogden Projects Inc., has taken on the added role of chief dump basher: "Any time you take a ton of garbage and put it in a landfill, you're basically storing it in a hole in the ground for future generations. We're philosophically opposed to it."

What's more, Ogden is looking for another dump to sue over air pollution, but, "so it doesn't look like a corporate feud," probably won't pick another Browning-Ferris site, Mr. Mackin says.

The suit raises a legitimate issue. Methane from rotting garbage in dumps is a major source of so-called greenhouse gas, and has been targeted in the Clinton administration's plan to reduce the threat of global warming. New federal rules due out this fall require big dumps to have systems to collect and control gas. And companies and municipalities have begun installing the systems.

Ogden's suit seeks to hold dumps to a higher standard than the new rules. Regulation of dumps under the Clean Air Act is "the biggest issue nobody's paying attention to in the waste business," says Frank McManus, editor of Resource Recovery Report, a Washington, D.C., newsletter that follows alternative disposal.

> Ogden contends that a dump's vast acreage should go through the same kind of rigorous air-pollution scrutiny that an incinerator's smokestack does.

Companies aren't happy about Ogden's trying to bring additional regulatory attention to their business. Michael Patton, vice president of Mid-American Waste Systems Inc., a large dump operator, calls Ogden's argument "whiny."

Such talk reflects tough times in the trash business. Expensive incinerators and dumps were built in recent years on the assumption that disposal capacity would be in short supply, keeping dumping prices high. Instead, a glut of disposal space developed, leading to price cutting and fierce competition. Incinerators are hardest hit because they have hefty fixed costs.

The goal of Ogden's lawsuit is to "drive up the cost of landfills across the country," Mr. Mackin says. That would make Ogden's 25 incinerators more competitive.

Effect of Court Rulings

Two Supreme Court rulings this year further undermined the economics of incinerators. First, the court ruled that the ash left over from burning garbage must be tested under costly hazardous-waste rules.

In a separate case, the court struck down a practice known as flow control, used by municipalities to commandeer all the trash within their borders and direct it to a favored disposal site. Because dumping prices at many incinerators are higher than those at nearby dumps, only with flow control were those burners guaranteed a steady supply of trash.

Methane until recently has been only a secondary concern at dumps. Most pollution-control features at modern dumps are aimed at keeping ground water clean. Initial regulation of methane was aimed at preventing gas buildups and explosions.

Pollution From Dumps

But the Environmental Protection Agency and some state regulators have begun looking at dumps as air polluters. Browning-Ferris estimates that for every 100 tons of trash in a dump, between five and 10 tons of gas are given off (over a period of up to 40 years).

Dumps are a bigger threat to air quality than to ground water, recent EPA calculations suggest. "It blew us away," Susan Thorneloe, an EPA air quality official, says.

Ogden's complaint is this: The air pollutants that go up its narrow stacks can be precisely measured and regulated; dump operators are only guessing at how much gas a dump generates and the portion of it they can collect. Ms. Thorneloe agrees. "The models are all inaccurate," she says.

Philip Angell, an official of Houston-based Browning-Ferris, says that gas-control systems effectively control emissions from dumps and that Ogden's suit lacks merit.

While Ogden slogs through the courts, it could get banged up in the marketplace. With the Supreme Court ruling on flow control, haulers have more control over where they take trash. And the two biggest, Browning-Ferris and WMX Technologies Inc., increasingly take it to their own dumps. Browning-Ferris alone has [illegible] trucks. Ogden doesn't haul trash, so why pick this fight?

"This is less incendiary than [illegible] of the things they've done to us," Ogden's Mr. Mackin asserts. Browning-Ferris tried unsuccessfully to torpedo Ogden's agreement to build a big incinerator in Montgomery County, Md., he says. It isn't a case of "Oh my God, are we making an enemy?" Mr. Mackin says. "We already had one."

Congress is debating whether to reinstate flow control, but some incinerators are already having to adjust to competition. An Ogden-run incinerator in Lancaster County, Pa., 35 miles from the Browning-Ferris dump Ogden sues, slashed its dump fee in July to $53 a ton from $80 to keep from losing volume.

The county's trash chief, Herb Flosdorf, doesn't want to get stuck in the middle. But to cover his costs at [illegible] dump fee, he has to import [illegible] outside the county, putting [illegible] in direct competition with Browning-Ferris and other dump owners. In a telephone call with a Browning-Ferris official, he stressed that the county isn't the one suing the big hauler. "We're not particularly excited about getting into a spitting contest," Mr. Flosdorf says.

Across the Delaware River in Mercer County, N.J., construction of an Ogden-run incinerator is on hold because of the ban on flow control. Plans to charge more than $100 a ton to dump there would make the plant a tough sell without a guaranteed volume of trash. And an Ogden plant in Onondaga County, N.Y., scheduled to open next spring, could face unexpected competition from cheaper dumps.

"Don't Trash the Desert"

Rec'd 6/14/94 gd
7.1e

Citizens for the Chuckwalla Valley

P.O. Box 397, Desert Center 92239 (619) 392-4722

MS. CAROLYN DOUGLAS (MAILCODE H-8-1)
SUPERFUND, EPA REGION 9
75 HAWTHORNE STREET
SAN FRANCISCO CA 94105

CERTIFIED MAIL RECEIPT # P 239 043 937
RETURN RECEIPT REQUESTED

JUNE 10, 1994

RE: KAISER STEEL DEFUNCT IRON ORE MINE AT EAGLE MOUNTAIN
EPA ID# CA80000053090

Dear Ms. Douglas,

You are probably aware that the Department of Toxic Substance Control ("DTSC") has conducted an investigation of Kaiser's Eagle Mountain mine site February 10th and 11th, 1994. We assume that you have received the DTSC Report of April 7, 1994, since you have been on the mailing list that DTSC put together. However, there is an addendum to this report dated May 20, 1994, and we noticed that there was not an "X" next to your name to indicate that a copy had been forwarded to you. Please find enclosed, a copy of the addendum. There are three (3) comments we wish to make.

Dr. Parker, DTSC toxicologist explained that the levels of constituents that our analysis detected would not trigger regulatory action for further investigation. However, in lieu of the fact that this area is proposed for storm water detention basins for the proposed Eagle Mountain dump, should at minimum trigger a requirement for Kaiser to simply clean this area to prevent any chance of percolation of these materials into our water table. After all, we are assessed on our property taxes for storm water run-off remediation, under the Clean Water Act. The DTSC report concludes "the site does not currently threaten the environment". This is welcome and good news, however, the site will not remain in the state that it's in right now, if this dump does go on line, and it behooves the regulators to start a dump with a clean site, to minimize potential contamination.

The second comment relates to the "slit trenches" or "burn pits" that had automobiles deposited in them ! There were four closed trenches that who knows what is in them. The opened pits were cleaned out before DTSC got to the site, and the County of Riverside Environmental Health Department showed a video of the removal of cars, a smashed barrel, and other debris. The open trenches only had tree limbs and concrete in them during the inspection. Surely, dumping cars and barrels in a trench is not

legal dumping. We are pleased that DTSC has included the clean up of the slit trenches by July, 1995.

Our third comment relates to the heavy metal levels detected in the fine tailings pond. The clay from these ponds will be utilized as part of the liner system in the dump to "protect" our groundwater. Dr. Parker again explained to us, that mining waste are regulated "differently", with regards to classification. We asked, since this material will become a construction material, is it not a reasonable request to analyze the clay further. Dr. Parker and DTSC deferred the issue to the Regional Water Quality Control Board. Unfortunately, the Water Board had approved the dump's waste discharge requirements the day before we had our telcon with DTSC. We explained to the Water Board, during the hearing on Eagle Mountain dump, that the State would be releasing an addendum to their final report, and the fine tailings are one of the issues to be re-addressed. Our concerns fell on deaf ears.

Since we are not sure what documentation has been forwarded to you, we will include enclosures with this missive. They are as follow: Copy of DTSC May 20, 1994 addendum report, copy of letter to Ms. Fair, DTSC outlining issues to be discussed during telcon with Dr. Parker, copy of a letter written by Stephen Lester, Science Director for CCHW, copy of analysis of Eagle Creek area and Fine Tailings pond.

In closing, the Eagle Creek area is currently Federal land, as well as the area that is referred to as the "demolition area" is Federal land. These areas are slated to be given to Kaiser in a land exchange involving the Bureau of Land Management, however Administrative Judges in the Department of Interior has halted the exchange, pending appeals. And lastly, we find it quite odd that the Chief of Program Development and Technical Support for the DTSC has recently gone to work for Browning-Ferris Industries, who coincidentally is the major owner of the firm who wants to put a dump at Eagle Mountain. Thank you very much for your time and energy given to this matter.

Respectfully,

Donna Charpied

Donna Charpied, for
THE CITIZENS FOR THE CHUCKWALLA VALLEY

enc.
cc
Interested Parties

STATE OF CALIFORNIA — ENVIRONMENTAL PROTECTION AGENCY

PETE WILSON, *Governor*

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Region 4
245 West Broadway, Suite 350
.ong Beach, CA 90802-4444

ADDENDUM REPORT

Eagle Mountain Mine
(EMM)

Desert Center, CA 92239
EPA ID # CAD003934890

Inspected by: Richard Hubbell
Dates of Inspection: February 10 & 11, 1994
Report by: Richard Hubbell
Date of Report: April 7, 1994
Addendum Report by: Richard Hubbell
Date of Addendum Report: May 20, 1994

I. Purpose

This Addendum Report (Addendum) supplements the April 7, 1994, Eagle Mountain Mine, COMPLAINT INSPECTION AND SAMPLING REPORT (Report). The Addendum includes factual corrections, grammatical corrections, and supplemental information to the Report.

The conclusions of the Report remain substantively the same. As was stated at the April 8, 1994 meeting, there was no evidence found to support the allegations that hazardous materials were illegally disposed. The site does not currently threaten the environment.

On April 8, 1994, a meeting was held at the Bureau of Land Management (BLM) Palm Springs office involving the Department of Toxic Substances Control (DTSC), Larry & Donna Charpied, Kaiser Resources, Inc. (KRI), Riverside County Environmental Health Services (RCEHS) and BLM. The meeting participants provided additional information, and noted various corrections that should be made in the report. DTSC promised to have a conference call with the Charpieds and a DTSC toxicologist to explain the health risks associated with the soil sample analytical data. The conference call took place May 19, 1994.

On May 19, 1994, DTSC toxicologist Dr. Judy Parker, Sharon Fair, Richard Hubbell, Larry & Donna Charpied, Joe Asbury and John Fanning of RCEHS, participated in a telephone conference call to discuss the health risks associated with the different hazardous constituents found in some of the samples taken at Eagle Mountain. Dr. Parker explained that the level of toluene found in the EC-1-C sample was calculated to be 1/10,000 of the safe level that U.S. EPA would allow for a worst case scenario, that is, a 2 year old child eating the soil for a period of 70 years. Dr. Parker said such levels did not warrant further investigation. Regarding the Fine Tailings Ponds, Dr. Parker reiterated that the ponds are outside DTSC's jurisdiction, and DTSC has no authority to require any further investigation of the ponds.

II. Changes

The thirteen changes to the Report are as follows:

1) Report page 3, first line, should read, "Core Garden...hundreds of drums of hazardous waste excavated, the remaining recovered in 1992".

2) Report page 4, first paragraph, the following sentences should be inserted after the sentence ending with "July, 1995":
"Clean-ups of the scrap & salvage areas, the Central Pit Fueling Area, Powder Magazine, Scrap Staging Area, and East Pit Fueling Area were completed as of April 8, 1994, according to information provided by Kaiser Resources, Inc. However, additional clean-up of the demolition area (which includes the Metallurgical Laboratory, Beneficiation Plant, and the Fine Crusher Area), the Main Shop Fueling Area, and the Open Burn Pits, will be done by July, 1995 under the oversight of Riverside County's Environmental Health Division. The clean-up will include collection of scrap metal and remediation of oil or chemical contamination of the ground."

3) Report page 4, first paragraph, the last sentence which reads:
"In 1988, the mine site and other Kaiser assets were organizationally separated from the Fontana mill site to form Kaiser Resources Inc."
should be changed to read:
"In 1988, the mine site and other Kaiser assets were organizationally separated from the Fontana mill site under the reorganized successor of Kaiser Resources Inc."

4) Report page 7, #6, <u>Fine Tailings Pond</u>, first paragraph, the following sentence should be inserted after the sentence ending with, "...data analysis from water sampling and soil sampling":
"Several documents were noted in the Draft Environmental Impact Report for this site which indicated possible leakage from the ponds in the late 1960s."

5) Report page 7, #6, <u>Fine Tailings Pond</u>, second paragraph, the line which reads:
"...none of high are hazardous waste constituents."
should be changed to read, "...none of which are hazardous constituents."

6) Report page 9, Jan Roberts should be listed as the Kaiser Resources, Inc. (KRI) Director of Eagle Mountain Operations; she does not work for Mine Reclamation Inc. (MRI).

7) Report page 9; in addition to those persons listed as DTSC representatives, Rani Patole, Industrial Hygienist, was also in attendance.

8) Report pages 15 and 16, paragraph five, Open Burn Pits, the numbers of pits should be corrected to read:
"We observed three open trenches which were oriented in an east-west direction, and four closed pits."

9) Report page 16, first paragraph, the following sentence should be inserted after the sentence ending with, "closed pits had been partially reopened at the direction of RCEHS.":
"The "slit trenches" had been filled with construction debris, including wood, pipes, wires, and assorted scrap metals, including automobile bodies, which had then been set afire, and covered over with soil."

10) Report page 16, "V. Sampling and Chain of Custody", third paragraph, the following sentences should be inserted after the sentence ending with, "...below the regulatory levels for toxicity.":
"At the time of the inspection, the Department, Charpieds and Kaiser Resources decided not to analyze the Eagle Creek Wash and Scrap Staging Area samples for volatile organic constituents, since the photo-ionization detector field survey did not detect any organic vapors. Later, however, the Charpieds had the Eagle Creek Wash (EC-1-C) and Scrap Staging Area (SC-1-C) samples analyzed for volatile constituents using EPA Method 8240, and they provided the results to DTSC (Attachment 1A). The EC-1-C sample was found to have 37 parts per billion (ppb) of toluene and 170 ppb of p-isopropyl toluene. The SC-1-C sample was found to have 72 ppb n-butylbenzene, 31 ppb tert-butylbenzene, 92 ppb p-isopropyltoluene, 20 ppb napthalene, 28 ppb n-propylbenzene, 560 ppb 1,2,4-trimethylbenzene, and 220 ppb 1,3,5-trimethylbenzene. DTSC toxicologist Judy Parker, Ph.D., reviewed this data. Dr. Parker concluded that all these constituent levels were well below health risk based clean-up levels established by U.S.EPA, and did not therefore warrant further investigation."

11) Report page 17, first paragraph, Conclusions, the following sentence should be added to the end of the paragraph:
"At the time of the inspection, there were no hazardous wastes found to have been improperly disposed at the mine site."

12) Report page 17, second paragraph, the following sentence should be inserted after the sentence ending with, "... are located outside of the proposed landfill footprint": "...except the Shovel Area - North (SH-2)."

13) Report page 17, second paragraph, the following sentences should be inserted at the end of the paragraph: Two magnetometer profiles were recorded during the inspection; however, their reliability could not be assured due to the widespread presence of magnetite ore tailings throughout the site. The results were inconclusive without more extensive surveys.

14) Report page 17, third paragraph, should be divided into two paragraphs as follows:
"The highest concentration of any hazardous constituent found in the tailings pond was approximately 600 mg/kg of copper. The California hazardous regulatory level for copper is 2,400 mg/kg total copper. Copper is not a federal RCRA hazardous constituent. Therefore, the fine tailings would be regulated under the jurisdiction of the Regional Water Quality Control Board, as explained in section IV. Regulatory Status of Site, Regulatory Definitions B.4. and B.6. on pages 6 & 7 of the Report."

"Based on information provided by the CR-RWQCB, the highest concentration of copper found in the fine tailings pond monitoring wells is 0.09 mg/l, and typically the copper values are much lower. In the worst case, the copper concentration is only 10% of the "objectionable" standard for water quality. These findings corroborate U.S. EPA's rulemaking findings that beneficiation wastes are typically low toxicity and low mobility waste streams."

15) Report page 17, fourth paragraph should include the following statement:

"The Colorado River Regional Water Quality Control Board has the regulatory jurisdiction to determine what levels of heavy metals in the tailings are acceptable for use as landfill liner material, and to prescribe fugitive dust emission controls in the event the tailings are moved."

The staff from the Department of Toxic Substances Control would like to acknowledge the extensive assistance and cooperation we received from the parties who were interested and involved in this complaint investigation, including representatives of the Bureau of Land Management, the Riverside County Department of Environmental Health, the Integrated Waste Management Board, Citizens of the Chuckwalla Valley, Kaiser Resources, Inc., and the Mine Reclamation Corporation.

If further information or clarification concerning the complaint investigation report or this addendum report is needed, please contact Richard Hubbell at (310) 590-5920, or Sharon Fair at (310) 590-5913.

Richard Hubbell
Associate Hazardous Materials Specialist
Surveillance and Enforcement Branch

Date Prepared

Sharon Fair
Unit Chief
Surveillance and Enforcement Branch

Date Reviewed

EAGLE MOUNTAIN MINE
MAILING LIST
Continued

Robert Purdue, Sr. Engr. Geologist
and
LeAnne Chavez, Assoc. WRC Engr.
Colorado River Basin
Regional Water Quality Control Board
73-720 Fred Waring Drive, Suite 100
Palm Desert, CA 92260
FAX: (619) 341-6820

Larry and Donna Charpied
Citizens for the Chuckwalla Valley
P.O. Box 397
Desert Center, CA 92239
FAX: (619) 392-4722

John A. Hinton, Ombudsman
Office of External Affairs
Dept. of Toxic Substances Control
245 W. Broadway, Suite 425
Long Beach CA 90802-4444
FAX: (310) 590-4936

Gerald A. Fawcett, Executive Vice-President
and
Robert Hartman, Environmental Projects Manager
Kaiser Resources, Inc.
8300 Utica Avenue, Suite 301
P.O. Box 2249
Rancho Cucamonga, CA 91729
FAX: (909) 944-4158

Gary Johnson, Senior Vice-President
Mine Reclamation Corp.
960 Tahquitz Canyon, Suite 204
Palm Springs, CA 92262

Kay Ceniceros, Chairperson
Riverside County Board of Supervisors
P.O. Box 1359
Riverside, CA 92502

Dan Roman
and
Robert Roman
44-446 Biskra
Indio, CA 92201

EAGLE MOUNTAIN MINE
MAILING LIST
Revised 2/2/94

John Key
U.S. Dept. of Interior
Bureau of Land Management
CA Desert District
6221 Box Springs Blvd.
Riverside, CA 92507-0714
FAX: (909) 697-5299

Kenneth Cohen, Director
Health Services Agency
and
John Fanning, Director
Dept. of Environ. Health
and
William Katzenstein,
Office of County Counsel
County of Riverside
4065 County Circle Drive
Riverside, CA 92503
FAX: (909) 358-5017

Edgar D. Bailey, Chief
and
Donald Bunn
CA Dept. of Health Services
Radiological Health Branch
601 No. 7th Street
Sacramento, CA 95814
FAX: (916)324-3610

Robert Conheim, Senior Counsel
and
Don Dier, Permitting Branch Manager
and
David Otsubo, Project Manager
CA Integrated Waste Management Board
Permitting and Enforcement Division
8800 Cal Center Drive
Sacramento, CA 95826
FAX: (916) 255-2574

Carolyn Douglas
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, CA 94105-3901
FAX: (415) 744-1044

TO: MS. SHARON FAIR, DEPARTMENT OF TOXIC SUBSTANCE CONTROL
FROM: DONNA AND LARRY CHARPIED
RE: POINTS OF CLARIFICATION OF APRIL 8, 1994 "COMPLAINT INSPECTION AND SAMPLING REPORT", EAGLE MOUNTAIN MINE
APRIL 18, 1994

Dear Ms. Fair,

As a follow up on the April 8, 1994 meeting with your staff and others, regarding the above referenced investigation, and our subsequent telephone conversation, the following is a list of items of clarification. You had requested that we send this to you to enable clarifying certain points that would not be relevant to our up-coming telephone conference with your toxicologist.

Page #3: First line; should read,"hundreds of drums...excavated, the remaining recovered in 1992"(not 1993). Maybe you can recall in December 1993, we left messages on your phone asking about the trucks we see leaving the site. We said that we are glad that we are seeing the clean up activities happening, but we questioned why these activities were happening before the State got there. This information is more or less for your edification, but please make the correction to read as stated above.

Page #7: Fine Tailings Pond: During our meeting we referenced documents from the Draft EIR regarding the tailings pond leaking. The pertinent documents are: March 14, 1969 from Kaiser Steel to the Water Board regarding water accountability of ponds. March 20, 1969 letter from Water Board to Kaiser Steel regarding the same. April 8, 1968 "Tailings Basin Permeability Testwork". September 26, 1968 Kaiser memo. If you do not have any of these documents, we will fax them to you. We did look at the DEIR after the meeting, however I do not remember if the pertinent documents were pointed out to you.

Pages # 11 & 12: Metallurgical lab,beneficiation plant, fine crusher : Are all part of what Kaiser refers to as "demolition area". We concurred that the PCB's had been cleaned, however this was another area you said Kaiser acknowledges need more cleaning, obvious soil contamination from what appeared to be diesel. You had said that your report will indicate further clean-up of the demolition area, and a contract would be written for Kaiser to clean it up. You went on to say that Kaiser could do the work themselves or hire a contractor, but you knew the State would not be involved at that point. We feel it appropriate to clarify that this area needs remediation and include in the July 1995 "target date" (see page 4).

Page 16: Sampling and Chain of Custody: Last paragraph : Hazardous waste constituents WERE DETECTED ! We spoke to Babcock Labs and we will get the QAQC report you requested. Babcock said its 100 pages or so, and we intend to pick them up from the lab some time next week. Further, when you listed the constituents that were detected, under "SC-1-C" you omitted, p-Isopropylbenzene, Napthalen, and p-Propylbenzene. We will discuss "below regulatroy levels" during our tele-conference.

Page 17: Conclusions: First paragraph; will discuss regulatory levels as stated above. Para 2; one sample was collected within footprint, SH-2. The metals in fine tailings pond although not above regulatory limits, warrant further investigation. Compared to analysis provided in EIR, some constituents were almost ten times the level. (We sent you the analysis in EIR when we sent you our analysis). Further, comparing the typical ranges of metals in soils, provided by ATSDR Toxicity Profile, we detected higher than the typical. The State said, during the April 8, 1994 meeting that you defer suitability of the tailings for a dump liner, to the Water Board. Yet, you conclude, "...status of fine tailings material would preclude it from being used

as Class III landfill liner material". You agreed, during the April 8th meeting, and over the telephone, that you prefer to defer that to the Water Board, who refused to participate in this investigation. The blanket statement quoted above, needs to be amended. Further, we would like the State's opinion on the effects of the metals in the tailings with regards to dust. During liner construction, which will be an on-going process, dust will be created, and the likelihood of exposure to metals is dust. Should this item be deferred to the Air Board? Remember our elementary school is virtually across the street !

Mr. William Owen's report to Mr. Guerre regarding magnatometer readings: "Pending analytical results of soil samples..." The report show anomaly and provides two interpretations. Analysis indicate "hits" in the Eagle Creek area. Known carcinogenics have been detected, this area needs further attention. The significance of this, besides detecting known carcinogens, is the Eagle Creek is part of the storm water drainage plan for the dump, where they will build detention areas (map enclosed for your convenience). Before, and during the investigation, you said that this investigation is a separate issue from the dump, and we agreed. However, your report is rife with conclusions relating to the dump. Since the proposed dump does seem to be an issue with your department, we feel you should consider the significance of Eagle Creek in the whole scheme of things.

Lastly, it is worth mentioning, but probably an exercise in futility regarding the slit trenches (Kaiser calls "burn pits"). You may recall, Les Ball told you he had personally been involved with one of the trenches, that unfortunately he never had the opportunity to point out to you, because he had to leave at lunch time the last day of the site inspection, despite our request to go to the trenches before he had to leave. Nonetheless, your report is misleading with regards to these "burn pits". You merely mention that the County uncovered two of them for your inspection. You neglect to recount the video that Joe Asbury showed during the February 9, 1994 meeting, where he showed an AUTOMOBILE being removed, and who knows what else ?!? I know if I dug a big whole on my land and buried cars etc., I would be prosecuted ! Kaiser may be a "solid waste disposal site" (page 5), but automobiles do not constitute mining waste. Further, your report should indicate that the County has an agreement to monitor the dumps in perpetuity, as John Fanning indicated during the inspection.

In closing, we do appreciate your and your staff's efforts and hard work involving this investigation. If you have any questions, please do not hesitate calling us at (619) 392-4722.

Sincerely,

Larry Charpied

Donna Charpied

enc.
1 - MAP

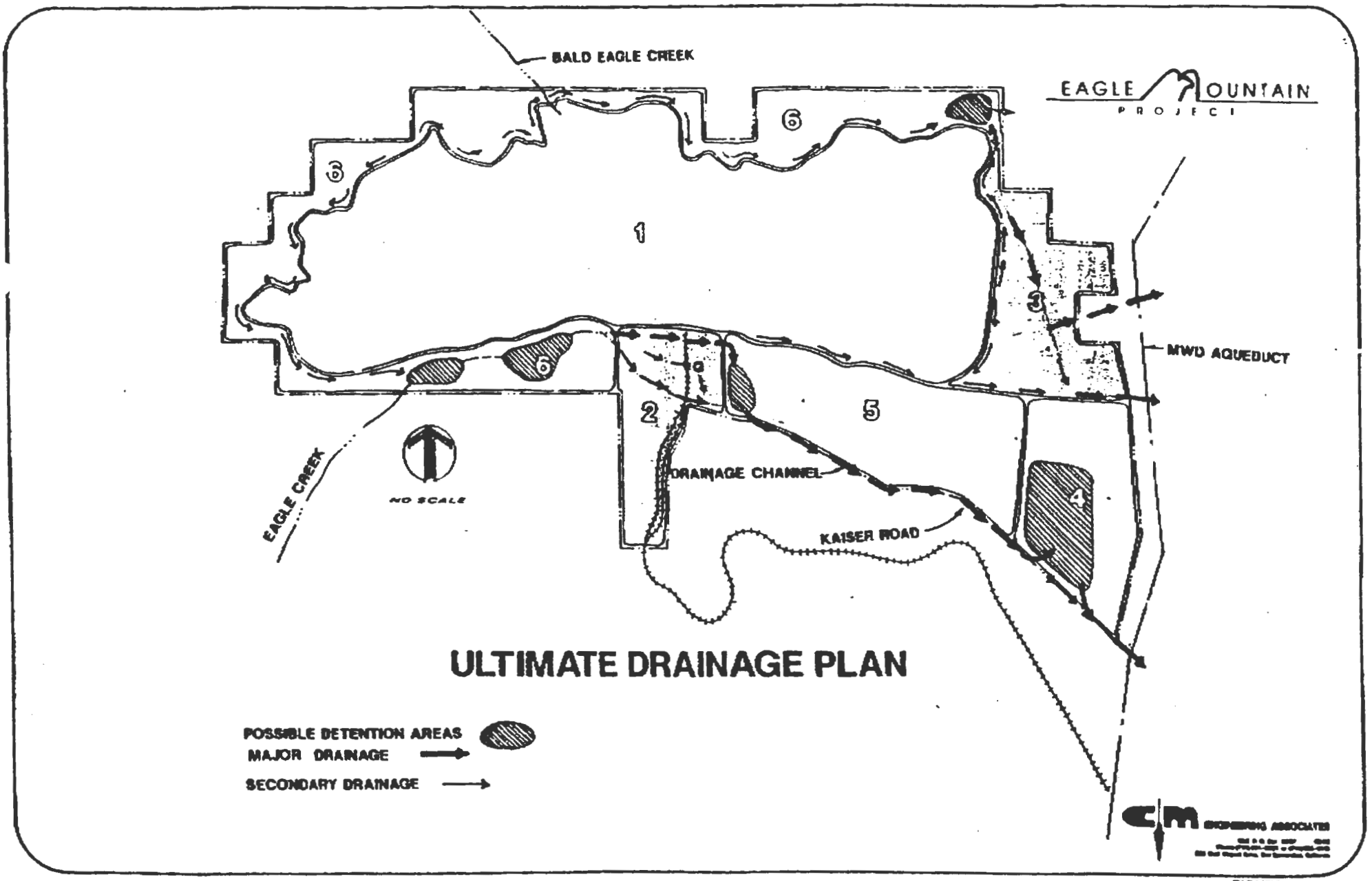


FIGURE A-2

04/11/94 11:42 415552438

VOL 10

Table 1
Laboratory Chemical Analysis Results
Fine Tailing - Sample B2 (12"-18")
Eagle Mountain Project
Riverside County, California

Analysis date: **22 August 1991**

Compound	Concentrations (mg/kg)	Regulatory Levels	
		TTLC mg/kg	STLC mg/l
Arsenic	6.3	500	5
Beryllium	<1	75	0.75
Cadmium	<2.5	100	1
Chromium	15	2500	560
Hexavalent Chromium	<0.05	500	5
Nickel	34	2000	20

TTLC - Total Threshold Limit Concentration
STLC - Soluable Threshold Limit Concentration (based on California Code of Regulations Title 22, Chapter 30, Article 11, Section 66699)

Copyright 1991

BACTERIOLOGY
WATER TESTING
HAZARDOUS WASTE TESTING
CA DHS CERTIFICATION 1156

LABORATORIES
6100 QUAIL VALLEY COURT, RIVERSIDE

E.S. BABCOCK & SONS, INC.
ESTABLISHED 1906

909/653-3351
FAX 909/653-1662

P.O. BOX 432
RIVERSIDE, CA 92502

03/17/94

To: Desert Protection Society
Attn:
73790 El Paseo, Suite B200
Palm Desert, CA 92260

Lab No. 940222-1888
Invoice No. 50780
Customer No. de0661

Sample Marked: FTP-1-C Eagle Mountain Mine
Clay For Liner!

	Submitted	Sampled
By	RH	RH
Date	02/17/94	02/11/94
Time	6:50	09:25

Chain of Custody on File: Y

Sample Matrix	Sample Preparation	Digestion Method
Aqueous liquid	XX Total	EPA 3010
XX Soil	TCLP	EPA 3015
Sludge	CA WET	EPA 3020
Oil		XX EPA 3050
Non-aqueous liquid		EPA 3051

Percent Solids (%) 92.1

Parameter Name	EPA Method	Result mg/kg as received	PQL
Antimony (Sb)	6010/7041	ND	10
Arsenic (As)	6010/7060	55	10
Barium (Ba)	6010/7081	30	10
Beryllium (Be)	6010/7090	ND	5
Cadmium (Cd)	6010/7130/7131	13	5
Chromium (Cr)	6010/7190/7191	13	10
Chromium +6 (hex)	7196	NA	
Cobalt (Co)	6010/7200	170	10
Copper (Cu)	6010/7210	570	10
Lead (Pb)	6010/7420/7421	73	10
Mercury (Hg)	7470/7471	ND	0.5
Molybdenum (Mo)	6010/7480	ND	10
Nickel (Ni)	6010/7520	25	10
Selenium (Se)	6010/7740	22	10
Silver (Ag)	6010/7760/7761	ND	10
Thallium (Tl)	6010/7840	ND	50
Vanadium (V)	6010/7910	ND	10
Zinc (Zn)	6010/7950	370	10

Date analysis completed: 03/15/94
ND = Not Detected at Practical Quantitation Limit (PQL).
NA = Not Analyzed or Not Applicable.
Notes: Evidence tape intact.

cc:

Edward S. Babcock & Sons, Inc.

Common Levels of Heavy Metals in Soil

All values in mg/kg (ppm)

Metals	Typical Range	Maximum	Mean	Avg in US
Arsenic (AS)	1 - 40 0.1 - 4000 (sediment)	27,000 (smelter)	5	2
Barium (BA)	15 - 3000 (surface soil) 70 - 5000 (sub-surface soil)		300 560	
Cadmium (Cd)				.25
Chromium (Ch)	5 - 1500 5 - 71	43,000 (SFS)*		43 (Canada) 72 (smelter)
Cobalt (Co)	1 - 40	800 300 (SFS)	18-25	7.2
Copper (Cu)	1 - 50	6,912 (smelter)	18 **	50
Lead (Pb)	10 - 30 30 - 2000 (on Roadways)	10,000	20-70	10
Nickel (Ni)	5 - 5000 Agri. 4 - 80 non-agricultural soil	24,000 (refinery)	26	50
Selenium (Se)	0.05 - 0.09 0.01 - 0.2		24	<2
Zinc (Zn)	10 - 300 <5 - 400 (cultivated) <10 - 2000 (non-cultivated soil)	443 - 1112 (SFS)	50 36 51	

Source: ATSDR Toxicity Profiles 1992-93

** 25 agricultural soil
50 sub/residential soil
100 mixed industrial soil
175 mixed industrial/urban soil

Prepared by Citizens Clearinghouse for Hazardous Wastes, Inc., April, 1994,
CCHW, P.O. Box 6806, Falls Church, VA 22046 (703) 237-2249

BACTERIOLOGY
WATER TESTING
HAZARDOUS WASTE TESTING
CA DHS CERTIFICATION 1156

LABORATORIES
6100 QUAIL VALLEY COURT, RIVERSIDE

E.S. BABCOCK & SONS, INC.
ESTABLISHED 1906

909/653-3351
FAX 909/653-1662

P.O. BOX 432
RIVERSIDE, CA 92502

March 18, 1994

To:
Desert Protection Society
Attn:
73790 El Paseo, Suite B200
Palm Desert, CA 92260

Lab No. 940222-1892
Invoice No. 50781

	Submitted	Sampled
By	RH	RH
Date	02/17/94	02/10/94
Time	06:50	12:30

Chain of Custody on File: Yes

Sample Marked: Eagle Mountain Mine
EC-1-C
soil

EPA Method 8240

	µg/kg		µg/kg
Bromodichloromethane	ND	Toluene	37
Bromoform	ND	Xylenes (total)	ND
Bromethane	ND	Dichlorofluoromethane	ND
Carbon Tetrachloride	ND	Bromobenzene	ND
Chloroethane	ND	Bromochloromethane	ND
2-Chloroethylvinyl ether	*ND	n-Butylbenzene	ND
Chloroform	ND	sec-Butylbenzene	ND
Chloromethane	ND	tert-Butylbenzene	ND
Dibromochloromethane	ND	2-Chlorotoluene	ND
Dichlorodiflouromethane	ND	4-Chlorotoluene	ND
1,1-Dichloroethane	ND	Dibromomethane	ND
1,2-Dichloroethane	ND	cis-1,2-Dichloroethene	ND
1,1-Dichloroethene	ND	1,3-Dichloropropane	ND
trans-1,2-Dichloroethene	ND	2,2-Dichloropropane	ND
1,2-Dichloropropane	ND	1,1-Dichloropropene	ND
cis-1,3-Dichloropropene	ND	Hexachlorobutadiene	ND
trans-1,3-Dichloropropene	ND	Isopropylbenzene	ND
Methylene chloride	**ND	p-Isopropyltoluene	170
1,1,2,2-Tetrachloroethane	ND	Napthalene	ND
Tetrachloroethene	ND	n-Propylbenzene	ND
1,1,1-Trichloroethane	ND	Styrene	ND
1,1,2-Trichloroethane	ND	1,1,1,2-Tetrachloroethane	ND
Trichloroethene	ND	1,2,3-Trichlorobenzene	ND
Trichlorofluoromethane	ND	1,2,4-Trichlorobenzene	ND
Vinyl chloride	ND	1,2,3-Trichloropropane	ND
Chlorobenzene	ND	Trichlorotrifluoroethane	ND
1,2-Dichlorobenzene	ND	1,2,4-Trimethylbenzene	ND
1,3-Dichlorobenzene	ND	1,3,5-Trimethylbenzene	ND
1,4-Dichlorobenzene	ND	Methyl ethyl ketone	***ND
Benzene	ND	Methyl isobutyl ketone	***ND
Ethyl benzene	ND		

Practical Quantitation Limit = 10µg/kg *PQL = 20 µg/kg **PQL = 60 µg/kg
***PQL = 100 µg/kg
ND = None detected at PQL.
Note: Evidence tape intact.

Date analysis completed: 02/23/94

EDWARD S. BABCOCK & SONS, INC

BACTERIOLOGY
WATER TESTING
HAZARDOUS WASTE TESTING
CA DHS CERTIFICATION 1156

LABORATORIES
6100 QUAIL VALLEY COURT, RIVERSIDE

E.S. BABCOCK & SONS, INC.
ESTABLISHED 1906

909/653-3351
FAX 909/653-1662

P.O. BOX 432
RIVERSIDE, CA 92502

March 18, 1994

To:
Desert Protection Society
Attn:
73790 El Paseo, Suite B200
Palm Desert, CA 92260

Lab No. 940222-1893
Invoice No. 50781

	Submitted	Sampled
By	RH	RH
Date	02/17/94	02/10/94
Time	06:50	16:00

Chain of Custody on File: Yes

Sample Marked: Eagle Mountain Mine
SC-1-C
soil

EPA Method 8240

	µg/kg		µg/kg
Bromodichloromethane	ND	Toluene	ND
Bromoform	ND	Xylenes (total)	ND
Bromethane	ND	Dichlorofluoromethane	ND
Carbon Tetrachloride	ND	Bromobenzene	ND
Chloroethane	ND	Bromochloromethane	ND
2-Chloroethylvinyl ether	*ND	n-Butylbenzene	72
Chloroform	ND	sec-Butylbenzene	31
Chloromethane	ND	tert-Butylbenzene	ND
Dibromochloromethane	ND	2-Chlorotoluene	ND
Dichlorodiflouromethane	ND	4-Chlorotoluene	ND
1,1-Dichloroethane	ND	Dibromomethane	ND
1,2-Dichloroethane	ND	cis-1,2-Dichloroethene	ND
1,1-Dichloroethene	ND	1,3-Dichloropropane	ND
trans-1,2-Dichloroethene	ND	2,2-Dichloropropane	ND
1,2-Dichloropropane	ND	1,1-Dichloropropene	ND
cis-1,3-Dichloropropene	ND	Hexachlorobutadiene	ND
trans-1,3-Dichloropropene	ND	Isopropylbenzene	ND
Methylene chloride	**ND	p-Isopropyltoluene	92
1,1,2,2-Tetrachloroethane	ND	Napthalene	20
Tetrachloroethene	ND	n-Propylbenzene	28
1,1,1-Trichloroethane	ND	Styrene	ND
1,1,2-Trichloroethane	ND	1,1,1,2-Tetrachloroethane	ND
Trichloroethene	ND	1,2,3-Trichlorobenzene	ND
Trichlorofluoromethane	*ND	1,2,4-Trichlorobenzene	ND
Vinyl chloride	ND	1,2,3-Trichloropropane	ND
Chlorobenzene	ND	Trichlorotrifluoroethane	ND
1,2-Dichlorobenzene	ND	1,2,4-Trimethylbenzene	560
1,3-Dichlorobenzene	ND	1,3,5-Trimethylbenzene	220
1,4-Dichlorobenzene	ND	Methyl ethyl ketone	***ND
Benzene	ND	Methyl isobutyl ketone	***ND
Ethyl benzene	ND		

Practical Quantitation Limit = 10µg/kg *PQL = 20 µg/kg **PQL = 60 µg/kg
***PQL = 100 µg/kg
ND = None detected at PQL.
Note: Evidence tape intact. Diesel fuel was present in this sample.

Date analysis completed: 02/24/94

EDWARD, S. BABCOCK & SONS, INC.

Citizens Clearinghouse for Hazardous Waste
Center for Environmental Justice

Board of Directors
Rose Augustine
Clyde Foster
Luella Kenny
Pame Kingfisher
Murray Levine, Ph.D.
Kenneth Miller, M.D.
Beverly Paigen, Ph.D.
Suzi Ruhl Esq.
Alonzo Spencer

General Counsel
Ron Simon, Esq.

Executive Director
Lois Marie Gibbs

National Office Staff
Deborah K. Carpenter
John Gayusky
Kim Guenther
Stephen Lester
Natasha Perkins
Rochelle Smith
Pamela K. Stone
Michael Williams
Anne Yastremski

National Office
119 Rowell Court
P.O. Box 6806
Falls Church, VA 22040
(703)237-CCHW

Regional Offices
Pete Castelli
P.O. Box 639
Floyd, VA 24091
(703)745-3400

Calvin Mitchell
P.O. Box 88011
Indianapolis, IN 46208
(317)923-5239

Cynthia Smith
210 Tenth Street NE
Suite #106
Atlanta, GA 30309
(404)875-3533

Anna Marie Stenberg
254 1/2 Wall Street
Ft. Bragg, CA 95437
(707)964-9109

Printed on Recycled Paper

April 20, 1994

Larry and Donna Charpied
Citizens for the Chuckwalla Valley
P.O. Box 397
Desert Center, CA 92239

Dear Ms. Charpied:

At the request of the Citizens for the Chuckwalla Valley and The Desert Protection Society, I have reviewed the analysis of soil samples taken from the Eagle Mountain mine site by the Surveillance and Enforcement Branch of the California State Department of Toxic Substance Control. Samples from this site were analyzed by both E.S. Babcock & Sons and by the state of California. These comments address the analyses conducted by E.S. Babcock.

It is my understanding that these samples were taken from an area that is being considered for use as a regional landfill that would accept as much as 20,000 tons of garbage, daily. More specifically, several of these samples were taken from soil that would be used as liner and cover material for the proposed landfill. After reviewing this data, there are several concerns and issues that I would like to raise with respect to the public's health and safety particularly with regard to using this soil as liner and cover material for the proposed landfill.

Overall, the results of this testing indicate that the levels of detected metals generally fall below levels that would trigger regulatory action. However, in almost all samples, there are levels of select metals that are generally "high" when compared to typical levels found in soil, according to the Agency for Toxic Substances and Disease Registry (ATSDR) Toxicity Profiles, 1992-93. For example, sample "FTP-1-C" contained levels of arsenic, cadmium, cobalt, copper, lead, selenium and zinc that were above typical levels reported in the ATSDR reports. I have prepared a chart summarizing the data on metals in soil from the ATSDR reports for your use and convenience.

Based on this comparison, the analysis completed by Babcock show above normal levels of many heavy metals. What's not clear from this analysis is any sense of what background levels are for these metals. Are the typical ranges reported by ATSDR typical for the Eagle Mountain area? Are the local background levels higher or lower than the ATSDR levels? These questions can only be answered by collecting and analyzing "background" soil tests. Background

sites would be areas not affected by the mine site and or another source of pollution. It might also be useful to contact the U. S. Geological Survey who typically map the geology of regions around the country. They may have readily available reports that define the typical heavy metal levels found in soil in the Eagle Mountain area. I image there is a regional office nearby that you could contact.

Even if it turns out that the reason for the high levels of heavy metals in the soil at the site of the proposed Eagle Mountain landfill is due to high background levels, one must question the use of this soil as cover and liner material for the landfill. The reason for this concern is that research conducted by EPA on clay soil used as liner material indicate that organic chemicals present in leachate generated in landfills will interact with the clay causing the "liner" to deteriorate. This will result in leaching of organic substances present in landfill leachate from the landfill. This research lead EPA to abandon the use of clay as liner material in favor of plastic. Several technical papers describing this research are enclosed.

The significance of this research is that clay soil should not be used as liner material. If it is used, it likely will result in liner failure and leakage of toxic substances present in the landfill leakage into local groundwater. Clearly, any threat to contaminate groundwater in the desert community surrounding the proposed landfill site is a serious issue that must be fully addressed.

More testing of the area and soil needs to be done to address these questions. Additional samples should be taken and analyzed from the area(s) that would be used as liner and cover material. The number of samples taken should be sufficient that a reasonable person would be comfortable that the number and range of sample locations accurately represents the soil that would be used for liner and cover material. Samples should also be taken from depths as far as the soil is likely to be taken from the site.

Another concern I have is that soil containing heavy metals is carried as dust to areas of the community where people could be exposed. Following groundwater contamination, the most likely route of exposure at this site is by inhalation of dust carried from the site by winds. Heavy metals such as arsenic, lead, cadmium and chromium all can be toxic if inhaled. The skin, kidney, central nervous and reproductive systems are all subject to attack by these metals. People with respiratory problems would be especially susceptible and vulnerable to exposure by this pathway.

Until more testing of the soil is done, precautions should be taken to avoid disturbing this soil in ways that allow the soil to be dispersed and carried away as airborne dust. Using this soil as liner material would mean excavating the soil and creating storage piles for future use. The excavating activity would unavoidably generate dust. What steps would be taken to reduce generating and dispersing dust? How would the storage piles be covered? Would the piles be wet down every day to reduce generating dust? How practical would this be? Would it be done at all? These are all important questions that need to be answered before making a final decision about the use of this soil as liner and cover material for the proposed landfill.

I am also concerned with the constituents detected in the samples labeled "SC-1-C" and "EC-1-C." Isopropyl toluene, naphthalene, propyl benzene, trimethyl benzene and butyl benzene were found in one sample; toluene and isopropyl toluene in the other. These chemicals are not typical constituents of any normal soil and are indicative of some form of industrial contamination. Why would these substances be present? Is their presence a fluke or are there areas with higher or lower levels of similar contamination? Are there more severe levels of contamination? What is the true picture of the range of contaminants present in the soils? These are legitimate questions that need to be answered.

I strongly recommend that the state thoroughly investigate whether this soil is contaminated with industrial chemicals. This would require more testing over a wider area and to greater depths. If additional contamination is found, use of this soil as liner and cover material should be abandoned.

In closing, I hope these comments are helpful. Feel free to contact me at any time if you have any questions or if you need to discuss the data or my comments in any detail.

Sincerely,

Stephen Lester, M.S.
Science Director

SL:cd

Enclosures

cc: Desert Protection Society

STATE OF CALIFORNIA — ENVIRONMENTAL PROTECTION AGENCY

PETE WILSON, *Governor*

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Region 4
245 West Broadway, Suite 350
Long Beach, CA 90802-4444

Rec'd 3/30/94 cyd

M E M O R A N D U M

TO: Eagle Mountain Mailing List

FROM: Richard Hubbell RH
Department of Toxic Substances Control
Region 4 Surveillance and Enforcement
245 West Broadway, Suite 425
Long Beach, California 90802-4444

CAD000053090

DATE: March 25, 1994

SUBJECT: Eagle Mountain Sampling Results Meeting Rescheduling

---

Due to a laboratory equipment breakdown, the Department of Toxic Substances Control (DTSC) sample analysis results for the samples taken on February 10 & 11, 1994 at Eagle Mountain will be delayed until after March 30, 1994. This has forced a rescheduling of the meeting we had scheduled for that date to Friday April 8, 1994. Having talked to many of you on the telephone it appears this date is the most workable. I apologize for the incovenience this rescheduling has caused and I appreciate your cooperation in this matter.

If you have any questions, please call me at (310) 590-5920 or Sharon Fair at (310) 590-5913.

recycled paper

EAGLE MOUNTAIN MINE
MAILING LIST
Revised 2/2/94

John Key
U.S. Dept. of Interior
Bureau of Land Management
CA Desert District
6221 Box Springs Blvd.
Riverside, CA 92507-0714
FAX: (909) 697-5299

Kenneth Cohen, Director
Health Services Agency
and
John Fanning, Director
Dept. of Environ. Health
and
William Katzenstein,
Office of County Counsel
County of Riverside
4065 County Circle Drive
Riverside, CA 92503
FAX: (909) 358-5017

Edgar D. Bailey, Chief
and
Donald Bunn
CA Dept. of Health Services
Radiological Health Branch
601 No. 7th Street
Sacramento, CA 95814
FAX: (916)324-3610

Robert Conheim, Senior Counsel
and
Don Dier, Permitting Branch Manager
and
David Otsubo, Project Manager
CA Integrated Waste Management Board
Permitting and Enforcement Division
8800 Cal Center Drive
Sacramento, CA 95826
FAX: (916) 255-2574

Carolyn Douglas
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, CA 94105-3901
FAX: (415) 744-1044

EAGLE MOUNTAIN MINE
MAILING LIST
Continued

Robert Purdue, Sr. Engr. Geologist
and
LeAnne Chavez, Assoc. WRC Engr.
Colorado River Basin
Regional Water Quality Control Board
73-720 Fred Waring Drive, Suite 100
Palm Desert, CA 92260
FAX: (619) 341-6820

Larry and Donna Charpied
Citizens for the Chuckwalla Valley
P.O. Box 397
Desert Center, CA 92239
FAX: (619) 392-4722

John A. Hinton, Ombudsman
Office of External Affairs
Dept. of Toxic Substances Control
245 W. Broadway, Suite 425
Long Beach CA 90802-4444
FAX: (310) 590-4936

Gerald A. Fawcett, Executive Vice-President
and
Robert Hartman, Environmental Projects Manager
Kaiser Resources, Inc.
8300 Utica Avenue, Suite 301
P.O. Box 2249
Rancho Cucamonga, CA 91729
FAX: (909) 944-4158

Gary Johnson, Senior Vice-President
Mine Reclamation Corp.
960 Tahquitz Canyon, Suite 204
Palm Springs, CA 92262

Kay Ceniceros, Chairperson
Riverside County Board of Supervisors
P.O. Box 1359
Riverside, CA 92502

Dan Roman
and
Robert Roman
44-446 Biskra
Indio, CA 92201

KAISER RESOURCES INC.

Corporate Headquarters
8300 Utica Avenue, Suite 300
Post Office Box 2229
Rancho Cucamonga, CA 91729
909 944-4155
909 944-4158 fax

4726

March 18, 1994

Ms. Sharon Fair
Department of Toxic Substances Control - Region 4
Surveillance and Enforcement Branch
245 West Broadway, Suite 350
Long Beach, CA 90802-4444

CA0000053090

Subject: DTSC Inspection of the Kaiser Resources, Inc. Eagle Mountain Property

Dear Ms. Fair:

As we discussed during the Department of Toxic Substances Control (DTSC) inspection conducted at the Kaiser Eagle Mountain property on February 10 and 11, 1994, there were several follow-up items that were proposed to be conducted by Kaiser. This letter provides a summary of the progress on completion of those items.

certified labs?

The split soil samples retained by Kaiser were submitted to Smith-Emery Company laboratory for chemical analysis. The analytical methods and results are summarized on Table 1 which is attached to this letter. Copies of the laboratory reports are also attached.

No priority organic compounds were detected above the respective detection limits in any of the samples analyzed for semi-volatile and /or volatile organic compounds. No poly-chlorinated biphenyls (PCBs) were detected in the samples from the open burn pits (OBP-1 and 2).

The results of the analyses for metals (total concentrations) indicate the consistent presence of some metals and no detection of other metals (see Table 1). The levels of the metals detected were far below the Total Threshold Limit Concentrations as defined in California Code of Regulations (CCR) Title 22. Only two samples, SC-2 and FTP-1, had detected levels of total copper and copper and lead, respectively, that are greater than ten (10) times the Soluble Threshold Limit Value (STLC) as defined in CCR Title 22 . Considering the metals are in mineral forms, these metals would not be anticipated to be very soluble. The pattern of metals detection appears to be consistent with naturally-occurring metals present at the property, as would be expected in close proximity to a mineralized ore zone. In addition, the levels are within the range of background for soils in the western United States (Element Concentrations in Soils and Other Surficial Material of the Conterminous United States U. S. Geological Survey. Professional Paper 1270. Denver, CO., 1984, and Background Geochemistry of Some Rocks,

Soils, Plants and Vegetables in the Conterminous United States. U. S. Geological Survey. Professional Paper 574-F. Denver, CO., 1975).

There were several areas where surficial oil and/or grease staining was noted during the inspection. Those areas were: area near the underground tunnel powder magazine, area south of the tire shop (scrap staging area), and around the east pit fueling station (near "Jenkensville"). On March 1, 1994, Kaiser personnel used shovels and a loader to remove the surfacial grease and oil-stained soil. The removal was conducted based on visual identification of discolored of soil and did not extend to depths below one (1) foot below ground surface. A total of approximately four (4) cubic yards of material was removed from the three locations. One soil sample was collected from the east pit fueling station and one from the stockpiled soil. No aromatic compounds were detected by EPA method 8020, and total fuel hydrocarbons were detected below 1,000 milligrams per kilogram (mg/kg) by EPA method 8015 (modified for Diesel) for both samples. Analytical laboratory reports are attached. The stockpiled soil will be managed appropriately and in coordination with Riverside County Department of Environmental Health (DEH) requirements.

Kaiser and MRC management held a followup meeting with Mr. and Ms. Charpied regarding the Charpieds allegations of current illegal hazardous materials/ waste activities and/or contamination at the Eagle Mountain property. The meeting resulted in an agreement that the inspection and sampling was properly conducted and that the report from the DTSC will be accepted as the basis for the final resolution of concerns regarding hazardous materials management at the Eagle Mountain property. A copy of the agreement is attached for your information.

Please contact me at (909) 944-4163 should you have questions regarding this information.

Very truly yours,

Rob J. Hartman

Rob J. Hartman
Director of Environmental Projects

Attachments
cc: see attached list

(rjh94/rjh258.doc)

EAGLE MOUNTAIN MINE
MAILING LIST

John Key
U.S. Dept. of Interior
Bureau of Land Management
CA Desert District
FAX: (909) 697-5299

Kenneth Cohen, Director
Health Services Agency
and
John Fanning, Director
Dept. of Environ. Health
and
William Katzenstein,
Office of County Counsel
County of Riverside
4065 County Circle Drive
Riverside, CA 92503
FAX: (909) 358-5017

Edgar D. Bailey, Chief
CA Dept. of Health Services
Radiological Health Branch
601 No. 7th Street
Sacramento, CA 95814
FAX: (916)324-3610

Georgia Turner/Vance Tracy
CA Integrated Waste Management Board
Permitting and Enforcement Division
8800 Cal Center Drive
Sacramento, CA 95826
FAX: (916) 255-2574

Carolyn Douglas
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, CA 94105-3901
FAX: (415) 744-1044

Robert Purdue
Colorado River Basin
Regional Water Quality Control Board
73-720 Fred Waring Drive, Suite 100
Palm Desert, CA 92260
FAX: (619)

EAGLE MOUNTAIN MINE
MAILING LIST
Continued

Mr. and Mrs. Larry Charpied
Citizens for the Chuckwalla Valley
P.O. Box 397
Desert Center, CA 92239

John A. Hinton, Ombudsman
Office of External Affairs
Dept. of Toxic Substances Control
245 W. Broadway, Suite 425
Long Beach CA 90802-4444

Gerald A. Fawcett, Executive Vice-President
Kaiser Resources, Inc.
8300 Utica Avenue, Suite 301
P.O. Box 2249
Rancho Cucamonga, CA 91729

Gary Johnson, Senior Vice-President
Mine Reclamation Corp.
960 Tahquitz Canyon, Suite 204
Palm Springs, CA 92262

TABLE 1. SUMMARY OF THE ANALYTICAL RESULTS OF SOIL SAMPLES COLLECTED AT THE EAGLE MOUNTAIN PROPERTY ON FEBRUARY 10 AND 11, 1994.

Sample #	8240	8270	Sb	As	Ba	Be	Cd	Cr	Co	Cu	Pb	Mo	Ni	Se	Ag	Th	V	Zn	Hg	Other
SH-1	NA	ND	ND	9.5	15	ND	2	6.7	99	200	46	ND	15	ND	ND	ND	5.3	110	0.21	418.1 = 15
EC-1	NA	ND	ND	4.4	110	ND	ND	15	38	120	25	ND	18	ND	ND	ND	30	130	1.9	
SH-2	NA	ND	ND	5.7	17	ND	2.5	6.7	48	170	30	ND	9.5	ND	ND	ND	7	200	0.2	
SC-1	NA	ND	ND	2.6	39	ND	6.0	6.0	23	72	9.5	ND	8.9	ND	ND	ND	11	50	1.0	
SC-2	NA	ND	ND	7.6	74	ND	2.1	12	66	340	38	ND	13	ND	ND	ND	12	410	0.56	
FTP-1	NA	NA	ND	17	27	ND	4.0	9.5	150	530	54	ND	19	ND	ND	ND	9.7	310	0.63	
EPS-1	ND	ND								-	NA	-								
OBP-1	ND	ND	ND	5.0	44	ND	ND	7.3	86	190	38	ND	14	ND	ND	ND	9.5	140	.35	PCBs = ND
OBP-2	ND	ND	ND	10.0	30	ND	ND	7.8	86	240	51	ND	13	ND	ND	ND	6.9	180	ND	PCBs = ND
	Metals:	Mean		7.7	44.5		3.3	8.9	74.5	232.8	36.4		13.8				11.4	191.2	0.63	
		TTLC		500	10,000		100	2,500	8,000	2,500	1,000		2,000				2,400	5,000	20	
		STLC		5.0	100		1.0	5	80	25	5		20				24	250	0.2	

NOTES: All results in milligrams per kilogram (ppm).
8240 means Priority Volatile Organics by EPA method 8240. ND refers to no detection of any individual analytes above the Method Detection Limit (MDL), (see laboratory reports).
8270 means Priority Semi-Volatile Organics by EPA method 8270. ND refers to no detection of any individual analytes above the MDL, (see laboratory reports)
NA means Not Analyzed.
For metals, ND means Not Detected above the Method Detection Limit (MDL), (see laboratory reports).
PCBs means polychlorinated biphenlys as analyzed by EPA mehod 8080. ND refers to no detection of any individual PCB species above the MDL, (see laboratory reports).

3/15/94
(metals1.doc)

STATEMENT REGARDING SITE INSPECTION FOR
HAZARDOUS MATERIALS/HAZARDOUS WASTE

Larry and Donna Charpied requested from the County Board of Supervisors that another site inspection/investigation be done at the Kaiser Iron Ore Mine, with third-party supervision to look for the presence of hazardous materials or waste on-site that has not been properly managed. On February 10 and 11, an investigation was undertaken by Representatives of the Riverside County Local Enforcement Agency, the U.S. Bureau of Land Management, the Cal-EPA/Department of Toxic Substances Control ("DTSC"), the California Integrated Waste Management Board, the Charpieds, Mr. Les Ball, Mine Reclamation Corporation and Kaiser Resources, Inc. and Kaiser Eagle Mountain, Inc. to look at areas of concern raised by Charpieds.

Samples of soil were obtained by DTSC (in triplicate) from selected locations. All areas about which the Charpieds expressed concern were investigated. Either their concerns were satisfied by the inspection, such that sampling was unnecessary, or samples were taken for analysis by DTSC, by the Charpieds and by Kaiser.

Based upon the presence of all parties during investigation and discussions with all parties, the Charpieds are satisfied that the inspection has been properly done and that the results as obtained and the analysis performed and reported in final form by DTSC will be accepted by the Charpieds without question.

In exchange for the above statement by the Charpieds', MRC/Kaiser will drop the taking of the depositions of the Charpieds as previously noticed. This does not preclude taking of future

depositions in other litigation that may arise between parties or the taking of other depositions in the case of new allegations being brought forward by any party that have not previously been a subject of litigation.

We declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 7th day of March, 1994.

Donna Charpied

Larry Charpied

KAISER EAGLE MOUNTAIN, INC.

By:

MINE RECLAMATION CORPORATION

By:

STATE OF CALIFORNIA — ENVIRONMENTAL PROTECTION AGENCY

PETE WILSON, Governor

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Region 4
245 West Broadway, Suite 350
Long Beach, CA 90802-4444

Rec'd 2/3/94 yd

February 1, 1994

Mr. John Fanning, Director
Department of Environmental Health
Health Services Agency
County of Riverside
4065 County Circle Drive
Riverside, California 92503

Dear Mr. Fanning:

SUBJECT: EAGLE MOUNTAIN LANDFILL MULTI-PARTY MEETING & SITE VISIT

This letter is to confirm the schedule for meeting with the private and public entities involved with the proposed Eagle Mountain Landfill and the site tour/sampling exercise. The schedule is as follows:

Wednesday February 9, 1994, 9:30

Meeting to discuss the items on the "SUGGESTED AGENDA FOR INSPECTION" proposed by your office as well as discussion of the Department of Toxic Substances Control (DTSC) site sampling and safety plan.

Location: Bureau of Land Management
Palm Springs/South Coast Resource Area
63-500 Garnett Avenue
P.O. Box 2000
North Palm Springs, California 92258-2000

Parties Represented:

Department of Toxic Substances Control
California Integrated Waste Management Board
Department of Health Services Radiologic Health Branch
Riverside County Department of Environmental Health
Kaiser Resources, Incorporated
Mine Reclamation Corporation
Citizens for the Chuckwalla Valley

Thursday and Friday, February 10 7 11, 1994

Site Tour and Sampling Exercise at Eagle Mountain. Time and logistics to be finalized at the 2/9/94 meeting.

recycled paper

If you have any questions, please contact me at (310) 590-5920 or Sharon Fair at (310) 590-5913.

Sincerely,

Richard Hubbell

Richard Hubbell
Associate Hazardous Materials Specialist
Surveillance and Enforcement Branch

cc's:

John Key
U.S. Dept. of Interior
Bureau of Land Management
California Desert District
6221 Box Spring Blvd
Riverside, California 92507-0714
FAX (909) 697-5299

Kenneth Cohen, Director
Health Services Agency
and
John Fanning, Director
Dept. of Environmental Health Services
and
William Katzenstein,
Office of County Counsel
County of Riverside
4065 County Circle Drive
Riverside, California 92503
FAX (909) 358-5017

Edgar D. Bailey, Chief
California Dept. of Health Services
Radiologic Health Branch
601 North 7th Street
Sacramento, California 95814
FAX (916) 324-3610

Georgia Turner/Vance Tracy
California Integrated Waste Management Board
8800 Cal Center Drive
Sacramento, California 95826
FAX (916) 255-2574

Carolyn Douglas
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, California 94105-3901
FAX (415) 744-1044

Robert Perdue
Colorado River Basin
Regional Water Quality Control Board
73-720 Fred Waring Drive, Suite 100
Palm Desert, California 92260

Mr. and Mrs. Larry Charpied
Citizens for the Chuckwalla Valley
P.O. Box 397
Desert Center, California 92239
John A. Hinton, Ombudsman
Office of External Affairs
Dept. of Toxic Substances Control
245 West Broadway, Suite 425
Long Beach, California 90802-4444

Gerald A. Fawcett, Executive Vice-President
Kaiser Resources, Inc.
8300 Utica Avenue, Suite 301
P.O. Box 2249
Rancho Cucamonga, California 91729

Gary Johnson
Senior Vice-President
960 Tahquitz Canyon, Suite 204
Palm Springs, California 92262

TELEFAX TRANSMITTAL FORM

H-8-1

STATE OF CALIFORNIA
DEPARTMENT OF TOXIC SUBSTANCES CONTROL
SURVEILLANCE AND ENFORCEMENT BRANCH
REGION 4
245 WEST BROADWAY, SUITE 350
LONG BEACH, CA 90802

DATE: 2/1/94

NO. OF PAGES (Including cover) 4

TO : Carolyn Douglas CONTACT NO. _____

FROM : Rich Hubbell CONTACT NO. (310)590-5120

COMMENTS:
Eagle Mountain Site Visit

_____ URGENT/HAND CARRY _____ PER YOUR REQUEST

_____ CONFIDENTIAL _____ PLEASE COMMENT

_____ FOR YOUR INFORMATION ____ ORIGINAL WILL/WILL NOT FOLLOW

_____ PLEASE HANDLE

==========

TELEFAX PHONE NUMBER IS: (310) 590-5907 OR CALNET (8) 635-5907

OFFICE PHONE NUMBER IS: (310) 590-5950 OR CALNET (8) 635-5950

==========

STATE OF CALIFORNIA — ENVIRONMENTAL PROTECTION AGENCY PETE WILSON, Governor

DEPARTMENT OF TOXIC SUBSTANCES CONTROL
Region 4
245 West Broadway, Suite 350
Long Beach, CA 90802-4444

February 1, 1994

Mr. John Fanning, Director
Department of Environmental Health
Health Services Agency
County of Riverside
4065 County Circle Drive
Riverside, California 92503

Dear Mr. Fanning:

SUBJECT: EAGLE MOUNTAIN LANDFILL MULTI-PARTY MEETING & SITE VISIT

This letter is to confirm the schedule for meeting with the private and public entities involved with the proposed Eagle Mountain Landfill and the site tour/sampling exercise. The schedule is as follows:

Wednesday February 9, 1994, 9:30

Meeting to discuss the items on the "SUGGESTED AGENDA FOR INSPECTION" proposed by your office as well as discussion of the Department of Toxic Substances Control (DTSC) site sampling and safety plan.

Location: Bureau of Land Management
Palm Springs/South Coast Resource Area
63-500 Garnett Avenue
P.O. Box 2000
North Palm Springs, California 92258-2000

Parties Represented:

Department of Toxic Substances Control
California Integrated Waste Management Board
Department of Health Services Radiologic Health Branch
Riverside County Department of Environmental Health
Kaiser Resources, Incorporated
Mine Reclamation Corporation
Citizens for the Chuckwalla Valley

Thursday and Friday, February 10 7 11, 1994

Site Tour and Sampling Exercise at Eagle Mountain. Time and logistics to be finalized at the 2/9/94 meeting.

If you have any questions, please contact me at (310) 590-5920 or Sharon Fair at (310) 590-5913.

Sincerely,

Richard Hubbell
Associate Hazardous Materials Specialist
Surveillance and Enforcement Branch

cc's:

John Key
U.S. Dept. of Interior
Bureau of Land Management
California Desert District
6221 Box Spring Blvd
Riverside, California 92507-0714
FAX (909) 697-5299

Kenneth Cohen, Director
Health Services Agency
and
John Fanning, Director
Dept. of Environmental Health Services
and
William Katzenstein,
Office of County Counsel
County of Riverside
4065 County Circle Drive
Riverside, California 92503
FAX (909) 358-5017

Edgar D. Bailey, Chief
California Dept. of Health Services
Radiologic Health Branch
601 North 7th Street
Sacramento, California 95814
FAX (916) 324-3610

Georgia Turner/Vance Tracy
California Integrated Waste Management Board
8800 Cal Center Drive
Sacramento, California 95826
FAX (916) 255-2574

Carolyn Douglas
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, California 94105-3901
FAX (415) 744-1044

Robert Perdue
Colorado River Basin
Regional Water Quality Control Board
73-720 Fred Waring Drive, Suite 100
Palm Desert, California 92260

Mr. and Mrs. Larry Charpied
Citizens for the Chuckwalla Valley
P.O. Box 397
Desert Center, California 92239
John A. Hinton, Ombudsman
Office of External Affairs
Dept. of Toxic Substances Control
245 West Broadway, Suite 425
Long Beach, California 90802-4444

Gerald A. Fawcett, Executive Vice-President
Kaiser Resources, Inc.
8300 Utica Avenue, Suite 301
P.O. Box 2249
Rancho Cucamonga, California 91729

Gary Johnson
Senior Vice-President
960 Tahquitz Canyon, Suite 204
Palm Springs, California 92262

COUNTY OF RIVERSIDE
HEALTH SERVICES AGENCY
4065 County Circle Drive, Suite 421 • RIVERSIDE, CALIFORNIA 92503
OFFICE 909-358-5030
FAX 909-358-4529
TDD 909-358-5124

KENNETH B. COHEN
Director

2/4/94
gd
file

January 27, 1994

CAC000530010

TO: Board of Supervisors

FROM: Kenneth B. Cohen
Director, Health Services Agency

RE: EAGLE MOUNTAIN MINE

The following is a brief status report regarding the site investigation of Eagle Mountain Mine.

For your information, please see the attached letter from Sharon Fair, Unit Supervisor, Surveillance and Enforcement Branch, California Department of Toxic Substances Control (DTSC). This letter confirms the oversight of the Department of Toxic Substances in the investigation of citizen complaints of possible illegal disposal of hazardous wastes at the Eagle Mountain site.

The Department (DTSC) has scheduled a meeting with Mr. and Mrs. Charpied to take place in the next two weeks. At their request, only state agencies will be included at this meeting.

The Department (DTSC) has also tentatively calendared a site inspection to take place during the week of February 7, 1994. A two day walk through is anticipated.

Due to the earthquake in Los Angeles, February 7, 1994, is the earliest time that the Department (DTSC) could calendar the site review.

The County Department of Environmental Health is responding to the request made by the Department (DTSC) for additional information. The County Environmental Health Department is also proceeding to document an agreement with Kaiser Mine restricting the transportation of scrap metals to those times of the day when an inspector is on site.

The County Department of Environmental Health has also adopted the "cc" list recommended by the Department (DTSC) for distribution of correspondence and will be following the suggested protocol.

Please let me know at your earliest convenience if you have any questions or would like any additional information.

KBC:ksd

Attachments

cc: Chief Administrative Officer
Distribution List

File: users\kdufresn\wp\eaglemtn

DEPARTMENT OF TOXIC SUBSTANCES CONTROL
Region 4
245 West Broadway, Suite 425
Long Beach, CA 90802-4444
(310) 590-4868

January 24, 1994

To: Mr. John Fanning, Director
Department of Environmental Health
Health Services Agency
County of Riverside
4065 County Circle Drive
Riverside, CA 92503

Dear Mr. Fanning:

This letter is to confirm our recent telephone conversations concerning the proposed Eagle Mountain landfill, as well as our discussion of December 22, 1993. It is our understanding that the County of Riverside, based upon a recommendation by the County Board of Supervisors, has requested that this Department oversee investigation of citizen complaints alleging possible illegal disposal of hazardous wastes at the Eagle Mountain site. At the time of our meeting, we agreed to review related documentation available for the site. We also agreed to conduct a site inspection, and to make recommendations concerning methods for site characterization and remediation as needed.

"CC" LISTING
Because there are a number of parties who are interested in this matter, we have developed the attached "cc" listing; we will forward copies of all correspondence to those agencies and individuals listed in order to facilitate open communication on this matter. We would encourage those parties, including the County, to follow this procedure. If you know of additional names or agencies which need to be added, please advise us.

MEETINGS AND INSPECTION
This Department has scheduled a meeting with the complainants, to take place within the next two weeks. At their request, we will include only state agencies in this meeting. We have also tentatively calendared a site inspection to take place during the week of February 7, 1994, although the exact dates have yet to be determined. At that time, we anticipate a two-day walk-through of the proposed landfill site, to be accompanied by designated representatives of the involved agencies, as well as representatives from Kaiser Resources Inc., the Mine Reclamation Corporation, and the Citizens for the Chuckawalla Valley. We will contact persons on the attached listing to develop a pre-inspection meeting agenda. We plan to hold a one-day preparatory meeting to review the allegations, explain the inspection plan, to review site safety concerns and procedures, and use of personal protective clothing and equipment. Sampling of possible wastes which may be found will be done as needed, with split samples provided to the facility owners and to a laboratory designated by the complainants. A follow-up meeting will be

scheduled about one month after this inspection, to review any laboratory analysis results, and to evaluate the need for further site characterization.

REQUEST FOR INFORMATION
In the interim, it is our understanding that there are intermittent reports submitted by the County of Riverside to the Board of Supervisors. We request that excerpts of those reports which address activities related to this site be copied and forwarded to all parties on the attached "cc" listing as soon as they have been presented to the Board. Also, we understand that some hazardous wastes are being removed from this site; we request that copies of all manifests for hazardous wastes be forwarded to this office for review. We also request that copies of permits issued for the asphalt batch plant and the removal of non-hazardous waste from dumpsites on this property be copied and forwarded to us for review.

RECOMMENDATION
It is also our understanding that scrap metals are being taken offsite for recycling, and that a county inspector is screening these loads. However, we have some concern regarding any loads which may be removed during evenings or weekends, when an inspector may not be on the premises. We urge you to consider restricting the transportation of these loads to those times of day when an inspector is onsite.

SUMMARY
We will make every effort to expedite this inspection. It is necessary that we gain some familiarity with the site prior to an insection so as to maximize the outcome for all. Thank you for offering us the opportunity to assist you in this matter; we will endeavor to be objective and even-handed in our approach to this matter. If you have questions or need additional information, please contact me at (310) 590-5913 or Richard Hubbell, Inspector, at (310) 590-5920. Our FAX number is (310) 590-5907.

Sincerely,

Sharon Fair
Unit Supervisor
Surveillance and Enforcement Branch

STATE OF CALIFORNIA - ENVIRONMENTAL PROTECTION AGENCY

PETE WILSON, Governor

DEPARTMENT OF TOXIC SUBSTANCES CONTROL
Region 4
245 West Broadway, Suite 425
Long Beach, CA 90802-4444
(310) 590-4868

47-6

Rec'd 1/27/94 gd

January 24, 1994

To: Mr. John Fanning, Director
Department of Environmental Health
Health Services Agency
County of Riverside
4065 County Circle Drive
Riverside, CA 92503

CA 00000 53090

Dear Mr. Fanning:

This letter is to confirm our recent telephone conversations concerning the proposed Eagle Mountain landfill, as well as our discussion of December 22, 1993. It is our understanding that the County of Riverside, based upon a recommendation by the County Board of Supervisors, has requested that this Department oversee investigation of citizen complaints alleging possible illegal disposal of hazardous wastes at the Eagle Mountain site. At the time of our meeting, we agreed to review related documentation available for the site. We also agreed to conduct a site inspection, and to make recommendations concerning methods for site characterization and remediation as needed.

"CC" LISTING
Because there are a number of parties who are interested in this matter, we have developed the attached "cc" listing; we will forward copies of all correspondence to those agencies and individuals listed in order to facilitate open communication on this matter. We would encourage those parties, including the County, to follow this procedure. If you know of additional names or agencies which need to be added, please advise us.

MEETINGS AND INSPECTION
This Department has scheduled a meeting with the complainants, to take place within the next two weeks. At their request, we will include only state agencies in this meeting. We have also tentatively calendared a site inspection to take place during the week of February 7, 1994, although the exact dates have yet to be determined. At that time, we anticipate a two-day walk-through of the proposed landfill site, to be accompanied by designated representatives of the involved agencies, as well as representatives from Kaiser Resources Inc., the Mine Reclamation Corporation, and the Citizens for the Chuckawalla Valley. We will contact persons on the attached listing to develop a pre-inspection meeting agenda. We plan to hold a one-day preparatory meeting to review the allegations, explain the inspection plan, to review site safety concerns and procedures, and use of personal protective clothing and equipment. Sampling of possible wastes which may be found will be done as needed, with split samples provided to the facility owners and to a laboratory designated by the complainants. A follow-up meeting will be

scheduled about one month after this inspection, to review any laboratory analysis results, and to evaluate the need for further site characterization.

REQUEST FOR INFORMATION
In the interim, it is our understanding that there are intermittent reports submitted by the County of Riverside to the Board of Supervisors. We request that excerpts of those reports which address activities related to this site be copied and forwarded to all parties on the attached "cc" listing as soon as they have been presented to the Board. Also, we understand that some hazardous wastes are being removed from this site; we request that copies of all manifests for hazardous wastes be forwarded to this office for review. We also request that copies of permits issued for the asphalt batch plant and the removal of non-hazardous waste from dumpsites on this property be copied and forwarded to us for review.

RECOMMENDATION
It is also our understanding that scrap metals are being taken offsite for recycling, and that a county inspector is screening these loads. However, we have some concern regarding any loads which may be removed during evenings or weekends, when an inspector may not be on the premises. We urge you to consider restricting the transportation of these loads to those times of day when an inspector is onsite.

SUMMARY
We will make every effort to expedite this inspection. It is necessary that we gain some familiarity with the site prior to an insection so as to maximize the outcome for all. Thank you for offering us the opportunity to assist you in this matter; we will endeavor to be objective and even-handed in our approach to this matter. If you have questions or need additional information, please contact me at (310) 590-5913 or Richard Hubbell, Inspector, at (310) 590-5920. Our FAX number is (310) 590-5907.

Sincerely,

Sharon Fair
Unit Supervisor
Surveillance and Enforcement Branch

EAGLE MOUNTAIN MINE
MAILING LIST

John Key
U.S. Dept. of Interior
Bureau of Land Management
CA Desert District
FAX: (909) 697-5299

Kenneth Cohen, Director
Health Services Agency
and
John Fanning, Director
Dept. of Environ. Health
and
William Katzenstein,
Office of County Counsel
County of Riverside
4065 County Circle Drive
Riverside, CA 92503
FAX: (909) 358-5017

Edgar D. Bailey, Chief
CA Dept. of Health Services
Radiological Health Branch
601 No. 7th Street
Sacramento, CA 95814
FAX: (916)324-3610

Georgia Turner/Vance Tracy
CA Integrated Waste Management Board
Permitting and Enforcement Division
8800 Cal Center Drive
Sacramento, CA 95826
FAX: (916) 255-2574

Carolyn Douglas
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, CA 94105-3901
FAX: (415) 744-1044

Robert Purdue
Colorado River Basin
Regional Water Quality Control Board
73-720 Fred Waring Drive, Suite 100
Palm Desert, CA 92260
FAX: (619)

EAGLE MOUNTAIN MINE
MAILING LIST
Continued

Mr. and Mrs. Larry Charpied
Citizens for the Chuckwalla Valley
P.O. Box 397
Desert Center, CA 92239

John A. Hinton, Ombudsman
Office of External Affairs
Dept. of Toxic Substances Control
245 W. Broadway, Suite 425
Long Beach CA 90802-4444

Gerald A. Fawcett, Executive Vice-President
Kaiser Resources, Inc.
8300 Utica Avenue, Suite 301
P.O. Box 2249
Rancho Cucamonga, CA 91729

Gary Johnson, Senior Vice-President
Mine Reclamation Corp.
960 Tahquitz Canyon, Suite 204
Palm Springs, CA 92262

COUNTY OF RIVERSIDE
HEALTH SERVICES AGENCY
4065 County Circle Drive, Suite 421 • RIVERSIDE, CALIFORNIA 92503
OFFICE 909-358-5030
FAX 909-358-4529
TDD 909-358-5124

KENNETH B. COHEN
Director

Rec'd 1/31/94 cja

CA0000053090

January 26, 1994

Citizens for the Chuckwalla Valley
Mr. & Mrs. Charpied
P.O. Box 397
Desert Center, CA 92239

RE: JANUARY 13, 1994 LETTER TO HEALTH SERVICES AGENCY ON KAISER RESOURCES EAGLE MOUNTAIN MINE -SECOND STATUS REPORT TO THE BOARD OF SUPERVISORS DATED JANUARY 6, 1994

Dear Mr. & Mrs. Charpied:

I am in receipt of your letter dated January 13, 1994 regarding your concerns over the Department of Environmental Health's handling and response to the pending hazardous waste investigation for the Kaiser Resources Eagle Mountain Mine site. I will attempt to address the concerns and questions you raised. I believe some of your concerns will also be addressed and answered during the pending meeting you will be having with the CAL EPA/Department of Toxic Substances Control.

First, let me address the issue of your requests for the manifests. I was not aware of the fact that our Department of Environmental Health was not the repository for the manifests required for the shipment of hazardous waste from the Eagle Mountain Mine site. I was sincere in my intent to provide you with the requested manifests. I have been advised that the appropriate Agency to request any and all manifests for hazardous waste shipments is as follows:

California Environmental Protection Agency
Department of Toxic Substances Control
Headquarters Office
500 "P" Street
Sacramento, CA 95814
(916) 324-1826

However, in good faith and to be responsive to your concerns we requested copies of all manifests for materials requiring manifesting from Mr. Gerald H. Fawcett, Executive Vice President, Kaiser Resources, Inc. in a letter dated January 20, 1994, which you were copied. Mr. Fawcett has agreed to provide the same and they are enclosed for your information as Attachment #1 (70 single sided pages). As a courtesy to you, there will be no charge for these copies. There will be copying costs associated with this in the future. For your information, I have also included a copy of the California Uniform Hazardous Manifest System Overview

developed by Environmental Health to present the "cradle to grave" management concept the manifest system is intended to provide. Again, the State Department of Toxics is the appropriate Agency for future requests for any other manifest information (Attachment #2).

The issue relating to the "dump" on the Kaiser facility property can more appropriately be addressed in the scoping session I understand is planned with the Department of Toxics.

I apologize for not ensuring a copy of the January 6, 1994, Board Agenda item 3.10 was sent to you personally from this office. However, I understand that you had access to the information, as a matter of public record, prior to the January 11, 1994, Board meeting, as it was posted in the Desert Center Post Office the morning of January 11, 1994.

I believe we are progressing in as expeditious a manner as possible, considering the coordination necessary between the numerous agencies, State, Federal and County, in addressing your allegations of illegal hazardous waste activities occurring at the Eagle Mountain Mine site. I understand by receipt of a fax (January 24, 1994) transmittal from Mrs. Sharon Fair, Unit Supervisor, Surveillance and Enforcement branch of the State Department of Toxics, that a tentative date has been set for the week of February 7th for the site review (You are listed as a recipient of this letter).

Lastly, the Board of Supervisors has directed that the State Department of Toxics provide third party oversight of the pending site survey and this Board directive will be implemented.

The next step is to have all parties now focus on the "on site inspection" using the process approach outlined in Sharon Fair's letter dated January 24, 1994. I hope you will find this acceptable.

Sincerely,

Kenneth B. Cohen, Director
Health Services Agency

KBC:JMF/rz

Attachments

cc: Board of Supervisors
Sharon Fair, State Department of Toxic Substances Control
John M. Fanning, Director, Environmental Health
Bill Katzenstein, County Counsel
Larry Parrish, County Administrative Office
Distribution List

File: \kdufresn\wp\charpied.doc

JUN 11 '94 16:33 KAISER RESOURCES, INC

ATTACHMENT #1

TEXAS WATER COMMISSION
P.O. Box 13087, Capitol Station
Austin, Texas 78711-3087

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form approved, OMB No. 2050-0039, expires 09-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. CAD 003 934 890 — Manifest Document No. 13002

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Kaiser Resources, Inc.
8300 Utica Ave. Ste #301, Rancho Cucamonga CA 91730 92239 04

4. Generator's Phone 909 944-4163 Rob Hartman

A. State Manifest Document Number: 00068826

B. State Generator's ID: 9990L

5. Transporter 1 Company Name: Custom Environmental Transport

6. US EPA ID Number: DED 980 918 858

C. State Transporter's ID:

D. Transporter's Phone: 302 [illegible]

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID:

F. Transporter's Phone:

9. Designated Facility Name and Site Address
Rollins Environmental Services (TX) Inc.
2027 Battleground Rd
Deer Park TX 77536

10. US EPA ID Number: TXD 055 141 378

G. State Facility's ID: TX [illegible]

H. Facility's Phone: 713/930-[illegible]

11A. HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
	a. RQ, Waste Polychlorinated Biphenyls, 9, UN 2315, PG III (Polychlorinated Biphenyls)	002	DM	~~00090~~ 00200	K P
	b.			Act 166	
	c.				
	d.				

I. Additional Descriptions for Materials Listed Above: Flat Bulks HO [illegible] 1139 [illegible]

J. Handling Codes for Wastes Listed Above: M [illegible] K

15. Special Handling Instructions and Additional Information: In case of accident or spill call Chemtrec @ 1-800-424-9300 and mention "Laspacks". Avoid Contact. Do not breathe vapors. Do not wash into sewer or waterway. If undeliverable return to Generator. DOT ERG: 171(a) 31

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, including applicable state 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.

GENERATOR

Printed/Typed Name: Jeannette Roberts — Signature: J. Roberts — Month Day Year: 06 08 93

17. Transporter 1 Acknowledgement of Receipt of Materials — Date

Printed/Typed Name: Charles Hudek — Signature: [illegible] — Month Day Year: 10 08 93

TRANSPORTER

18. Transporter 2 Acknowledgement of Receipt of Materials — Date

Printed/Typed Name — Signature — Month Day Year

19. Discrepancy Indication Space

PER MY PHONE CONVERSATION WITH Rob Hartman THE ABOVE QUANTITY HAS BEEN CHANGED TO REFLECT THE ACTUAL AMOUNT RECEIVED BY RES (TX) INC. Kim Mayo 11/12

FACILITY

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

Printed/Typed Name: L. LESTER (RES TX) — Signature: L. Lester — Date Month Day Year: 10 12 93

TWC-0311 (Rev. 01/01/89) White - original Pink-TSD Facility Yellow-Transporter Green-Generator's first copy

TEXAS WATER COMMISSION
P.O. Box 13087, Capitol Station
Austin, Texas 78711-3087

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form approved. OMB No. 2050-0039, expires 09-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: CAD 003 934 890 — Manifest Document No.: 93002

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address: Kaiser Resources, Inc. 8300 Utica Ave. Ste#301, Rancho Cucamonga CA ~~92239~~ 91730

4. Generator's Phone: 909 944-4163 Rob Hartman

A. State Manifest Document Number: 00068826

B. State Generator's ID: 99906

5. Transporter 1 Company Name: Custom Environmental Transport

6. US EPA ID Number: DED 980 918 858

C. State Transporter's ID: 40756

D. Transporter's Phone: 302/426-2955

7. Transporter 2 Company Name:

8. US EPA ID Number:

E. State Transporter's ID:

F. Transporter's Phone:

9. Designated Facility Name and Site Address: Rollins Environmental Services (TX) Inc. 2027 Battlegrand Rd. Deer Park TX 77536

10. US EPA ID Number: TXD 055 141 378

G. State Facility's ID: HW 5008 9001

H. Facility's Phone: 713/930-2300

11A. HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
	a. RQ, Waste Polychlorinated Biphenyls, 9, UN 2315, PG II (Polychlorinated Biphenyls)	002	DM	00090 ~~00200~~	K ~~R~~	OUTS2981
	b.					
	c.					
	d.					

J. Additional Descriptions for Materials Listed Above: 11a) Bulks HO—

K. Handling Codes for Wastes Listed Above:

15. Special Handling Instructions and Additional Information: In case of accident or spill call Chemtrec @ 1-800-424-9300 and mention "Labpacks". Avoid contact. Do not breathe vapors. Do not wash into sewer or waterway. If undeliverable, return to Generator. DOT ERG: 11(a) 31

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, including applicable state 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.

Printed/Typed Name: X Jeannette Roberts — Signature: X Roberts — Month Day Year: 10 08 93

17. Transporter 1 Acknowledgement of Receipt of Materials — Date

Printed/Typed Name: Charles Hudak — Signature: [signature] — Month Day Year: 10 08 93

18. Transporter 2 Acknowledgement of Receipt of Materials — Date

Printed/Typed Name — Signature — Month Day Year

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. — Date

Printed/Typed Name — Signature — Month Day Year

TWC-0311 (Rev. 01/01/89) White - original Pink-TSD Facility Yellow-Transporter Green-Generator's first copy

TEXAS WATER COMMISSION
P.O. Box 13087, Capitol Station
Austin, Texas 78711-3087

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form approved. OMB No. 2050-0039, expires 09-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. CAD 003 921 890 | Manifest Document No. 15 002

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Kaiser Resources, Inc. 91730
8300 Utica Ave Ste 201, Rancho Cucamonga CA 92739

4. Generator's Phone 909 944-1167 Fax 944-1167

A. State Manifest Document Number 00068826

B. State Generator's ID 99906

5. Transporter 1 Company Name
Cedar Environmental Inc.

6. US EPA ID Number TXD 075 145 558

C. State Transporter's ID 41075

D. Transporter's Phone 307 | 426-7855

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
Rollins Environmental Services (Tx) Inc.
2027 Battleground Rd
Deer Park TX 77536

10. US EPA ID Number TXD 055 141 378

G. State Facility's ID HW 9005 3001

H. Facility's Phone 713/930-7310

11A. HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
	a. RQ, Waste liquid chlorinated biphenyls, 9, UN 2315, PG II (Polychlorinated Biphenyls)	002	DM	00040	K G	0075281
	b.					
	c.					
	d.					

J. Additional Descriptions for Materials Listed Above
11a) Bulks HO -

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information In case of accident or spill call Chemtrec at 1-800-424-9300 and notify Lahacks. Avoid contact. Do not flush into sewer or waterway. If undeliverable, return to generator.
DOT Exp. 11/31

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, including applicable state 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.

GENERATOR

Printed/Typed Name: [illegible] | Signature: [illegible] | Month 11 Day 11 Year 93

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials | Date

Printed/Typed Name: Charles Hart | Signature: [illegible] | Month 11 Day 8 Year 93

18. Transporter 2 Acknowledgement of Receipt of Materials | Date

Printed/Typed Name | Signature | Month Day Year

FACILITY

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. | Date

Printed/Typed Name | Signature | Month Day Year

TWC-0311 (Rev. 01/01/89) White - original Pink-TSD Facility Yellow-Transporter Green-Generator's first copy

ROLLINS
ENVIRONMENTAL SERVICES

PCB CONTINUATION SHEET

STATE MANIFEST DOCUMENT NO: T7 00068826 PAGE 1 OF 1

GENERAL INFORMATION

This format has been prepared and offered ONLY as a convenience for our customer. However, the information required is mandatory to be in compliance with EPA Regulations and RES (TX) Inc. policy. Regulatory Reference: 40 CFR-Part 761.

The PCB Continuation Sheet, if necessary, must accompany the Manifest. Please note: The required information should be indicated in Section 15 of the Manifest, if space permits.

State Manifest Document Number is indicated on the Manifest in Item 4 (8 digits). Please reference this number at the top of each continuation sheet.

COLUMN 1: Indicate RES (TX) Inc. Lab Reference Number (HO-XXXXX-XX) as indicated in Manifest Section 15.

COLUMN 2: Indicate Unique Identifying No. (Maximum of 10 Alpha-Numeric digits) as assigned by generator to EACH PCB article or container and as indicated on each PCB article or container via RES provided label.

COLUMN 3: Indicate type of PCB waste, i.e., transformer, capacitor, oil, debris, etc.

COLUMN 4: Indicate the Date of Removal from service for disposal as indicated on each PCB article or container.

COLUMN 5: Indicate the weight of each PCB article or container in KILOGRAMS only.

COLUMN 6: Indicate the proper PCB Waste Code, i.e, PCB 1 defined as PCB Articles, transformers, capacitors, etc. and PCB 2 defined as PCB Containers.

(1) RES (TX) INC. HO-NUMBER	(2) GENERATOR'S "UNIQUE IDENTIFYING NO." (MAXIMUM 10-DIGITS)	(3) TYPE OF PCB WASTE	(4) DATE OF REMOVAL FROM SERVICE FOR DISPOSAL	(5) WEIGHT KILOGRAMS	(6) PCB WASTE CODE
HO-	KRE-B43-93	Transformer	10/8/93	95	PCB1
↓	KRE-B44-93	↓	↓	↓	↓

CHEMPAK DRUM INVENTORY SHEET

Non-Radioactive Non-Dioxin Non-Explosive

Page 1 of 1

TOMER SITE: Kaiser Pres.

eam # ~~[illegible]~~ HO -	WASTE TYPE:	☐ PIH Haz. Zone:	Chemist/Technician	OSHA Carcinogen: ☐ YES ☒ NO
m # KRE-B43-244-93	☐ Appendix IV/V LP	PIH Description:	CHIMB	INFECTIOUS/MEDICAL WASTE: ☐ YES ☒ NO
e: 10/8/93	☐ Non-Appendix LP			ASBESTOS: ☐ YES ☒ NO
	☐ Aerosols			
	☒ Bulk/Specification	☒ Packing Group: II		

UM TYPE:

1A1- _____ ☐ 1G- _____ ☐ 1H1- _____

1A2- 55 ☐ 4G- _____ ☐ 1H2- _____

HER: _____

☐ Div. 2.1	☐ Div. 2.2	☐ Div. 2.3
☐ Class 3	☐ Div. 4.1	☐ Div. 4.2
☐ Div. 4.3	☐ Div. 5.1	☐ Div. 5.2
☐ Div. 6.1	☐ Div. 6.2	☐ Class 8
☒ Class 9	☐ Non-Dot/Non-Reg	

☐ Lab Pack	☒ Bulk	☐ Reactive
☐ Kiln	☐ Blend	☐ DA
☐ T-OX	☐ S&E	☐ LF
☐ Repack	☒ PCB	☐ Aerosol
☐ 3rd Party - LOCATION: _____		

-RQ

T SHIPPING DESCRIPTION OR GENERIC SHIPPING NAME (Waste Polychlorinated Biphenyls 9,4N2315 (PCB's)

WASTE DESCRIPTION	CONT. TYPE	WEIGHT/VOLUME	RCRA WASTE CODES	STATE CODE	TREATMENT STD. INCIN.	TREATMENT STD. OTHER	COMMENTS
Large PCB Capacitor	M	1 / 100p	NR				
TOTAL WEIGHT ☒ NET ☐ GROSS 100p				APPLY	BARCODE		HERE

TMENT STANDARDS: If Appendix IV/V Lab Pack check INCIN, other — add specific technology or CCWE, CCW

-305 Rev. 4/93

ROLLINS **CHEMPAK** INC.

Drums cubed KRF-XHY-93

PAGE 1 OF 1

TRACKING DOCUMENT FOR STREAM NUMBER(S) HU -	MANIFEST NUMBER(S): 1 X 0006582 6
CUSTOMER: Kaiser	EPA ID NO CAD 063 434 594
LOCATION: Desert Center	DATE SHIPPED: 10/8/93

DRUM NO.	DOT SHIPPING NUMBER	DRUM TYPE	WT	US EPA WASTE NOS	PROP DISP	ACTUAL DISP TSD(1)	ACTUAL DISP TSD(2)	ADDITIONAL INFORMATION
1/2	RQ, waste polychlorinated biphenyls, 9, UN2315 (PCB's) PG II	1A2-55	1000	NR	Kiln			
1/1	↓	↓	↓	↓	↓			

CHEMIST(S): CN

QC TSDF(1)

QC TSDF(2)

CMP-50-310 12/88

CHEMPAK®

Customer Kaiser Permanente

Location Desert Center

Stream # _____ Date 10/7-10/8

DAILY PRODUCTION SHEET

ROLLINS **CHEMPAK** INC.

Personnel

Employee	Classification	Starting Time	Site Hours From	Site Hours To	Finishing Time	Total Hours Travel	Total Hours Straight
C. Hughes	Sprayer	5:30	11:00	6:30	6:30	5 1/2	7 1/2
1	1	7:00	7:00	10:30	12:30	2	3 1/2
M. Rodriguez	Sprayer	5:30	11:00	6:30	6:30	5 1/2	7 1/2
1	1	7:00	7:00	10:30	12:30	2	3 1/2

Per Diem Charges for ~~____~~ People

Material	Quantity	Material	Quantity
Steel Drum: 5 gallon, each		Absorbent (No. of Bags)	8
30 gallon, each		Labels and Placards, each	220
55 gallon, each	2	Safety Equipment, per person	4
85 gallon, each	3	Palletizing, each pallet	—
Fiber Drum: 5 gallon, each	2	Supply and Equipment Van	2
10 gallon, each		Other Lines	20
20 gallon, each	16		
30 gallon, each	4		
____ gallon, each			

Remarks: n/s

CHEMPAK Representative

X Roberts

Customer Representative

CMP 50-240 11/89 PREPARE 3 COPIES AND SIGN: 3RD COPY - GIVE TO CUSTOMER REPRESENTATIVE, 1ST AND 2ND COPIES - RETURN TO OFFICE

ROLLINS
ENVIRONMENTAL SERVICES

PCB CONTINUATION SHEET

STATE MANIFEST DOCUMENT NO: 00068826 PAGE 1 OF 1

GENERAL INFORMATION

This format has been prepared and offered ONLY as a convenience for our customer. However, the information required is mandatory to be in compliance with EPA Regulations and RES (TX) Inc. policy. Regulatory Reference: 40 CFR-Part 761.

The PCB Continuation Sheet, if necessary, must accompany the Manifest. Please note: The required information should be indicated in Section 15 of the Manifest, if space permits.

State Manifest Document Number is indicated on the Manifest in Item 4 (8 digits). Please reference this number at the top of each continuation sheet.

COLUMN 1: Indicate RES (TX) Inc. Lab Reference Number (HO-XXXXX-XX) as indicated in Manifest Section 15.

COLUMN 2: Indicate Unique Identifying No. (Maximum of 10 Alpha-Numeric digits) as assigned by generator to EACH PCB Article or Container and as indicated on each PCB article or container via RES provided label.

COLUMN 3: Indicate type of PCB waste, i.e., transformer, capacitor, oil, debris, etc.

COLUMN 4: Indicate the Date of Removal from service for disposal as indicated on each PCB article or container.

COLUMN 5: Indicate the weight of each PCB article or container in KILOGRAMS only.

COLUMN 6: Indicate the proper PCB Waste Code, i.e., PCB 1 defined as PCB Articles, transformers, capacitors, etc. and PCB 2 defined as PCB Containers.

(1) RES (TX) INC. HO-NUMBER	(2) GENERATOR'S "UNIQUE IDENTIFYING NO." (MAXIMUM 10-DIGITS)	(3) TYPE OF PCB WASTE	(4) DATE OF REMOVAL FROM SERVICE FOR DISPOSAL	(5) WEIGHT KILOGRAMS	(6) PCB WASTE CODE
HO-74135-39	KRE-B43-93	LG CAPS	10/08/93	45	1
↓	KRE-B44-93	↓	↓	↓	↓

ROLLINS
ENVIRONMENTAL SERVICES (TX) INC.
P.O. Box 608, Deer Park, TX 77536, 713/930-2300, FAX 713/930-2316

CONFIRMATION OF RECEIPT OF MANIFESTED WASTE

GENERATOR NAME/ADDRESS: Kaiser Resources Inc
Rancho Cucamanga CA

STATE MANIFEST DOCUMENT NO.: 00068836

DATE OF RECEIPT AT FACILITY: 10-22-93

Enclosed is your original, completely signed Manifest which indicates acceptance of material (with discrepancies as indicated, if any) by Rollins Environmental Services (TX) Inc.

Kathleen Hanna
RES (TX), Inc.

11-12-93
Date

PROGRAM-ID: PTR1722C ROLLINS ENVIRONMENTAL SERVICES () INC
RUN DATE : 11/17/93 CERTIFICATE OF DISPOSAL
RUN TIME : 4:08 PM PAGE: 1

Certificate of Disposal Name and Address	Stream Number	Order Number	Manifest Number	Received Date	Final Disposal
	074135	161050	TX00068826	10/22/93	11/12/93

KAISER RESOURCES INC
8300 UTICA AVE
SUITE 301
RANCHO CUCAMONGA CA 91730
Attn: ROB HARTMAN

RECEIVED DEC 27 1993

Inventory Cntrl Nbr	Customer's Unique Serial Number	CONTAINER Type	CONTAINER Contents	Prod Code	SHP TO	Mthd	Disposal Date
002963540	KRE-B43-93	55SD	CAPACITOR	39		I	11/12/93
002963541	KRE-B44-93	55SD	CAPACITOR	39		I	11/12/93
	Total Containers :	2					

This completes the Certificates of Destruction per Manifest Number TX00068826.

Disposal Methods :	
	'I' - Waste that was incinerated.
	'L' - Waste that was landfilled.
Disposal Facility :	ROLLINS ENVIRONMENTAL SERVICES (TX) INC
	PO BOX 609
	DEER PARK TX 77536
EPA ID:	TXD055141378

Under civil and criminal penalties of law for making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Please call (713) 930-2317 if there are any questions concerning the information on this Certificate of Disposal.

Authorized Agent
ROLLINS ENVIRONMENTAL SERVICES (TX) INC

cc: ROLLINS CHEMPAK CA

CHEMPAK®

ROLLINS **CHEMPAK** INC.

September 16, 1993

ROB J. HARTMAN
KAISER RESOURCES INC.
8300 UTICA AVE., STE 301
RANCHO CUCAMONGA, CA 91730

Dear Mr. Hartman:

Thank you for accepting Rollins proposal #3218.26 (as modified). We look forward to disposing of your waste material. Please find enclosed documentation to be completed, signed, and returned prior to our scheduled service on September 28th. This paperwork will establish three waste streams at the Eagle Mountain facility: 1) Waste oil, 2) PCB capacitors, and 3) Generic for OPC.

Please complete designated sections, and sign section N or O on the Waste Data Sheets. Also, fill out and sign the Radiological Certification. Upon completion please return all documentation with your Purchase Order to my attention at the address above.

If you have any questions please contact me directly. Thank you for the opportunity to be of service.

Sincerely,
Rollins Chempak, Inc.

Paul Wraith

Paul Wraith
Project Manager

cc: R. Wahlig
M. Kraemer

II

ROLLINS ENVIRONMENTAL SERVICES

ROLLINS ENVIRONMENTAL SERVICES UNIFORM WASTE DATA SHEET (EXHIBIT B)

(SHADED AREAS COMPLETED BY GENERATOR)

DOC. NO. _____ RES SALES EXEC: # _____ STREAM NO. _____

CUSTOMER NO. _____ CONTRACT NO. _____

A. GENERATOR INFORMATION

1. Generator Name: KAISER RESOURCES, INC.
2. Purchasing Contact: ROB HARTMAN Director (Title) 3. Phone No. (909) 944-4163
4. Technical Contact: ROB HARTMAN Director (Title) 5. Phone No. (909) 944-4163
6. Emergency Contact: ROB HARTMAN Director (Title) 7. Phone No. (909) 944-4163
8. Generator USEPA I.D.: CAD 003934890

B. PICK UP LOCATION

1. Company Name: KAISER RESOURCES, INC.
2. Address (not P.O. Box): #1 COURT STREET (P.O. Box 37)
3. City: Desert Center 4. State: CA 5. Zip Code: 92239
6. Pickup Contact: JAN ROBERTS Director (Title) 7. Phone No. (619) [illegible]

C. MANIFEST INFORMATION (If same as "B" write "SAME" but indicate Manifest Contact below if different)

1. Company Name: KAISER RESOURCES, INC.
2. Address: 8300 UTICA AVE., STE 301
3. City: Rancho Cucamonga 4. State: CA 5. Zip Code: 91730
6. Manifest Contact: ROB HARTMAN Director (Title) 7. Phone No. (909) [illegible]

D. INVOICE INFORMATION (If same as "B" or "C" write "SAME" but indicate Invoice Contact below if different)

1. Company Name: Rollins CHEMPAK, Inc.
2. Address: 37777 Spinnaker Ct.
3. City: Fremont 4. State: CA 5. Zip Code: [illegible]
6. Invoice Contact: Tina Carbarino Accountant (Title) 7. Phone No. (510) [illegible]

E. GENERAL WASTE DESCRIPTION

1. Name of Waste: Large PCB Capacitors
2. Process Generating Waste: Electrical Equipment Replacement

F. SHIPPING INFORMATION

1. DOT Shipping Name: RQ, Hazardous Substance, Liquid, n.o.s. (polychlorinated biphenyls)
2. DOT Hazard Class: ORM-E 3. DOT (UN/NA) No.: NA9188 4. RQ (lbs.): 1

G. METHOD OF SHIPMENT

1. ☒ Drums: Type/Size: 17C/55 2. ☐ Bulk: Type/Size: _____
3. ☐ Other (Please be specific): _____
4. ☐ Transportation Requirements: _____
5. Yes ☐ No ☒ Customer to Transport 6. Yes ☐ No ☒ Truck Scale at Customer Site

H. REGULATORY INFORMATION

Yes

1. ☒ DOT Regulated Material
2. ☒ TSCA Regulated PCB
   ☐ <50 ppm ☐ 50-500 ppm ☒ >500 ppm
3. ☒ Disposal State Regulated Material
   Disposal State Waste Code No.: _____
4. State Generator's I.D. No.: _____

REGULATORY COMPLIANCE

No

5. ☒ EPA RCRA Hazardous Waste
6. ☒ Dioxin Waste
7. ☒ Infectious Waste
8. ☒ Radioactive Material
9. ☒ OSHA Carcinogens

CET

CUSTOM ENVIRONMENTAL TRANSPORT
P.O. Box 2349
Wilmington, DE 19899

Location: 350 LOS ANGELES

350 38170

Manifest # 9314[illegible]	Customer: CHEMPSK	Order: PLT DATE 10/27	
Res B/L #	To be billed: CHEMPAK	Placed by: RACHFORD	

Shipper:	Consignee:
KAISER RESOURCES INC	ROLLINS OPC
# 1 COURT STREETS	5756 ALBA STREET
DESERT CENTER CA A	LOS ANGELES CA

Generators 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, including applicable state regulations.

Shipper Signature _____ Date _____

Loading	Date	Time
Depart Terminal	11-[illegible]	430 A
Arrive Location	11-[illegible]	8[illegible] A
Depart Location	11-[illegible]	1030 A
Arrive Terminal		

Signature [signature]

DO NOT WRITE IN SHADED AREAS

Unloading	Date	Time
In		
Out		

Signature _____

ITEM	STREAM NUMBER	SUF	H	PROPER SHIPPING NAME	LOAD QTY P/U QTY	CONT TYPE	WEIGHT	RATE	TOTAL
				WASTE OIL 1500CGALS					
				pump out 4T Drum					
				P/U 6:30 AM					

MISC. CHARGES

LOADING DET. EXPLANATION HRS @

UNLOADING DET. EXPLANATION HRS @

OTHER:

MILES	TARIFF	ITEM	TRACTOR	TRAILER	DATE	CARRIER	TYPE	TOTAL CHARGES
			1031	121	11-5 ~~10/27~~	CET	516	

SHIPMENT RECEIVED IN GOOD ORDER BY:

RECEIVER'S SIGNATURE _____ DRIVER'S SIGNATURE _____

Stream No. _____

I. WASTE INFORMATION

1.

Chemical Name and Constituent	Concentration (range ± 10%)	CASRN	RQ(lbs.)
Large PCB Capacitors	100%	N/A	1
Containing (>500 ppm) PCB dielectric fluids			

2. Standard capacitor dimensions NOT TO EXCEED 12"(L) x 6"(W) x 30"(H).

3. Maximum weight of capacitors NOT TO EXCEED 125 lbs. each

J. PROPERTIES OF WASTE (For liquids contained in capacitors)

1. Color: Yellow/Brown
2. Odor: Oily/Sweet
3. Ignitability (Flash Point): >140°F
4. Corrosivity: <6.35 mm/yr
5. Boiling Point: >130°F
6. Vapor Pressure: <760 mmHg @ 130°F
7. Physical state at 25°C(77°F): Liquid: >99.5%
8. Viscosity: <100 cps.

K. REACTIVE CHARACTERISTICS

NO	NO	NO	NO
1. ☒ Explosive	2. ☒ Shock Sensitive	5. ☒ Air Reactive	6. ☒ Reactive Cyanide
3. ☒ Pyrophoric	4. ☒ Water Reactive	7. ☒ Oxidizers	8. ☒ Reactive Sulfide

L. ELEMENTAL ANALYSIS

1. **Total Elements:** ☒ ppm (As determined by process knowledge of dielectric fluids.)

TOTAL ELEMENTS							
Antimony (Sb)	<10	Chromium (Cr)	≤ 15	Manganese (Mn)	<500	Silver (Ag)	≤ 15
Arsenic (As)	≤ 15	Chromium VI (CrVI)	<1	Mercury (Hg)	≤ 0.6	Sodium (Na)	<500
Barium (Ba)	≤ 300	Cobalt (Co)	<20	Molybdenum (Mo)	<100	Sulfur (S)	<5,000
Beryllium (Be)	<5	Copper (Cu)	<500	Nickel (Ni)	<200	Thallium (Tl)	<100
Bromine (Br)	0	Fluorine (F)	0	Potassium (K)	<200	Vanadium (V)	<200
Cadmium (Cd)	≤ 3	Iodine (I)	0	Selenium (Se)	≤ 3	Zinc (Zn)	<500
Chlorine (Cl)	<540,000	Lead (Pb)	≤ 15	Silicon (Si)	<500		

2. **Toxicity Characteristic (TC) Elements:**

☒ TCLP metals and organics (D004 thru D017) are less than the regulatory threshold level as determined by process knowledge of dielectric fluid.

☒ TCLP organics (D018 thru D043) are exempt per 40 CFR-PART 261.8.

M. TREATMENT METHOD: ☒ Incineration

N. CERTIFICATION

I hereby certify and warrant that the information supplied on this form and on any attachments or supplements represents a complete and accurate identification and description by the generator company of this waste material, its constituents and its known or suspected hazards.

Signature: Rob J. Hartman Title: Direct[illegible]

Dates: 9/17/93 [illegible]

ROLLINS ENVIRONMENTAL SERVICES

ROLLINS ENVIRONMENTAL SERVICES
UNIFORM WASTE DATA SHEET
(EXHIBIT B)
INSTRUCTIONS

LARGE PCB CAPACITORS

GENERAL INSTRUCTIONS:

1. Shaded areas on the Waste Data Sheet are to be completed by an authorized employee of the generator.
2. Please type or print in black ink.
3. Detailed instructions are included to help you complete the Waste Data Sheet. The letters and numbers which precede each instruction refer to the lettered and numbered entries on the Waste Data Sheet.
4. The Waste Data Sheet must be signed by an authorized employee of the generator, as it is a contractual document.
5. If you have any questions concerning the use of the Waste Data Sheet, please contact your Rollins Environmental Services Account Executive.
6. Make a copy of the completed Waste Data Sheet for your records. Mail the ORIGINAL and all attachments to your Rollins Environmental Services Account Executive.

SECTION A. GENERATOR INFORMATION

1. Generator Name: Enter the name of the generating facility.
2. Purchasing Contact: Enter the name and title of purchasing contact.
3. Phone Number: Enter purchasing contact's phone number.
4. Technical Contact: Enter the name and title of the person who will answer technical questions about the waste.
5. Phone Number: Enter Technical Contact's phone number.
6. Emergency Contact: Enter the name and title of the person who should be contacted in event of any emergency situation involving the waste.
7. Phone Number: Enter Emergency Contact's phone number.
8. Generator USEPA ID: Enter the I.D. issued by the USEPA to the facility generating the waste.
9. Fax Number: Enter the Technical Contact fax number.

SECTION B. PICKUP LOCATION

1. Company Name: Enter the name of the Company at the physical pickup location.

2.-5. Address: Enter the address of the Company at the pickup location (not a P.O. Box).

6. Pickup Contact: Enter the name and title of the person who may be contacted at the pickup location.
7. Phone Number: Enter the Pickup Contact's phone number.

SECTION C. MANIFEST INFORMATION (If same as Section B, write "SAME" but indicate Manifest Contact below if different)

1. Company Name: Enter the name of the Company to which Manifest questions or comments should be directed.

2.-5. Address: Enter the address of the Company to which Manifests should be returned.

6. Manifest Contact: Enter the name and title of the person who should be contacted in the event that Manifest questions or comments occur.
7. Phone Number: Enter the Manifest Contact's phone number.

SECTION D. INVOICE INFORMATION (If same as Section "B" or "C" write "SAME" but indicate Invoice Contact below if different)

1. Company Name: Enter the name of the Company to which the invoice should be mailed.

2.-5. Address: Enter the address of the Company to which the invoice should be sent.

6. Invoice Contact: Enter the name and title of the person to whom the invoice should be sent.
7. Phone Number: Enter the Invoice Contact's phone number.

Please Note: Parts of Sections E thru Sections M have been completed by Rollins Environmental Services in accordance with the acceptance guidelines and the perm requirements of Rollins Environmental Services (TX) Inc. Please review all sections thoroughly before signing this contractual document. If your was material does not conform to this waste data sheet as completed or you are in disagreement with any of its content, DO NOT complete or sign this docume You should consult with your Rollins Account Executive concerning the completion of a standard waste data sheet. The below instructions will indicate o those shaded areas of the waste data sheet (Section G thru Section N) where the generator is required to complete.

SECTION G. METHOD OF SHIPMENT

1. Drums: Indicate type and size (i.e. 17C/55 Gallon; 55 Gallon Polydrum: DOT spec 21C under exception E-7758 for PCB solids only).
3. Other: Indicate other methods of shipment.
4. Transportation Requirements: Indicate any special transportation requirements (i.e. security clearance requirec prior to entry).
5. Indicate if customer is to handle transportation.
6. Indicate if truck scale available at customer site.

SECTION H. REGULATORY INFORMATION AND COMPLIANCE

3. Enter the appropriate destination facility state waste code number (call "Reference Agencies" listed on page 2 for appropriate state number; destination facility nu required for the states of Texas and Missouri only). (Column "I" on Uniform Manifest).
4. Enter the appropriate state generator's identification number (Item "B" on Uniform Manifest), if not applicable enter "N/A".

SECTION N. CERTIFICATION

The Waste Data Sheet is a contractual representation of the waste material. The Waste Data Sheet must be completed and signed by a knowledgeable and autho employee of the generator of the waste.

OSHA CARCINOGENS

Acrylonitrile (vinyl cyanide)	Inorganic arsenic	4-Aminodiphenyl
4-Nitrobiphenyl	Coke oven emissions	beta-Propiolactone
Methyl chloromethyl ether	1,2-dibromo-3-chloropropane	4-Dimethylaminoazobenzene
3,3'-Dichlorobenzidine (and its salts)	Asbestos	Vinyl chloride
Benzidine	alpha-Naphthylamine	Ethylene oxide
Ethylenemine	bis-Chloromethyl ether	Formaldehyde
2-Acetylaminofluorene	beta-Naphthylamine	4,4'-Methylene bis (2-chloroaniline)

TOXICITY CHARACTERISTIC (TC) TABLE (40CFR-PART 261.24)

CONSTITUENT	EPA CODE	REGULATORY LEVEL (MG/L)	CONSTITUENT	EPA CODE	REGULATORY LEVEL (MG/L)
Arsenic	D004	5.0	Hexachlorobenzene	D032	0.13
Barium	D005	100.0	Hexachlorobutadiene	D033	0.5
Benzene	D018	0.5	Hexachloroethane	D034	3.0
Cadmium	D006	1.0	Lead	D008	5.0
Carbon Tetrachloride	D019	0.5	Lindane	D013	0.4
Chlordane	D020	0.03	Mercury	D009	0.2
Chlorobenzene	D021	100.00	Methoxychlor	D014	10.0
Chloroform	D022	6.0	Methyl Ethyl Ketone	D035	200.0
Chromium	D007	5.0	Nitrobenzene	D036	2.0
o-Cresol	D023	200.0	Pentachlorophenol	D037	100.0
m-Cresol	D024	200.0	Pyridine	D038	5.0
p-Cresol	D025	200.0	Selenium	D010	1.0
Cresol	D026	200.0	Silver	D011	5.0
2,4,-D	D016	10.0	Tetrachloroethylene	D039	0.7
1,4-Dichlorobenzene	D027	7.5	Toxaphene	D015	0.5
1,2-Dichloroethane	D028	0.5	Trichloroethylene	D040	0.5
1,1-Dichloroethylene	D029	0.7	2,4,5-Trichlorophenol	D041	400.0
2,4-Dinitrotoluene	D030	0.13	2,4,6-Trichlorophenol	D042	2.0
Endrin	D012	0.02	2,4,5-TP(Silvex)	D017	1.0
Heptachlor (and its epoxide)	D031	0.008	Vinyl Chloride	D043	0.2

REFERENCE AGENCIES:

Department of Transportation (DOT) Hotline 202-366-4488
RCRA Hotline: 1-800-424-9346
TSCA Hotline: 202-554-1404
Texas Water Commission: 512-463-8175
Louisiana Department of Environmental Quality: 504-342-1227
New Jersey Department of Environmental Protection, Division of Hazardous Waste Management: 609-292-8341
Missouri Department of Natural Resources: 314-751-3176
California Department of Health Services, Toxic Substance Control Program: 818-567-3000

ROLLINS ENVIRONMENTAL SERVICES SALES OFFICES

CORPORATE OFFICE
Rollins Environmental Services (SALES) Inc.
Mail To: One Rollins Plaza, P.O. Box 2349
Wilmington, DE 19899
(302) 479-2768 1-800-X-WASTES Fax (302) 479-3339

NEW JERSEY
Rollins Environmental Services (SALES) Inc.
Mail To: P.O. Box 337
Bridgeport, NJ 08014
Ship To: Rt. 322 & I-295
Bridgeport, NJ 08014
(609) 467-3105 Fax (609) 467-1040

LOUISIANA
Rollins Environmental Services (SALES) Inc.
Mail To: P.O. Box 74137
Baton Rouge, LA 70807
Ship To: 13351 Scenic Highway
Baton Rouge, LA 70807
(504) 778-3535 Fax (504) 778-3553

Rollins Environmental Services of LA, Inc.
Mail To: Rt. 2, Box 1200
Plaquemine, LA 70764
Ship To: West Sorrell Road, Gracie Lane
Plaquemine LA 70764
(504) 659-2434 Fax (504) 659-7870

ILLINOIS
Rollins Environmental Services (SALES) Inc.
Mail To: P.O. Box 726
Bensenville, IL 60106
Ship To: Thorndale Business Park #8
1110 W. Thorndale Avenue
Bensenville, IL 60106
(708) 616-9000 Fax (708) 616-9280

TEXAS
Rollins Environmental Services (SALES) Inc.
Mail To: P.O. Box 609
Deer Park, TX 77536
Ship To: 2027 Battleground Road
Deer Park, TX 77536
(713) 930-2300 Fax (713) 930-2334

CALIFORNIA
Rollins Environmental Services (SALES) Inc.
Mail To/Ship To: 3777 Spinnaker Court
Fremont, CA 94538
(415) 226-1680 Fax (415) 490-8152

Rollins Environmental Services (SALES) Inc.
Mail To/Ship To: 1848 E. 55th Street
Los Angeles, CA 90058
(213) 583-6040 Fax (213) 589-5443

ROLLINS ENVIRONMENTAL SERVICES

OLLINS OPC, INC.

ROLLINS ENVIRONMENTAL SERVICES
FORM WASTE DATA SHEET
(EXHIBIT B)

(SHADED AREAS FOR RES USE ONLY)

San Diego Office #003

DOC. NO. _____ RES SALES EXEC: # 170 STREAM NO. CP-

CONTRACT NO. _____ SAMPLE NO. _____ SAMPLE RECEIVED DATE _____

A. GENERATOR INFORMATION

1. Generator Name: KAISER RESOURCES, INC.
2. Purchasing Contact: ROB HARTMAN Director (Title) 3. Phone No. (909) 944-4163
4. Technical Contact: ROB HARTMAN Director (Title) 5. Phone No. (909) 944-4163
6. Emergency Contact: ROB HARTMAN Director (Title) 7. Phone No. (909) 944-4163
8. Generator USEPA I.D.: CAD 003934890

B. PICK UP LOCATION

1. Company Name: KAISER RESOURCES INC.
2. Address (not P.O. Box): #1 Court Street (P.O. Box 37)
3. City: Desert Center 4. State: CA 5. Zip Code: 92239
6. Pickup Contact: Jan Roberts Director (Title) 7. Phone No. (619) 392-4332

C. MANIFEST INFORMATION (if same as "B", write "SAME" but indicate Manifest Contact below if different)

1. Company Name: KAISER RESOURCES, INC.
2. Address: 8300 Utica Ave., Ste 301
3. City: Rancho Cucamonga 4. State: CA 5. Zip Code: 91730
6. Manifest Contact: Rob Hartman Director (Title) 7. Phone No. (909) 944-4163

D. INVOICE INFORMATION (if same as "B" or "C" write "SAME" but indicate Invoice Contact below if different

1. Company Name: Rollins CHEMPAK, Inc.
2. Address: 3777 Spinnaker Court
3. City: Fremont 4. State: CA 5. Zip Code: 94538
6. Invoice Contact: Tina Cardanini Accountant (Title) 7. Phone No. (510) 226-1680

E. GENERAL WASTE DESCRIPTION

1. Name of Waste: Waste Oil
2. Process Generating Waste: Vehicle/Equipment maintenance
3. Quantity Generated: ~ 500 gallons Per year (Year or Month)

F. SHIPPING INFORMATION (check all that apply)

1. Yes ☐ No ☒ EPA RCRA Hazardous Waste 2. ☐ Wastewater or ☒ Non-Wastewater 3. Yes ☐ No ☒ TSCA Waste TSCA Waste Code: _____
4. All applicable EPA Hazardous Waste Codes and subcategories including Characteristic ("D") codes: _____
5. Yes ☐ No ☐ Disposal State Regulated Material 6. Generating State Number: _____ Destination State Waste Code Number: _____
7. Yes ☒ No ☒ DOT Regulated Material 8. DOT Shipping Name: _____
9. DOT Hazard Class: _____ 10. DOT (UN/NA) No.: _____ 11. RQ (lbs.): _____

G. METHOD OF SHIPMENT

1. ☒ Drums: Type/Size: 17E/H-55 2. ☒ Bulk: Type/Size: Vacuum Truck
3. ☐ Other (Please be specific): _____
4. ☐ Transportation Requirements: _____
5. Yes ☐ No ☒ Customer to Transport 6. Yes ☒ No ☒ Truck Scale at Customer Site

CUSTOMER REVISION: Signature _____ Date _____

Stream No. _____

H. REGULATORY COMPLIANCE (check all that apply)

Yes No

1. ☐ ☒ OSHA Carcinogens (list below)
   _____ ppm
   _____ ppm
   _____ ppm
2. ☐ ☒ Radioactive Material
3. ☐ ☒ TSCA Regulated PCB (fill in appropriate concentration below):
   ☐ < 50 ppm ☐ 50-500 ppm ☐ > 500 ppm
4. ☐ ☒ Biomedical Waste
   ☐ ☒ Infectious Waste

Yes No

5. ☐ ☒ FIFRA Pesticides with Specific Disposal Requirements
6. ☐ ☒ Asbestos
7. ☒ ☒ Benzene
8. ☐ ☒ California List Regulated Waste
9. ☐ ☒ Solvent Regulated Waste
10. ☐ ☒ Dioxin Regulated Waste (F020, F021, F022, F023, F02 F027, F028)
11. ☒ ☒ First, Second or Third Third Regulated Waste

I. WASTE COMPOSITION (must add up to a minimum of 100%)

1. Chemical Name and Constituent	Concentration (range ± 10%)	CASRN	RQ(lbs.)
Waste Oil	100%		
TOTAL	≥ 100%	—	—

J. PROPERTIES OF WASTE (write "N.A." for all that don't apply)

1. Color: Brown/Black 2. Odor: Strong
3. Ignitability (Flash Point): _____ °F
4. pH N/A or Corrosivity N/A mm/yr
5. Melting Point: N/A °F
6. Boiling Point: _____ °F
7. TOC (Total Organic Carbon): _____ mg/L
8. Viscosity: _____ CPS @ 25°C (77°F)
9. Vapor Pressure <760 mmHg @ 25 °C
10. Bromine: None %
11. Iodine: None %
12. Fluorine: NONE %
13. Chlorine NONE %
14. Sulfur: NONE %
15. ☒ ☐ Flowable at 25°C (77°F)

16. Physical state at 25°C (77°F) and phases by volume (check all apply):
   - ☐ Powder _____ % (phase or ia
   - ☐ Gas _____ %
   - ☒ Sludge/Semisolid <5 %
   - ☒ Liquid >95 %
   - ☐ Solid _____ %
   - ☐ Other _____ _____ %
17. % Solid by Weight: <1
18. Heat of Combustion: >10,000 B
19. Ash: Varies
20. Scrub: Varies lb. NaOH/lb.
21. Specific Gravity: <1.0 or Bulk Density: _____ lb.
22. VOC (Total Volatile Organic Compounds): N/A
23. Phenol (For Landfill Streams): N/A

CUSTOMER REVISION: Signature _____ Date _____

Stream No. _____

K. REACTIVE CHARACTERISTICS (check all that apply)

	Yes	No			Yes	No	
1.	☐	☒	Explosive	6.	☐	☒	Reactive Cyanide: _____ mg/L
2.	☐	☒	Pyrophoric	7.	☐	☒	Reactive Sulfide: _____ mg/L
3.	☐	☒	Shock Sensitive	8.	☐	☒	Oxidizers (specify): _____
4.	☐	☒	Water Reactive	9.	☐	☐	Other (specify): _____
5.	☐	☒	Air Reactive				

L. ELEMENTAL ANALYSIS

(Total Metals and TCLP metals data are required for incineration waste streams. TCLP metals data are required for landfill material. For liquid wastes with less than 0.5% solids, total metals (in mg/kg) x density of waste (in kg/L) = TCLP results (in mg/L).* (Record data for all that apply).

Conform To Metals Guidelines

Total Metals: ☐ mg/kg ☐ mg/L ☐ ppm (Check appropriate unit)

Antimony (Sb)		Copper (Cu)		Selenium (Se)	
Arsenic (As)		Lead (Pb)		Silicon (Si)	
Barium (Ba)		Manganese (Mn)		Silver (Ag)	
Beryllium (Be)		Mercury (Hg)		Sodium (Na)	
Cadmium (Cd)		Molybdenum (Mo)		Thallium (Tl)	
Chromium (Cr)		Nickel (Ni)		Vanadium (V)	
Chromium VI (CrVI)		Potassium (K)		Zinc (Zn)	
Cobalt (Co)					

TCLP	(mg/L)	TC Level		TCLP (mg/L)	TC Level
D004 - Arsenic		5.0	D008 - Lead		5.
D005 - Barium		100.0	D009 - Mercury		0
D006 - Cadmium		1.0	D010 - Selenium		1.
D007 - Chromium		5.0	D011 - Silver		5.

*N.B. - EP Toxicity Characteristic data are acceptable until 9/25/90, or 3/25/91 for small quantity generators.

M. ORGANIC TOXIC CHARACTERISTIC WASTE

(specify EPA waste code and TCLP results (mg/L) for all that apply; see instructions for list).

Not Applicable	mg/L		mg/L		mg
	mg/L		mg/L		mg
	mg/L		mg/L		mg
	mg/L		mg/L		mg

N. RECOMMENDED TREATMENT METHOD (check applicable box)

1. ☒ Incineration
2. ☐ Incineration with chemical stabilization and encapsulation of residues
3. ☐ Chemical stabilization and encapsulation
4. ☐ Direct landfill
5. ☐ Underground injection
6. ☐ Chemical treatment
7. ☐ Other (specify) _____

O. CERTIFICATION

I hereby certify and warrant that the information supplied on this form and on any attachments or supplements represents a complete and accurate identification and description by the generator company of this waste material, its constituents and its known or suspected hazards.

Signature Kel J Hartman Title: Director of Enviro Projec

Date: 9/20/93

CUSTOMER REVISION: Signature _____ Date _____

Stream No. _____

P. POLYCHLORINATED BIPHENYL (PCB) ITEMS

1. LIQUIDS:

   a. Name of Original Fluid: _____

   b. Name of Solvent: _____

   c. PCB Concentration: _____ pp

   d. Shipping Weight: _____ kilogra

2. CAPACITORS:

   a. Quantity: _____

   b. Shipping Weight: _____ kilogra

3. TRANSFORMERS AND REGULATORS:

   a. Dimensions: _____

   b. Nameplate Gallons: _____ gallo

   c. PCB Concentration: _____ pp

   d. Shipping Weight: _____ kilograr

   e. To Be Shipped: ☐ Full ☐ Drained Only ☐ Drained and Flushed

4. OTHER TYPES OF PCB ARTICLES (Be specific):

   a. Name: _____

   b. Quantity: _____ Shipping Container: _____

   c. Shipping Weight: _____ kilogra

   d. PCB Concentration: _____ p

ROLLINS ENVIRONMENTAL SERVICES SALES OFFICES

CORPORATE OFFICE
Rollins Environmental Services (SALES) Inc.
Mail To: One Rollins Plaza, P.O. Box 2349
Wilmington, DE 19899
(302) 479-2768 1-800-X-WASTES Fax (302) 479-3339

NEW JERSEY
Rollins Environmental Services (SALES) Inc.
Mail To: P.O. Box 337
Bridgeport, NJ 08014
Ship To: Rt. 322 & I-295
Bridgeport, NJ 08014
(609) 467-3105 Fax (609) 467-1040

LOUISIANA
Rollins Environmental Services (SALES) Inc.
Mail To: P.O. Box 74137
Baton Rouge, LA 70807
Ship To: 13351 Scenic Highway
Baton Rouge, LA 70807
(504) 778-3535 Fax (504) 778-3553

Rollins Environmental Services of LA, Inc.
Mail To: Rt. 2, Box 1200
Plaquemine, LA 70764
Ship To: West Sorrell Road, Gracie Lane
Plaquemine LA 70764
(504) 659-2434 Fax (504) 659-7870

ILLINOIS
Rollins Environmental Services (SALES) Inc.
Mail To: P.O. Box 726
Bensenville, IL 60106
Ship To: Thorndale Business Park #8
1110 W. Thorndale Avenue
Bensenville, IL 60106
(708) 616-9000 Fax (708) 616-9280

TEXAS
Rollins Environmental Services (SALES) Inc.
Mail To: P.O. Box 609
Deer Park, TX 77536
Ship To: 2027 Battleground Road
Deer Park, TX 77536
(713) 930-2300 Fax (713) 930-2334

CALIFORNIA
Rollins Environmental Services (SALES) Inc.
Mail To/Ship To: 3777 Spinnaker Court
Fremont, CA 94538
(415) 226-1680 Fax (415) 490-8152

Rollins Environmental Services (SALES) Inc.
Mail To/Ship To: 1848 E. 55th Street
Los Angeles, CA 90058
(213) 583-6040 Fax (213) 589-5443

CUSTOMER REVISION: Signature _____ Date _____

ROLLINS ENVIRONMENTAL SERVICES

OPC

ROLLINS ENVIRONMENTAL SERVICES
UNIFORM WASTE DATA SHEET
(EXHIBIT B)

(SHADED AREAS FOR RES USE ONLY) San Diego Br. Rollins CHEMPAK, Inc.

DOC. NO. _____ RES SALES EXEC: # 170 STREAM NO. OP-

CONTRACT NO. _____ SAMPLE NO. _____ SAMPLE RECEIVED DATE _____

A. GENERATOR INFORMATION

1. Generator Name: KAISER RESOURCES, INC.
2. Purchasing Contact: Rob Hartman Director (Title) 3. Phone No. (909) 944-4163
4. Technical Contact: Rob Hartman Director (Title) 5. Phone No. (909) 944-4163
6. Emergency Contact: Rob Hartman Director (Title) 7. Phone No. (909) 944-4163
8. Generator USEPA I.D.: CAD 003934890 California Generator ID No.: CAD 003934890

B. PICK UP LOCATION

1. Company Name: KAISER RESOURCES, INC.
2. Address (not P.O. Box): #1 Court Street (P.O. Box 37)
3. City: Desert Center 4. State: CA 5. Zip Code: 92239
6. Pickup Contact: Jan Roberts Director (Title) 7. Phone No. (619) 392-433

C. MANIFEST INFORMATION (if same as "B", write "SAME" but indicate Manifest Contact below if different)

1. Company Name: KAISER RESOURCES, INC.
2. Address: 3300 Utica Avenue, Ste 301
3. City: Rancho Cucamonga 4. State: CA 5. Zip Code: 91730
6. Manifest Contact: Rob Hartman Director (Title) 7. Phone No. (909) 944-416

D. INVOICE INFORMATION (if same as "B" or "C" write "SAME" but indicate Invoice Contact below if different

1. Company Name: Rollins CHEMPAK, Inc.
2. Address: 3777 Spinnaker Court
3. City: Fremont 4. State: CA 5. Zip Code: 94538
6. Invoice Contact: TINA CARDANINI ACCOUNTANT (Title) 7. Phone No. (510) 226-1680

E. GENERAL WASTE DESCRIPTION

1. Name of Waste: Mixed Lab Packs containing D.O.T. hazard classes (see section I)
2. Process Generating Waste: Laboratory or warehouse
3. Quantity Generated: Various Per pick-up (Year or Month)

F. SHIPPING INFORMATION (check all that apply)

1. Yes ☒ No ☐ EPA RCRA Hazardous Waste 2. ☐ Wastewater or ☒ Non-Wastewater 3. Yes ☐ No ☐ TSCA Waste TSCA Waste Code: _____
4. All applicable EPA Hazardous Waste Codes and subcategories including Characteristic ("D") codes: D001 - D043 "F", "U", "P" series codes
5. Yes ☒ No ☐ Disposal State Regulated Material 6. Generating State Number: _____ Destination State Waste Code Number: _____
7. Yes ☒ No ☐ DOT Regulated Material 8. DOT Shipping Name: Varies
9. DOT Hazard Class: Varies 10. DOT (UN/NA) No.: Varies 11. RQ (lbs.): Varie

G. METHOD OF SHIPMENT

1. ☒ Drums: Type/Size: Various Fiber, Metal, Poly etc. 2. ☐ Bulk: Type/Size: _____
3. ☐ Other (Please be specific): _____
4. ☒ Transportation Requirements: Van trailer
5. Yes ☒ No ☐ Customer to Transport 6. Yes ☐ No ☐ Truck Scale at Customer Site

CUSTOMER REVISION: Signature _____ Date _____

Stream No. _____

H. REGULATORY COMPLIANCE (chec that apply)

Yes No

1. ☒ ☐ OSHA Carcinogens (list below)
   See inventory sheets _____ ppm
   _____ ppm
   _____ ppm
2. ☐ ☒ Radioactive Material
3. ☐ ☒ TSCA Regulated PCB (fill in appropriate concentration below):
   ☒ < 50 ppm ☐ 50-500 ppm ☐ > 500 ppm
4. ☐ ☒ Biomedical Waste
   ☐ ☒ Infectious Waste

Yes No

5. ☒ ☐ FIFRA Pesticides with Specific Disposal Requirements
6. ☒ ☐ Asbestos
7. ☒ ☐ Benzene
8. ☒ ☐ California List Regulated Waste
9. ☒ ☐ Solvent Regulated Waste
10. ☐ ☒ Dioxin Regulated Waste (F020, F021, F022, F023, F02 F027, F028)
11. ☒ ☐ First, Second or Third Third Regulated Waste

I. WASTE COMPOSITION (must add up to a minimum of 100%)

1.

Chemical Name and Constituent	Concentration (range ± 10%)	CASRN	RQ(lbs.)
Waste Flammable Liquid or Solid	**See detailed drum inventory sheets for		
Waste Corrosive Liquid or Solid	Lab Pack stream		
Waste Poison-B Liquid or Solid			
Waste Oxidizer			
Waste Organic Peroxide Liquid or Solid			
Waste ORM-A			
Waste ORM-B			
Waste ORM-C			
Hazardous Waste Liquid or Solid			
Hazardous Substance Liquid of Solid			
Combustible			
TOTAL	≥ 100%	—	—

J. PROPERTIES OF WASTE (write "N.A." for all that don't apply)

1. Color: _____ 2. Odor: _____
3. Ignitability (Flash Point): _____ °F
4. pH _____ or Corrosivity _____ mm/yr
5. Melting Point: _____ °F
6. Boiling Point: _____ °F
7. TOC (Total Organic Carbon): _____ mg/L
8. Viscosity: _____ CPS @ 25°C (77°F)
9. Vapor Pressure _____ mmHg @ _____ °C
10. Bromine: _____ %
11. Iodine: _____ %
12. Fluorine: _____ %
13. Chlorine: _____ %
14. Sulfur: _____ %
15. ☐ ☐ Flowable at 25°C (77°F)

16. Physical state at 25°C (77°F) and phases by volume (check all : apply):
    - ☐ Powder _____ % (phase or la
    - ☐ Gas _____ %
    - ☐ Sludge/Semisolid _____ %
    - ☐ Liquid _____ %
    - ☐ Solid _____ %
    - ☐ Other _____ _____ %
17. % Solid by Weight: _____
18. Heat of Combustion: _____ BT
19. Ash: _____
20. Scrub: _____ lb. NaOH/lb.
21. Specific Gravity: _____ or Bulk Density: _____ lb
22. VOC (Total Volatile Organic Compounds): _____
23. Phenol (For Landfill Streams): _____

CUSTOMER REVISION: Signature _____ Date _____

Stream No. _____

K. REACTIVE CHARACTERISTICS (check ... that apply)

	Yes	No	
1.	☐	☒	Explosive
2.	☐	☒	Pyrophoric
3.	☐	☒	Shock Sensitive
4.	☒	☐	Water Reactive
5.	☒	☐	Air Reactive
6.	☒	☐	Reactive Cyanide: _____ mg/...
7.	☒	☐	Reactive Sulfide: _____ mg/...
8.	☒	☐	Oxidizers (specify): See inventory sheet.
9.	☐	☐	Other (specify): _____

L. ELEMENTAL ANALYSIS (Total Metals and TCLP metals data are required for incineration waste streams. TCLP metals data are required ... landfill material. For liquid wastes with less than 0.5% solids, total metals (in mg/kg) x density of waste (in kg/L) = TC... results (in mg/L).* (Record data for all that apply).

LAB PACKS CONFORM TO METALS GUIDELIN...

Total Metals: ☐ mg/kg ☐ mg/L ☐ ppm (Check appropriate unit)

Antimony (Sb)		Copper (Cu)		Selenium (Se)	
Arsenic (As)		Lead (Pb)		Silicon (Si)	
Barium (Ba)		Manganese (Mn)		Silver (Ag)	
Beryllium (Be)		Mercury (Hg)		Sodium (Na)	
Cadmium (Cd)		Molybdenum (Mo)		Thallium (Tl)	
Chromium (Cr)		Nickel (Ni)		Vanadium (V)	
Chromium VI (CrVI)		Potassium (K)		Zinc (Zn)	
Cobalt (Co)					

TCLP	(mg/L)	TC Level	TCLP	(mg/L)	TC Le...
D004 - Arsenic		5.0	D008 - Lead		5
D005 - Barium		100.0	D009 - Mercury		0
D006 - Cadmium		1.0	D010 - Selenium		
D007 - Chromium		5.0	D011 - Silver		5

*N.B. - EP Toxicity Characteristic data are acceptable until 9/25/90, or 3/25/91 for small quantity generators.

M. ORGANIC TOXIC CHARACTERISTIC WASTE (specify EPA waste code and TCLP results (mg/L) for all that apply; see instructions for list)

	mg/L	NOT APPLICABLE	mg/L		mg
	mg/L		mg/L		mg
	mg/L		mg/L		mg
	mg/L		mg/L		mg

N. RECOMMENDED TREATMENT METHOD (check applicable box)

1. ☐ Incineration
2. ☐ Incineration with chemical stabilization and encapsulation of residues
3. ☐ Chemical stabilization and encapsulation
4. ☐ Direct landfill
5. ☐ Underground injection
6. ☒ Chemical treatment
7. ☐ Other (specify) _____

O. CERTIFICATION

I hereby certify and warrant that the information supplied on this form and on any attachments or supplements represents a complete and acc... identification and description by the generator company of this waste material, its constituents and its known or suspected hazards.

Signature Kel J. Hartman Title: Director of Enviro Proje...

Date: 9/20/93

CUSTOMER REVISION: Signature _____ Date _____

Stream No. _____

P. POLYCHLORINATED BIPHENYL (PCB) ITEMS NOT APPLICABLE

1. LIQUIDS:

a. Name of Original Fluid: _____

b. Name of Solvent: _____

c. PCB Concentration: _____ P

d. Shipping Weight: _____ kilogra

2. CAPACITORS:

a. Quantity: _____

b. Shipping Weight: _____ kilogr

3. TRANSFORMERS AND REGULATORS:

a. Dimensions: _____

b. Nameplate Gallons: _____ gall

c. PCB Concentration: _____ P

d. Shipping Weight: _____ kilogra

e. To Be Shipped: ☐ Full ☐ Drained Only ☐ Drained and Flushed

4. OTHER TYPES OF PCB ARTICLES (Be specific):

a. Name: _____

b. Quantity: _____ Shipping Container: _____

c. Shipping Weight: _____ kilogra

d. PCB Concentration: _____ P

ROLLINS ENVIRONMENTAL SERVICES SALES OFFICES

CORPORATE OFFICE
Rollins Environmental Services (SALES) Inc.
Mail To: One Rollins Plaza, P.O. Box 2349
Wilmington, DE 19899
(302) 479-2768 · 1-800-X-WASTES Fax (302) 479-3339

NEW JERSEY
Rollins Environmental Services (SALES) Inc.
Mail To: P.O. Box 337
Bridgeport, NJ 08014
Ship To: Rt. 322 & I-295
Bridgeport, NJ 08014
(609) 467-3105 Fax (609) 467-1040

LOUISIANA
Rollins Environmental Services (SALES) Inc.
Mail To: P.O. Box 74137
Baton Rouge, LA 70807
Ship To: 13351 Scenic Highway
Baton Rouge, LA 70807
(504) 778-3535 Fax (504) 778-3553

Rollins Environmental Services of LA, Inc.
Mail To: Rt. 2, Box 1200
Plaquemine, LA 70764
Ship To: West Sorrell Road, Gracie Lane
Plaquemine LA 70764
(504) 659-2434 Fax (504) 659-7870

ILLINOIS
Rollins Environmental Services (SALES) Inc.
Mail To: P.O. Box 726
Bensenville, IL 60106
Ship To: Thorndale Business Park #8
1110 W. Thorndale Avenue
Bensenville, IL 60106
(708) 616-9000 Fax (708) 616-9280

TEXAS
Rollins Environmental Services (SALES) Inc.
Mail To: P.O. Box 609
Deer Park, TX 77536
Ship To: 2027 Battleground Road
Deer Park, TX 77536
(713) 930-2300 Fax (713) 930-2334

CALIFORNIA
Rollins Environmental Services (SALES) Inc.
Mail To/Ship To: 3777 Spinnaker Court
Fremont, CA 94538
(415) 225-1680 Fax (415) 490-8152

Rollins Environmental Services (SALES) Inc.
Mail To/Ship To: 1848 E. 55th Street
Los Angeles, CA 90058
(213) 583-6040 Fax (213) 589-5443

CUSTOMER REVISION: Signature _____ Date _____

AMENDMENT TO THE OPC WASTE DATA SHEET
RADIOLOGICAL ACCEPTANCE CRITERIA AND CERTIFICATION

The Department of Environmental Quality is now requiring radiological screening of all incoming wastes to our incineration facilities in Baton Rouge, Louisiana and Deer Park, Texas. As a result, OPC is implementing screening procedures that, among other things , require documentation and in some cases testing by waste generators. This documentation, in the form of a Radiological Certification is now required for all active waste streams. This certification must be completed prior to scheduling material into OPC.

The DEQ has established a maximum radiological activity acceptance level of 25 microRoentgens per hour for waste disposed of at OPC. Material demonstrating activity levels greater than 25 microRoentgens per hour will not be accepted for disposal at OPC . OPC will investigate the source of radiological activity of any material demonstrating levels of twice background (approximately 10 microRoentgens). Should the waste be determined to be radiologically non-complying as per the waste profile, or exceed the 25 microRoentgens regulatory limit, the waste stream will be rejected. The generator will then be responsible for any analytical, demurrage, and transportation costs associated with the investigation and rejection.

We appreciate your understanding and cooperation in dealing with ever changing regulatory requirements. It is OPC's intention to comply with all state and federal regulation so as to provide safe, efficient disposal of hazardous waste.

I understand and agree that this certification shall be attached to and made a part of the Waste Data Sheet describing the indicated waste; that wastes not meeting the Radiological Acceptance Criteria will be rejected by OPC; and that wastes sent to OPC will be subjected to a radiological survey prior to their acceptance.

KAISER RESOURCES, INC. CAD 003934890 N/A

Customer Name EPA I.D. Number OPC Stream Number

The above waste contains special nuclear material in any quantity? Yes_____ No X

The above waste contains greater than 1/20 of 1 percent, by weight, (0.05%) of any source material? Yes_____ No X

The above waste contains 15 picoCurie/gm or greater activity of Radium-226 or Radium-228? Yes_____ No X

Does the above waste contain any radioisotope in a quantity which would require a license to own, possess, transfer, use or dispose of the radioisotope under the regulations of the U.S. Nuclear Regulatory Commission or applicable State laws or regulations? Yes_____ No X

Has the above waste been generated or stored in a radiation control area? Yes_____ No X

Does the facility generating the above waste manufacture or use any manmade radioisotopes or any radioisotope tracers? Yes_____ No X

Does the waste as containerized exhibit a radioactivity level of 25 microRoentgens/hour or more? Yes_____ No X

If the answer to any of the last three question listed immediately above was "Yes" please indicate on an attached sheet the radioisotopes present in the control area and what type of radiological screening has been conducted on the waste prior to is release from the radiation control area; the radioisotopes manufactured or used; whether the above waste could be potentially contaminated with any of the indicated isotopes and why; and if contaminated, please indicate the radioisotopes responsible for the activity level observed.

Certified by: Rob J Hartman ROB J HARTMAN Director of Enviro Projects

Customer Representative Printed Name Title

RECEIVED NOV 2 2 1993

State of California—Environmental Protection Agency
Form Approved OMB No. 2050-0039 (Expires 9-30-94)
Please print or type. *Form designed for use on elite (12-pitch) typewriter.*

See Instructions on back, page 6.

Department of Toxic Substances Control
Sacramento, California

93145032

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

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: CAD003934890 — Manifest Document No.: 45032
2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address: Kaiser Resources, Inc. #1 Court St. P.O. Box 37, Desert Center CA 92239
4. Generator's Phone: 619 392-4257

A. State Manifest Document Number: 98145032
B. State Generator's ID: HAHQ36007059
C. State Transporter's ID: 314315
D. Transporter's Phone: 310-762-[illegible]
E. State Transporter's ID:
F. Transporter's Phone:

5. Transporter 1 Company Name: Custom Environmental Transport
6. US EPA ID Number: DED980918858
7. Transporter 2 Company Name:
8. US EPA ID Number:

9. Designated Facility Name and Site Address: Rollins OPC, 5756 Alba Street, Los Angeles, CA 90058
10. US EPA ID Number: CAD050806850

G. State Facility's ID: CAD050806850
H. Facility's Phone: 213-585-5063

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste Number
a. Non-RCRA Hazardous Waste Liquid (oil) (4735)	001	TT	2000	G	State 221; EPA/Other non-RCRA
b.					State; EPA/Other
c.					State; EPA/Other
d.					State; EPA/Other

J. Additional Descriptions for Materials Listed Above: OP-16679-71; BOL-6918

K. Handling Codes for Wastes Listed Above: a. 01/14; b.; c.; d.

15. Special Handling Instructions and Additional Information: Avoid contact and wear proper protective gear. In case of emergency/accidental spill contact Chemtrec at 1-800-424-9300.

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of the 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 federal, state and international laws.

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.

Printed/Typed Name: ROB J HARTMAN — Signature: Rob J Hartman — Month 11 Day 05 Year 93

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Steve Erichson — Signature: [signature] — Month 11 Day 05 Year 93

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: — Signature: — Month Day Year

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.
Printed/Typed Name: Ceaser F. Ramirez — Signature: Ceaser F. Ramirez — Month 11 Day 08 Year 93

GENERATOR — TRANSPORTER — FACILITY

DO NOT WRITE BELOW THIS LINE.

11/22/93

Yellow: TSDF SENDS THIS COPY TO GENERATOR WITHIN 30 DAYS.
(Generators who submit hazardous waste for transport out-of-state.

DTSC 8022A (7/92)

State of California—Environmental Protection Agency
Form Approved OMB No. 2050-0039 (Expires 9-30-94)
Please print or type. *Form designed for use on elite (12-pi[illegible]ewriter.*

See Instructions on back of page 6.

Department of Toxic Substances Control
Sacramento, California

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

93145032

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: CAD003934890 — Manifest Document No.: 45032
2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Kaiser Resources, Inc.
#1 Court St. P.O. Box 37, Desert Center CA 92239

4. Generator's Phone 619) 392-4257

A. State Manifest Document Number: 93145032
B. State Generator's ID: HAHQ36007059

5. Transporter 1 Company Name: Custom Environmental Transport
6. US EPA ID Number: DED980918858

C. State Transporter's ID: 31431[illegible]
D. Transporter's Phone: 310-7[illegible]176

7. Transporter 2 Company Name:
8. US EPA ID Number:

E. State Transporter's ID:
F. Transporter's Phone:

9. Designated Facility Name and Site Address
Rollins OPC
5756 Alba Street
Los Angeles, CA 90058

10. US EPA ID Number: CAD050806850

G. State Facility's ID:
H. Facility's Phone: 213-58[illegible]063

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a. Non-RCRA Hazardous Waste Liquid (oil)	001	TT	2000	G
b.				
c.				
d.				

[illegible]

15. Special Handling Instructions and Additional Information
Avoid contact and wear proper protective gear. In case of emergency/accidental spill contact Chemtrec at 1-800-424-9300.

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of the 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 federal, state and international laws.

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.

Printed/Typed Name: ROB J HARTMAN — Signature: Rob J Hartman — Month 11 Day 05 Year 93

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Steve Erichson — Signature: Steve Erichson — Month 11 Day 05 Year 93

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: — Signature: — Month Day Year

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.
Printed/Typed Name: — Signature: — Month Day Year

DO NOT WRITE BELOW THIS LINE.

Blue: GENERATOR SENDS THIS COPY TO DTSC WITHIN 30 DAYS.
To: P.O. Box 400, Sacramento, CA 95812-0400

DTSC 8022A (7/92)
EPA 8700—22

ROLLINS OPC INC.

RECEIVED NOV 2 2 1992

Date:

Dear Customer:

Under conditions of our operating permit, Rollins OPC Inc. is required to inform you that we have all the appropriate permits required to manage your waste stream number OP-16679.

Thank you for allowing us to fill your waste management needs.

William Mitzel
President

5756 Alba Street • Los Angeles, CA 90058 • (213) 585-5063 • FAX (213) 585-9214

ROLLINS ORC INC.
5756 Alba Street • Los Angeles, California 90058

STATE OF CALIFORNIA—ENVIRONMENTAL PROTECTION AGENCY

PETE WILSON, Governor

DEPARTMENT OF TOXIC SUBSTANCES CONTROL
400 P Street, 4th Floor
P.O. Box 806
Sacramento, CA 95812-0806
(916) 324-2438

Custom Environmental Transport (CET) Inc.
One Rollins Plaza
Wilmington, Delaware 19803

Serial # V93HQSEB141

Gentlemen:

This letter is in reply to your request of October 26, 1993 for an extension of the certificates of compliance for the vehicles you use under your Hazardous Waste Transporter's Registration No: 0698, Expiration Date October 31, 1994.

Pursuant to Section 66263.14, Division 4.5, Title 22, California Code of Regulations, all vehicles used to transport hazardous wastes must bear a current certificate of compliance issued by the Department of Toxic Substances Control (DTSC). Due to the circumstances that occurred during the renewal of your hazardous waste transporter's registration, DTSC is granting you a one-time extension of the certificates of compliance issued to your vehicles until November 30, 1993 or until your vehicles are all inspected and certified, whichever comes first.

This extension applies only to the vehicles certified during 1992. It does not apply to any other vehicles in your possession. The conditions of this extension are as follows:

1. Contact your local California Highway Patrol (CHP) Motor Carrier Safety Unit, to schedule the inspections for the vehicles which have not been certified for the current year.

2. The vehicles which have not been inspected may be used to transport hazardous waste under this extention until they can be scheduled for inspection by the CHP, Motor Carrier Safety Unit.

3. A copy of this extension, along with a copy of your current registration certificate and a properly completed manifest must be carried in each vehicle which carries hazardous waste which has not been certified for the current year.

This extension does not relieve the grantee from compliance with any other applicable sections of the Health and Safety Code or regulations adopted thereunder.

STATE OF CALIFORNIA—ENVIRONMENTAL PROTECTION AGENCY

PETE WILSON, Governor

DEPARTMENT OF TOXIC SUBSTANCES CONTROL
400 P Street, 4th Floor
P.O. Box 806
Sacramento, CA 95812-0806

(916) 323-3219

HAZARDOUS WASTE TRANSPORTER REGISTRATION
RESTRICTED REGISTRATION

NAME AND ADDRESS OF REGISTERED TRANSPORTER:

Custom Environmental Transport, Inc.
One Rollins Plaza
Wilmington, Delaware 19803

TRANSPORTER REGISTRATION NUMBER: 0698

EXPIRATION DATE: October 31, 1994

This is to certify that the firm named above is duly registered to transport hazardous waste in the State of California in accordance with the provisions of Chapter 6.5, Division 20 of the California Health and Safety Code (H&SC) and Chapter 13, Division 4.5 of Title 22 of the California Code of Regulations.

Please note that this registration is restricted, requiring the inspection and certification of your vehicles/containers on their first trip entering California, and must be carried with the vehicles/containers used to transport hazardous waste. This restricted registration also meets the requirements of California Vehicle Code, section 34100 for the transportation of flammable or combustible liquids in a tank of proper Department of Transportation (DOT) specification, provided that a certification inspection appointment has been made with the California Highway Patrol (CHP).

To arrange for this inspection and certification, you must contact the Hazardous Materials Section, California Highway Patrol, P.O. Box 942898, Sacramento, California 94298-0001, telephone (916) 327-3310, to set up an inspection date. This must be completed at least three State working days before the vehicle(s)/container(s) are to enter the State. "State working days" do not include weekends or State holidays.

When transport vehicles laden with hazardous waste or flammable/combustible liquids enter the State of California, the driver must be prepared to provide the following information to any authorized person upon request:

1. This Hazardous Waste Transporter Restricted Registration, and
2. The telephone number of the California Highway Patrol, Motor Carrier Safety Unit that will be inspecting your vehicle and/or container, and
3. The date, time and location of your scheduled inspection appointment.

NOTE: This provision is only to allow a laden vehicle or container to enter the State and be presented for inspection. It is illegal to load and transport hazardous waste or flammable/combustible liquids in vehicles/ containers in California prior to inspection and certification.

(AUTHORIZED SIGNATURE)

OCT 27 1993

(DATE)

cc: CHP Hazardous Materials Section

If you have any questions regarding this extension, you may call the Transportation Unit at (916) 324-2430.

Sincerely,

Lloyd A. Batham III, Chief
Transportation Unit
Surveillance and Enforcement Branch

cc: Surveillance and Enforcement Branch
Department of Toxic Substances Control
1515 Toll House Road
Clovis, California 93612

Ms. Patti Barni, Acting Chief
Surveillance and Enforcement Branch
Department of Toxic Substances Control
700 Heinz Avenue, Bldg. F., Second Floor
Berkeley, California 94710

Mr. Scott Simpson, Chief
Surveillance and Enforcement Branch
Department of Toxic Substances Control
1011 Grandview Avenue
Glendale, California 91201

Ms. Paula Rasmussen, Chief
Surveillance and Enforcement Branch
Department of Toxic Substances Control
245 West Broadway, Suite 360
Long Beach, California 90802

California Highway Patrol
Motor Carrier Safety Unit
P.O. Box ~~942898-0001~~ 94298
Sacramento, California 94298-0001

Ms. Mary Locke, Chief
Office of Criminal Investigation
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

Mr. James Cutright, Acting Chief
Office of Legal Counsel
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF SOLID AND HAZARDOUS WASTE MANAGEMENT
P.O. Box 7035
Indianapolis, IN 46207-7035

RECEIVED DEC 15 1993

PLEASE PRINT OR TYPE (Form designed for use on elite (12-pitch typewriter.) Form Approved. OMB No. 2050-0039. Expires 9-30-94

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA No.: C.A.D.0.0.3.7.3.4.0.9 Manifest Document No.: 0.5.5.8.1.1
2. Page 1 of
Information in the shaded areas is not required by Federal law, but items D, F, H, I and K are required by State law.

3. Generator's Name and Mailing Address: Kaiser Resources Inc. #1 Court Street / P.O. Box 37 Desert Center CA 92239
4. Generator's Phone (619) 392 4257

A. State Manifest Document Number: INA 0855811
B. State Generator's ID: HAHQ36007059

5. Transporter 1 Company Name: CHEMICAL DISPOSAL
6. US EPA ID Number: A.Z.T.0.5.0.0.1.0.0.0.8
C. State Transporter's ID: 0586
D. Transporter's Phone: 602-624-2348

7. Transporter 2 Company Name:
8. US EPA ID Number:
E. State Transporter's ID:
F. Transporter's Phone:

9. Designated Facility Name and Site Address: Pollution Control Industries, 4343 Kennedy Avenue, East Chicago Indiana 46312
10. US EPA ID Number: IND.0.0.0.6.4.6.9.4.3
G. State Facility's ID:
H. Facility's Phone: (800) 388 7242

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Total Wt/Vol.	I. Waste No.
a Potassium Hydroxide solution, Class 8, Packing Group 2, U.N. 1814	005	DM	91.0	Kg	D002
b					
c					
d					

J. Additional Descriptions for Materials Listed Above: C: 501811 B: 501683 WSTR: 113511 S25428
K. Handling Codes for Wastes Listed Above: S01

15. Special Handling Instructions and Additional Information: Avoid contact and wear proper protective gear. In case of emergency/accidental spill contact Chemical Disposal at 602 624 2348 12/6/93 1,072#

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 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.

Printed/Typed Name: ROB J HARTMAN
Signature: Rob J Hartman
Date: Month 1 Day 1 Year 93

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: ARTHUR MAXWELL
Signature: Arthur Maxwell
Date: Month 1 Day 5 Year 93

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted Item 19.
Printed/Typed Name: Maja Stockstill
Signature: Maja Stockstill
Date: Month 1 Day 6 Year 93

GENERATOR / TRANSPORTER / FACILITY

In case of a spill call the Indiana Office of Environmental Response at 317/241-4336 (day or night) and the National Response Center at 800/424-8802 or 202/426-2675.

INA0855811

EPA Form 8700-22
Previous editions are obsolete
State Form 11865 (R/4-89)

cc. R. Hartman

COPY 4 TSD MAIL TO GENERATOR

OFFICE OF SOLID AND HAZARDOUS WASTE MANAGEMENT
P.O. Box 7035
Indianapolis, IN 46207-7035

PLEASE PRINT OR TYPE *(Form designed for use on elite (12-pitch typewriter.)* *Form Approved. OMB No. 2050-0039. Expires 9-30-94*

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA No.: C.A.D.0039.3409055811 — Manifest Document No.:
2. Page 1 of — Information in the shaded areas is not required by Federal law, but items D, F, H, I and K are required by State law.

3. Generator's Name and Mailing Address: Kaiser Resources Inc. #1 Court Street / P.O. Box 37 Desert Center, CA 92239
4. Generator's Phone: (619) 392 4257
A. State Manifest Document Number: INA 0855811
B. State Generator's ID: HAHQ36007059
5. Transporter 1 Company Name: CHEMICAL DISPOSAL
6. US EPA ID Number: A.Z.T.0.5.0.0.1.0.0.0.8
C. State Transporter's ID: 0586
D. Transporter's Phone: 602-624-2348
7. Transporter 2 Company Name:
8. US EPA ID Number:
E. State Transporter's ID:
F. Transporter's Phone:
9. Designated Facility Name and Site Address: Pollution Control Industries, 4343 Kennedy Avenue, East Chicago Indiana 46312
10. US EPA ID Number: IND.000646943
G. State Facility's ID:
H. Facility's Phone: (800) 388 7242

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Total Wt/Vol.	I. Waste No.
a Potassium Hydroxide solution, Class 8, Packing Group 2, U.N. 1814	005	DM	910	Kg	D002
b					
c					
d					

J. Additional Descriptions for Materials Listed Above:
K. Handling Codes for Wastes Listed Above:

15. Special Handling Instructions and Additional Information: Avoid contact and wear proper protective gear. In case of emergency/accidental spill, contact Chemical Disposat at 602 624 2348

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 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.

Printed/Typed Name: ROB J HARTMAN — Signature: Rob J Hartman — Month: 1 Day: 1 Year: 93

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: ARTHUR MAXWELL — Signature: Arthur Maxwell — Month: 1 Day: 1 Year: 93

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: — Signature: — Month: Day: Year:

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted item 19.
Printed/Typed Name: — Signature: — Month: Day: Year:

GENERATOR — TRANSPORTER — FACILITY

In case of a spill call the Indiana Office of Environmental Response at 317/241-4336 (day or night) and the National Response Center at 800/424-8802 or 202/426-2675.

INA0855811

EPA Form 8700-22
Previous editions are obsolete
State Form 11865 (R/4-89)

COPY 2. GENERATOR MAIL TO GENERATOR STATE

NOTIFICATION OF HAZARDOUS WASTE RESTRICTED FROM LAND DISPOSAL

This form must be completed by the generator and should accompany each shipment of waste subject to land ban restrictions (40 CFR 268). Use a separate form for each line (11a, 11b, 11c, 11d) on your manifest. Check the appropriate category(ies) on the table(s) from Sections I, II, and III below and be sure to sign at the bottom.

Generator Name: Kaiser Resources Inc. EPA I.D. #: CAD0039340901

Manifest Doc No.: INA 0855811 Waste Profile No.: 11111111

Date of Shipment: 11-15-93 EPA Waste Code D002

MANIFEST LINE #: (X)11a ( )11b ( )11c ( )11d

I. The wastes identified on the above-mentioned manifest number and bearing the EPA Hazardous Waste Number(s) identified above are subject to the land disposal restrictions of 40 CFR Part 268. The wastes do not meet the treatment standards specified in 40 CFR 268 Subpart D or the prohibitions specified in 40 CFR 268.32 or RCRA Section 3004 (d). In compliance with the notification requirements of 40 CFR 268, we are indicating below the applicable subcategory, Treatability Group and Treatment Standard Reference or Five Section Code for how the waste must be treated.

F001 to F005 Solvent Wastes

Hazardous Waste Description	Constituents of Concern	Non-Wastewater Total Composition, mg/kg CCW[1]	TCLP, mg/L CCWE[2]		Wastewater, Total Composition, mg/L CCW[1]	TCLP, mg/L CCWE[2]	
F001 - Spent halogenated solvents used in degreasing	Carbon tetrachloride		0.86	___		0.05	___
	Methylene chloride		0.86	___		0.20	___
	Tetrachloroethylene		0.05	___		0.078	___
	1,1,1-trichloroethane		0.41	___		1.05	___
	Trichloroethylene		0.081	___		0.062	___
	1,1,2-Trichloro-1,2,2-trifluoroethane		0.86	___		1.05	___
	Trichlorofluoromethane		0.86	___		0.05	___
F002-Spent halogenated solvents	Chlorobenzene		0.05	___		0.15	___
	1,2-Dichlorobenzene		0.125	___		.85	___
	Methylene chloride		0.86	___		0.20	___
	Methylene chloride (from the pharmaceutical industry)			___	.44		___
	Tetrachloroethylene		0.05	___		0.078	___
	1,1,1-Trichloroethane		0.41	___		1.05	___
	1,1,2-Trichloroethane	7.6			0.036		
	Trichloroethylene		.081	___		0.062	___
	1,1,2-Trichloro-1,2,2-trifluoroethane		0.86	___		1.05	___
	Trichlorofluoromethane		0.86	___		0.05	___
F003-Spent nonhalogenated solvents	Acetone		0.59	___		0.05	___
	n-Butyl alcohol		5.0	___		5.0	___
	Cyclohexanone		0.75	___		0.125	___
	Ethyl acetate		0.75	___		0.05	___
	Ethyl benzene		0.053	___		0.05	___
	Ethyl ether		0.75	___		0.05	___
	Methanol		0.75	___		0.25	___
	Methyl isobutyl ketone		0.33	___		0.05	___
	Xylene		0.15	___		0.05	___
F004-Spent nonhalogenated solvents	Cresols (and cresylic acid)		0.750	___		2.82	___
	Nitrobenzene		0.125	___		0.66	___
F005-Spent nonhalogenated solvents	Benzene	3.7		___	0.070		___
	Carbon disulfide		4.81	___		1.05	___
	2-Ethoxyethanol	Incineration			Biological degradation or incineration		
	Isobutanol		5.0			5.0	
	Methyl ethyl ketone		0.75	___		0.05	___
	2-Nitropropane	Incineration			(Wet oxidation or chemical oxidation) followed by carbon adsorption or incineration		
	Pyridine		0.33			1.12	
	Toluene		0.33	___		1.12	___

II. California List Wastes

( ) PCBs >50 ppm (incineration).
( ) Liquid hazardous wastes that contain halogenated organic compounds (HOC's) in total concentration > or = to 1,000 mg/l liquids or 1,000 mg/kg (nonliquids). (INCINERATION) (HOC's found in 268.32 Appendix III, see attached).
( ) Nickel (liquid waste) >134 ppm.
( ) Thallium (liquid waste) >130 ppm.

III. Additional Hazardous Characteristics

( ) No additional Hazardous Characteristics are exhibited by this waste which would require treatment beyond the standards described above.
( ) Treatment Standards for the additional Hazardous Characteristics requiring treatment are indicated below.

Table A: TREATMENT STANDARDS FOR ADDITIONAL HAZARDOUS WASTE CHARACTERISTIC TREATMENT STANDARDS (40 CFR 268)
Check any applicable subcategories.

	Hazardous Waste Subcategories	Constituents of Concern	NONWASTEWATER Total Composition mg/kg	NONWASTEWATER TCLP mg/L	WASTEWATER Total Composition mg/L
__	D001 - Ignitable liquids High - TOC nonwastewater (>10% TOC)		INCIN, FSUBS, RORGS		N.A.
__	D001 - Ignitable liquids (Low TOC nonwastewater 1% TOC <10%)		DEACT.		N.A.
__	D001 - Ignitable liquids wastewater (<1% TOC <1% TSS)		N.A.		DEACT
__	D001 - Ignitable compressed gases		DEACT		N.A.
__	D001 - Ignitable reactives		DEACT		N.A.
__	D001 - Oxidizers		DEACT		DEACT
__	D002 - Acidic corrosives		DEACT		DEACT
X	D002 - Alkaline corrosives		DEACT		DEACT
__	D002 - Other corrosives		DEACT		DEACT
__	D004 - Arsenic	Arsenic		5	5
__	D005 - Barium	Barium		100	100
__	D006 - Cadmium	Cadmium		1	1
__	D007 - Chromium	Chromium (total)		5	5
__	D008 - Lead	Lead		5	5
__	D009 - Low mercury (< 260mg/kg total Hg)	Mercury		0.2	0.2
__	D009 - High mercury (> or = 260 mg/kg total Hg)	Mercury w/organics Mercury w/inorganics	IMERC, RMERC RMERC		
__	D010 - Selenium	Selenium		5.7	1
__	D011 - Silver	Silver		5	5
__	D012 - Endrin	Endrin	0.13		INCIN, BIODG
__	D013 - Lindane	Lindane	0.066		INCIN, CARBN
__	D014 - Methoxychlor	Methoxychlor	0.18		INCIN, WETOX
__	D015 - Toxaphene	Toxaphene	1.3		INCIN, BIODG
__	D016 - 2,4-D	2,4-D	10		INCIN, CHOXD, BIODG
__	D017 - 2,4,5-Silvex	2,4,5-TP	7.8		INCIN, CHOXD

Abbreviations of technology codes from 40 CFR 268.42:

INCIN (Incineration)
FSUBS (Fuel substitution)
RORGS (Recovery of organics)
IMERC (Roasting/retorting of organics)
RMERC (Incineration followed by roasting/retorting of ash)
WETOX (Wet air oxidation)
DEACT (Deactivation to remove the characteristic)
RTERM (Thermal recovery)
RLEAD (Thermal recovery of lead in secondary smelters)
AMLGM (Amalgamation)
BIODG (Biodegradation)
CARBN (Carbon adsorption)
CHOXD (Chemical Oxidation)

Table B: 1. List all U.S. EPA hazardous waste codes requiring treatment beyond the standards described in Sections I, II, and Table A. For each waste code: 2. Identify the appropriate line # from the manifest Section II; 3. List the corresponding subcategory, check none if there is no subcategory; 4. Complete the treatment standards section by placing a checkmark in the appropriate performance-based column or write the appropriate code in the specific technology column (listed above); and 5. Place a checkmark in the column that applies to this waste.

1. U.S. EPA Hazardous Waste Code (s)	2. Manifest Line # Section II	3. Subcategory Description	None	4. Applicable Treatment Performance Based 268.41(a) CCWE[2]	268.43 CCW[1]	Specified Technology 268.42	5. Waste Manage Method (enter number from below) Wastewater	Nonwastewater

[1]CCW - Constituent concentrations in wastes. [2]CCWE - Constituent concentrations in waste extract.

Certification

I hereby certify that all information submitted in this and all associated documents is complete and accurate to the best of my knowledge and information.

Company Name Kaiser Resources, Inc.

Authorized Signature Rol J Hartman Date 11-15-93

Revised 11/08/90

224804

Reorder from CURTIS 1000, ROLLING MEADOWS, IL (708) 259-8600

Part 1 - Facility Copy
Part 2 - Environmental Dept.
Part 3 - Office Copy
Part 4 - Generator Copy

Pollution Control Industries
Corporate:
3317 Chicago Road, South Chicago Heights, IL 60411
Telephone: (708) 597-9500 FAX: (708) 754-7935
(800) 388-7242

FACILITY COPY

MATERIAL DATA SURVEY

PROFILE # 113511

Generator Name: KAISER STEEL RESOURCES
Billing Name: CEMTECH-LP
Street: 41 COURT STREET / P.O. BOX 37
Street: 123 E. 9th St., Suite 104
City: DESERT CENTER State: CA Zip: 92239
City: Upland, CA 91786 State: Zip:
Technical Contact: ROB HARTMAN Title: DIRECTOR Phone: 909/944-4163 Fax: 909/944-4158
Federal EPA ID No.: CAD003934890 State ID No.: HAHQ3600 7059 S.I.C. Code: Form Code B:
☐ Check if you are a Conditionally Exempt Small Quantity Generator ☒ Check if you are a Broker PCI Sales Rep. S. HANSON
Common Name of Waste: POTASSIUM HYDROXIDE SOLUTION
Original Process Generating Waste (must be specific): Unusable product (off-spec)

Method of Shipment ☒ Drum (SIZE) ☐ Bulk Quantity 5 per ☐ Wk ☐ Mo ☐ Qtr ☐ Yr ☒ One-time
☐ MSDS Attached? ☐ Yes ☒ No TCLP Attached? ☐ Yes ☒ No ☐ Check if sample has been submitted

PHYSICAL PROPERTIES @ 25 C (77 F)

Color(s): WHITE/CLEAR % Total Halogens: N/A Specific Gravity: ~1.4
Odor (via casual detection) ☐ None ☒ Mild ☐ Strong

Physical State		Phase/Layers	Btu/Lb.	pH	Flashpoint
20 % Liquid	0 % Sludge	☐ Single	☐ < 5,000	☐ < 2.0	☐ < 100°
80 % Solid	0 % Powder	☒ Multiple, how many 2	☐ 5-10,000	☐ 2.0-12.5	☐ 100-140°
			☐ > 10,000	☐ > 12.5	☐ 140-200°
			Exact	Exact	☐ > 200°

D. Based on knowledge or analysis, provide TCLP and TOTAL metals for all wastes (provide an actual value or range).

INORGANIC CHARACTERISTICS

D004	Arsenic	5.0	
D005	Barium	100.0	
D006	Cadmium	1.0	
D007	Chromium	5.0	
D008	Lead	5.0	
D009	Mercury	0.2	

State of California Environmental Protection Agency
Form Approved OMB No. 2050-0039 (Expires 9-30-94)
Please print or type. Form designed for use on elite (12 ... typewriter.

See instructions on back page 6.

Department of Toxic Substances Control
Sacramento, California

92058275

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

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: CAD003934890 — Manifest Document No.: ~~9 3 0 0 1 1~~
2. Page 1 of 2

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
KAISER RESOURCES, INC.
8300 UTICA AVE. STE#301, RANCHO CUCAMONGA, CA, ~~77751~~ 91730

4. Generator's Phone (909) 944-4163 ROB HARTMAN

5. Transporter 1 Company Name: CUSTOM ENVIRONMENTAL TRANSPORT
6. US EPA ID Number: DED980918858

7. Transporter 2 Company Name:
8. US EPA ID Number:

9. Designated Facility Name and Site Address
5756 ALBA ST.
LOS ANGELES, CA 90058
10. US EPA ID Number: CAD050806856

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
Hazardous Waste Solid NOS 9 UN3077 RQ (Lead Vessel [illegible]) 4390	002	DM	00400	P
Hazardous Waste Solid NOS 9 UN3077 RQ (Lead) 4391	001	DF	00400	P
Residue [illegible] contained Hazardous Waste Solid NOS 9 UN3077 RQ 4392	007	DM	00225	P
Hazardous Waste Solid NOS 9 UN3077 RQ (Lead [illegible]) 4393	005	DF	00660	P

[redacted]

15. Special Handling Instructions and Additional Information
IN CASE OF ACCIDENT OR SPILL CALL CHEMTREC AT 1-800-424-9300 AND MENTION "LABPACKS". AVOID CONTACT. DO NOT BREATHE VAPORS. DO NOT [illegible] SEWER OR WATERWAY. IF UNDELIVERABLE, RETURN TO GENERATOR.
DOT ERG#: 11A(3) 11B(3) 11C(3) 11D(3)

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of the 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 federal, state and international [illegible]

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.

Printed/Typed Name	Signature	Month Day Year
X [illegible]	X [illegible]	[illegible]

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month Day Year
[illegible]	[illegible]	10 08 [illegible]

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month Day Year

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.

Printed/Typed Name	Signature	Month Day Year
Ceaser F. Ramirez	Ceaser F. Ramirez	10 12 79

DO NOT WRITE BELOW THIS LINE.

Yellow: TSDF SENDS THIS COPY TO GENERATOR WITHIN 30 DAYS. (Generators who submit hazardous waste for transport out of state, to produce completed copy of this copy and send to DTSC within 30 days.)

DTSC 8022A (12/91)
EPA 8700-22

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039, Expires 8-30-91

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)

21. Generator's US EPA ID No.: CAD003934890 Manifest Document No.: 93001

22. Page: 2

Information in the shaded areas is not required by Federal law.

23. Generator's Name
Kaiser Resources
8300 Utica Ave. Ste #301 91730
Rancho Cucamonga CA 92239 CA

24. Transporter ____ Company Name 25. US EPA ID Number

26. Transporter ____ Company Name 27. US EPA ID Number

28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	29. Containers No.	Type	30. Total Quantity	31. Unit Wt/Vol
a. Hazardous Waste Liquid, n.os, 9, UN3082 PG III (Soapy water w/ lead) 4393	001	DF	00050	P
b. Waste Flammable Liquids, n.os, 3, UN1993 PG II (Petroleum Distillates 4393	002	DF	180	P
c. Waste Flammable Liquids, n.os, 3, UN1993 PG II (Petroleum Distillates) 4393	001	DM	001,50	P
d.				
e.				
f.				
g.				
h.				
i.				

28b)
28c)

32. Special Handling Instructions and Additional Information

See box 15, page 1
DOT ERGH: 28a)3 28b)27 28c)27

TRANSPORTER

33. Transporter ____ Acknowledgement of Receipt of Materials — Date: Month Day Year
Printed/Typed Name — Signature

34. Transporter ____ Acknowledgement of Receipt of Materials — Date: Month Day Year
Printed/Typed Name — Signature

FACILITY

35. Discrepancy Indication Space

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete. Recorder No. 800 Lab Safety Supply

State of California—Environmental Protection Agency
Form Approved OMB No. 2050-0039 (Expires 9-30-94)
Please print or type. Form designed for use on elite (12-pitch) typewriter.

See Instructions on back of page 6.

Department of Toxic Substances Control
Sacramento, California

92058275

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

GENERATOR

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: CAD003934890 ~~930011~~ 93001
Manifest Document No.
2. Page 1 of 2
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
KAISER RESOURCES, INC.
8300 UTICA AVE. STE#301, RANCHO CUCAMONGA, CA ~~92239~~ 91730
4. Generator's Phone (909) 944-4163 ROB HARTMAN

A. State Manifest Document Number: [redacted]
B. State Generator's ID: [redacted]

5. Transporter 1 Company Name: CUSTOM ENVIRONMENTAL TRANSPORT
6. US EPA ID Number: DED980918858
C. State Transporter's ID: [redacted]
D. Transporter's Phone: [redacted]

7. Transporter 2 Company Name:
8. US EPA ID Number:
E. State Transporter's ID: [redacted]
F. Transporter's Phone: [redacted]

9. Designated Facility Name and Site Address
5756 ALBA ST.
LOS ANGELES, CA 90058
10. US EPA ID Number: CAD050806850
G. State Facility's ID: [redacted]
H. Facility's Phone: (213) 585-1871

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste Number
a. Hazardous Waste Solid, n os, 9, UN3077, PG III (Grease) (Vanishing Oil Dust)	023	DM	08900	P	State 352-[illegible] EPA/Other D008
b. Hazardous Waste Solid, n os, 9, UN3077, PG III (Grease)	009	DF	00900	P	State 352 EPA/Other D008
c. Residue: Last contained Hazardous Waste Solid, n os, 9, UN3077, PG III	007	DM	00225	P	State [illegible] EPA/Other NR
d. Hazardous Waste Solid, n os, 9, UN3077 PG III (Dried Paint Debris)	008	DF	00660	P	State [illegible] EPA/Other D008

J. Additional Descriptions for Materials Listed Above
11a) Bulks OP 16385-30
11b) [illegible]
11c) Bulks OP 16385-46
11d) Labpacks OP 16385-02

K. Handling Codes for Wastes Listed Above
a. b. c. d.

15. Special Handling Instructions and Additional Information
IN CASE OF ACCIDENT OR SPILL CALL CHEMTREC AT 1-800-424-9300 AND MENTION "LABPACKS". AVOID CONTACT. DO NOT BREATHE VAPORS. DO NOT WASH INTO SEWER OR WATERWAY. IF UNDELIVERABLE, RETURN TO GENERATOR.
DOT ERG#: 11A) 31 11B) 31 11C) 31 11D) 31

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of the 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 federal, state and international laws.

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.

Printed/Typed Name	Signature	Month	Day	Year
X Jeannette Roberts	X [signature]	X 10	08	93

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
Charles Hudak	[signature]	10	08	93

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

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.

Printed/Typed Name	Signature	Month	Day	Year

DO NOT WRITE BELOW THIS LINE.

Blue: GENERATOR SENDS THIS COPY TO DTSC WITHIN 30 DAYS.
To: P.O. Box 400, Sacramento, CA 95812-0400

DTSC 8022A (12/91)

State of California—Environmental Protection Agency
Form Approved OMB No. 2050-0039 (Expires 9-30-94)
Please print or type. Form designed for use on elite (12-pitc writer.

See Instructions on back of page 6.

Department of Toxic Substances Control
Sacramento, California

92058275

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

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: C A D 0 0 3 9 3 4 8 9 0
Manifest Document: 9 3 0 0 1 1
2. Page 1 of 2
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
KAISER RESOURCES, INC.
8300 UTICA AVE. STE#301, RANCHO CUCAMONGA, CA ~~92737~~ 91730

4. Generator's Phone (909) 944-4163 ROB HARTMAN

5. Transporter 1 Company Name: CUSTOM ENVIRONMENTAL TRANSPORT
6. US EPA ID Number: D E D 9 8 0 9 1 8 8 5 8

7. Transporter 2 Company Name:
8. US EPA ID Number:

9. Designated Facility Name and Site Address
5756 ALBA ST.
LOS ANGELES, CA 90050
10. US EPA ID Number: C A D 0 5 0 8 0 6 8 5 0

H. Facility's Phone: (213) 585-1872

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	Waste Number
a. [illegible]	[illegible]	DM	[illegible]	P	State [illegible] EPA/Other [illegible]
b. [illegible]	[illegible]	DF	[illegible]	P	State [illegible] EPA/Other [illegible]
c. [illegible]	[illegible]	DM	[illegible]	P	State [illegible] EPA/Other [illegible]
d. [illegible]	[illegible]	DF	[illegible]	P	State [illegible] EPA/Other [illegible]

J. Additional Descriptions for Materials Listed Above
[illegible]

K. Handling Codes for Wastes Listed Above
[illegible]

15. Special Handling Instructions and Additional Information
IN CASE OF ACCIDENT OR SPILL CALL CHEMTREC AT 1-800-424-9300 AND MENTION "LABPACKS". AVOID CONTACT. DO NOT BREATHE VAPORS. DO NOT WASH INTO SEWER OR WATERWAY. IF UNDELIVERABLE, RETURN TO GENERATOR.
DOT ERG#: [illegible]

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of the 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 federal, state and international laws.

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.

Printed/Typed Name	Signature	Month	Day	Year
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
Charles Hodak	[illegible]	10	08	[illegible]

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

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.

Printed/Typed Name	Signature	Month	Day	Year

DO NOT WRITE BELOW THIS LINE.

DTSC 8022A (12/91)
EPA 8700—22

Yellow: GENERATOR RETAINS

Please print or type. (Form designed for use on 12-pitch) typewriter.) Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST
(Continuation Sheet)

21. Generator's US EPA ID No.

Manifest Document No.

22. Page 2

Information in the shaded areas is not required by Federal law.

23. Generator's Name

L. State Manifest Document Number

M. State Generator's ID

24. Transporter _____ Company Name

25. US EPA ID Number

N. State Transporter's ID

O. Transporter's Phone

26. Transporter _____ Company Name

27. US EPA ID Number

P. State Transporter's ID

Q. Transporter's Phone

28. US DOT Description *(Including Proper Shipping Name, Hazard Class, and ID Number)*	29. Containers No.	Type	30. Total Quantity	31. Unit Wt/Vol	R. Waste No.
a.					
b.					
c.					
d.					
e.					
f.					
g.					
h.					
i.					

S. Additional Descriptions for Materials Listed Above

T. Handling Codes for Wastes Listed Above

32. Special Handling Instructions and Additional Information

TRANSPORTER

33. Transporter _____ Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date: Month Day Year

34. Transporter _____ Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date: Month Day Year

FACILITY

35. Discrepancy Indication Space

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST
(Continuation Sheet)

21. Generator's US EPA ID No.

Manifest Document

22. Page

Information in the shaded areas is not required by Federal law.

23. Generator's Name

L. State Manifest Document Number

M. State Generator's ID

24. Transporter _____ Company Name

25. US EPA ID Number

N. State Transporter's ID

O. Transporter's Phone

26. Transporter _____ Company Name

27. US EPA ID Number

P. State Transporter's ID

Q. Transporter's Phone

28. US DOT Description *(Including Proper Shipping Name, Hazard Class, and ID Number)*	29. Containers No.	Type	30. Total Quantity	31. Unit Wt/Vol	R. Waste No.
a.					
b.					
c.					
d.					
e.					
f.					
g.					
h.					
i.					

S. Additional Descriptions for Materials Listed Above

T. Handling Codes for Wastes Listed Above

32. Special Handling Instructions and Additional Information

TRANSPORTER

33. Transporter _____ Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date: Month Day Year

34. Transporter _____ Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date: Month Day Year

FACILITY

35. Discrepancy Indication Space

State of California—Environmental Protection Agency
Form Approved OMB No. 2050-0039 (Expires 9-30-94)
Please print or type. Form designed for use on elite (12-pitc writer.

See Instructions on back of page 6.

Department of Toxic Substances Control
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. CAD003934890 ~~93001~~ Manifest Document 93001

2. Page 1 of 2

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
KAISER RESOURCES, INC.
8300 UTICA AVE. STE#301, RANCHO CUCAMONGA, CA ~~92239~~ 91730

4. Generator's Phone (909) 944-4163 ROB HARTMAN

A. State Manifest Document Number 92058275

B. State Generator's ID

5. Transporter 1 Company Name CUSTOM ENVIRONMENTAL TRANSPORT

6. US EPA ID Number DED980918858

C. State Transporter's ID 318092

D. Transporter's Phone ~~213-562-1881~~

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address ROLLINS OPC
5756 ALBA ST.
LOS ANGELES, CA 90058

10. US EPA ID Number CAD050806850

G. State Facility's ID

H. Facility's Phone (213) 585-1871

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste Number
a. Hazardous Waste Solid, n-os, 9, UN3077, PG III (Grease) (Contaminated Oily Dirt)	023	DM	08900	P	State 352/223 EPA/Other D008
b. Hazardous Waste Solid, n-os, 9, UN3077, PG III (Grease)	009	DF	00900	P	State 352 EPA/Other D008
c. Residue: Last contained Hazardous Waste Solid, n-os, 9, UN3077, PG III	007	DM	00225	P	State 572 EPA/Other NR
d. Hazardous Waste Solid, n-os, 9, UN3077 PG III (Dried Paint, Debris)	008	DF	00660	P	State 352/551 EPA/Other D008

J. Additional Descriptions for Materials Listed Above
11a) Bulks OP-16385-30
11b) Labpacks
11c) Bulks OP-16385-46
11d) Labpacks OP-16385-02

K. Handling Codes for Wastes Listed Above
a. b.
c. d.

15. Special Handling Instructions and Additional Information
IN CASE OF ACCIDENT OR SPILL CALL CHEMTREC AT 1-800-424-9300 AND MENTION "LABPACKS". AVOID CONTACT. DO NOT BREATHE VAPORS. DO NOT WASH INTO SEWER OR WATERWAY. IF UNDELIVERABLE, RETURN TO GENERATOR.
DOT ERG#: 11A) 3 | 11B) 3 | 11C) 3 | 11D) 3 |

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of the 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 federal, state and international laws.

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.

Printed/Typed Name	Signature	Month	Day	Year
X Jeannette Roberts	X J Roberts	X 10	08	9

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
Charles Hudak	[signature]	10	08	9

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

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.

Printed/Typed Name	Signature	Month	Day	Year

DO NOT WRITE BELOW THIS LINE.

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

92058275

DTSC 8022A (12/91)
EPA 8700—22

White: TSDF SENDS THIS COPY TO DTSC WITHIN 30 DAYS.
To: P.O. Box 3000, Sacramento, CA 95812

Please print or type. (Form designed for use r 'e (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)

21. Generator's US EPA ID No.: CAD003934890 | Manifest Document: 93001

22. Page: 2

Information in the shaded areas is not required by Federal law.

23. Generator's Name: Kaiser Resources, 8300 Utica Ave. Ste#301 91730, Rancho Cucamonga CA 92239 CA

L. State Manifest Document Number: CA 92058275

M. State Generator's ID:

24. Transporter ____ Company Name

25. US EPA ID Number

N. State Transporter's ID

O. Transporter's Phone

26. Transporter ____ Company Name

27. US EPA ID Number

P. State Transporter's ID

Q. Transporter's Phone

28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	29. Containers No.	Type	30. Total Quantity	31. Unit Wt/Vol	R. Waste No.
a. Hazardous Waste Liquid, n-os, 9, UN3082 PG III (Soapy water w/lead)	001	DF	00050	P	134 D008
b. Waste Flammable Liquids, n-os, 3, UN1993 PG II (Petroleum Distillates	002	DF	80	P	551 D001
c. Waste Flammable Liquids, n-os, 3, UN1993 PG II (Petroleum Distillates)	001	DM	00150	P	551 D001
d.					
e.					
f.					
g.					
h.					
i.					

S. Additional Descriptions for Materials Listed Above

28a) Labpack OP-16385-02
28b) ↓ ↓
28c) ↓ OP-16385-01

T. Handling Codes for Wastes Listed Above

32. Special Handling Instructions and Additional Information

See box 15, page 1

DOT ERG#: 28a) 3 | 28b) 27 28c) 27

TRANSPORTER

33. Transporter ____ Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

34. Transporter ____ Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date Month Day Year

FACILITY

35. Discrepancy Indication Space

CHEMPAK®

ROLLINS **CHEMPAK** INC.

NOTIFICATION per 40 CFR 268.7 for APPENDIX IV/V LAB PACKS ONLY

PART I: Generator and Manifest Information

Generator Name: Kaiser Resources

Address: 8300 Utica Ave Ste#301 91730

City: Rancho Cucamonga State: CA Zip Code: 92239

Telephone: area code (909)- 944-4163 EPA ID#: CAD003934890

STATE Manifest #(s): CA 92058275 RES Stream (one only) # OP16385

PART II: Waste Subject to Land Disposal Restrictions:

Pursuant to 40 CFR 268.7 I am notifying the following facility (check one):

o Rollins Environmental Services (LA) o Rollins Environmental Services (TX)
o Rollins Environmental Services (NJ) X OPC o TET;

that under the above RES stream number and State Manifest Number(s), I am shipping to you a waste identified by the EPA waste numbers circled on attached page 2-list of applicable waste codes-, which are subject to the EPA Land Disposal Restrictions. These wastes were prepared in accordance to 40 CFR 268.42 and are:(Check 1a,1b or both)

X 1a. Lab packs containing only waste listed in 40 CFR 268, Appendix IV, and may contain appropriate non-RCRA solid waste. (Check statement 2-Part III). These lab packs must be treated in accordance with 268.42(c) by INCIN*, followed by treatment of D004-008, D010,D011 metals per 268.41(a). These lab packs contain the below checked metals:

O D004 O D005 O D006 O D007 X D008 O D010 O D011

O 1b. Lab packs containing only organic wastes listed in 40 CFR 268, Appendix V, and may contain appropriate non-RCRA solid waste. (Check statement 3-Part III) These lab packs must be treated in accordance with 268.42(c) by INCIN.*

PART III: Authorized Representative (Check 2,3 or both as indicated above and sign)

X 2. I certify under penalty of law that I personally have examined and am familiar with the waste and that the lab pack contains only the wastes specified in Appendix IV to Part 268 or solid wastes not subject to regulations under Part 261. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment.

O 3. I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste and that the lab pack contains only organic wastes specified in Appendix V to Part 268 or solid waste not subject to regulations under Part 261. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment.

Signature: X J Roberts Date: X 10-08-93

Print or Type Name: X Jeannette Roberts

Title: X Director, Eagle Mtn Operations.

* *INCIN=Incineration in a RCRA 40 CFR Part 264 subpart O facility*

All information must be completed and signed by generator.

Copyright by Rollins CHEMPAK, Inc.

Generator: Kaiser
Stream number (one only): ~~[illegible]~~ OP-16385

Date: 10/8/93

APPENDIX IV WASTE CODES (Circle all that apply)

P001, P002, P003, P004, P005, P006, P007, P008, P009, P013, P014, P015, P016, P017, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, P033, P034, P036, P037, P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048, P049, P050, P051, P054, P056, P057, P058, P059, P060, P062, P063, P064, P065, P066, P067, P068, P069, P070, P071, P072, P073, P074, P075, P077, P081, P082, P084, P085, P087, P088, P089, P092, P093, P094, P095, P096, P097, P098, P099, P101, P102, P103, P104, P105, P106, P108, P109, P110, P111, P112, P113, P114, P115, P116, P118, P119, P120, P121, P122, P123

U001, U002, U003, U004, U005, U006, U007, U008, U009, U010, U011, U012, U014, U015, U016, U017, U018, U019, U020, U021, U022, U023, U024, U025, U026, U027, U028, U029, U030, U031, U032, U033, U034, U035, U036, U037, U038, U039, U041, U042, U043, U044, U045, U046, U047, U048, U049, U050, U051, U052, U053, U055, U056, U057, U058, U059, U060, U061, U062, U063, U064, U066, U067, U068, U069, U070, U071, U072, U073, U074, U075, U076, U077, U078, U079, U080, U081, U082, U083, U084, U085, U086, U087, U088, U089, U090, U091, U092, U093, U094, U095, U096, U097, U098, U099, U101, U102, U103, U105, U106, U107, U108, U109, U110, U111, U112, U113, U114, U115, U116, U117, U118, U119, U120, U121, U122, U123, U124, U125, U126, U127, U128, U129, U130, U131, U132, U133, U136, U137, U138, U140, U141, U142, U143, U144, U145, U146, U147, U148, U149, U150, U152, U153, U154, U155, U156, U157, U158, U159, U160, U161, U162, U163, U164, U165, U166, U167, U168, U169, U170, U171, U172, U173, U174, U176, U177, U178, U179, U180, U181, U182, U183, U184, U185, U186, U187, U188, U189, U190, U191, U192, U193, U194, U196, U197, U200, U201, U202, U203, U204, U205, U206, U207, U208, U209, U210, U211, U213, U214, U215, U216, U217, U218, U219, U220, U221, U222, U223, U225, U226, U227, U228, U234, U235, U236, U237, U238, U239, U240, U243, U244, U246, U247, U248, U249

F001, F002, F003, F004, F005, F006, F010,

K001, K002, K008, K009, K010, K011, K013, K014, K015, K016, K017, K018, K019, K020, K021, K022, K023, K024, K025, K026, K027, K028, K029, K030, K031, K032, K033, K034, K035, K036, K037, K038, K039, K040, K041, K042, K043, K044, K045, K046, K047, K048, K049, K050, K051, K052, K060, K061, K069, K071, K073, K083, K084, K085, K086, K087, K093, K094, K095, K096, K097, K098, K099, K101, K102, K103, K104, K105, K113, K114, K115, K116

D001, D002, D003, D004, D005, D006, D007, D008, D010, D011, D012, D013, D014, D015, D016, D017

APPENDIX V Waste Codes (Circle all that apply)

P001, P002, P003, P004, P005, P007, P008, P009, P014, P015, P016, P017, P018, P020, P021, P022, P023, P024, P026, P027, P028, P030, P031, P033, P034, P037, P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048, P049, P050, P051, P054, P057, P058, P059, P060, P062, P063, P064, P065, P066, P067, P068, P069, P070, P071, P072, P075, P077, P081, P082, P084, P085, P088, P089, P093, P094, P095, P097, P098, P101, P102, P105, P106, P108, P109, P111, P112, P116, P118, P123

U001, U002, U003, U004, U005, U006, U007, U008, U009, U010, U011, U012, U014, U015, U016, U017, U018, U019, U020, U021, U022, U023, U024, U025, U026, U027, U028, U029, U030, U031, U033, U034, U035, U036, U037, U038, U039, U041, U042, U043, U044, U045, U046, U047, U048, U049, U050, U052, U053, U055, U056, U057, U058, U059, U060, U061, U062, U063, U064, U066, U067, U068, U069, U070, U071, U072, U073, U074, U075, U076, U077, U078, U079, U080, U081, U082, U083, U084, U085, U086, U087, U088, U089, U090, U091, U092, U093, U094, U095, U096, U097, U098, U099, U101, U102, U103, U105, U106, U107, U108, U109, U110, U111, U112, U113, U114, U115, U116, U117, U118, U119, U120, U121, U122, U123, U124, U125, U126, U127, U128, U129, U130, U131, U132, U133, U135, U137, U138, U140, U141, U142, U143, U147, U148, U149, U150, U152, U153, U154, U155, U156, U157, U158, U159, U160, U161, U162, U163, U164, U165, U166, U167, U168, U169, U170, U171, U172, U173, U174, U176, U177, U178, U179, U180, U181, U182, U183, U184, U185, U186, U187, U188, U189, U190, U191, U192, U193, U194, U196, U197, U200, U201, U202, U203, U206, U207, U208, U209, U210, U211, U213, U218, U219, U220, U221, U222, U223, U225, U226, U227, U228, U234, U235, U236, U237, U238, U239, U240, U243, U244, U246, U247, U248, U249

F001, F002, F003, F004, F005, F010,

K001, K009, K010, K011, K013, K014, K015, K016, K017, K018, K019, K020, K021, K022, K023, K024, K025, K026, K027, K029, K030, K031, K032, K033, K034, K035, K036, K037, K038, K039, K040, K041, K042, K043, K044, K045, K046, K047, K048, K049, K050, K051, K052, K054, K060, K065, K073, K083, K084, K085, K086, K087, K093, K094, K095, K096, K097, K098, K099, K101, K102, K103, K104, K105, K111, K112, K113, K114, K115, K116, K117, K118, K123, K124, K125, K126, K136,

D001, D012, D013, D014, D015, D016, D017

ROLLINS ENVIRONMENTAL SERVICES

LAND DISPOSAL RESTRICTION (LDR) NON-WASTEWATER NOTIFICATION

Section A, B, C, & D Completed by Generator (Instructions on Page 2)

SECTION A. GENERATOR NOTIFICATION

1. GENERATOR: Kaiser Resources
2. EPA I.D. NO. CAD 003 934 890
3. MANIFEST NO.: CA 9205 8275
4. STREAM NO.: OP-16385
5. PURSUANT TO 40 CFR §268.7, I am notifying (Check One):

☐ RES (NJ) ☐ RES (LA) ☐ RES (TX) ☐ RES of LA ☒ OPC ☐ TET

that under the above RES Waste Stream number, I am shipping to you one of the following types of waste.

(Check either (a) or (b) **only**):

a. ☒ A ***non-wastewater*** (other than contaminated debris) identified by the EPA waste code(s) and subcategory(ies) that I have checked in Section D. of this form. Submit Attachment 1 for F001-F005, F039, and California List wastes only.

b. ☐ A ***hazardous debris*** waste identified by the EPA waste code(s) and subcategory(ies) that I have checked in Section D. of this form. Submit Attachment 1 for F001-F005, F039, and California List wastes only.

PLEASE NOTE: Hazardous debris is solid material exceeding 60 mm particle size and which contains on its surface or in its pores a waste subject to the Land Disposal Restriction. (Regulatory Reference 40 CFR §268.2 [g] and [h]). The requirement for treatment of hazardous debris pursuant to 40 CFR §268.45 becomes effective May 8, 1993.

SECTION B. CALIFORNIA LIST APPLICABILITY FOR EPA HAZARDOUS WASTES

Check one or more box(es) below, if applicable (DOES NOT apply to ***newly listed*** wastes).

1. ☐ A D001-D011 liquid[1] or non-liquid waste containing halogenated organic compounds (HOCs) ≥ 1000 ppm as specified in 40 CFR §268, Appendix III.
2. ☐ A liquid[1] hazardous waste containing polychlorinated biphenyls (PCBs)[2] ≥ 50 ppm.
3. ☐ A D001-D017 liquid[1] waste containing ≥ 134 mg/l of nickel and/or ≥ 130 mg/l of thallium.
4. ☐ A liquid[1] or non-liquid hazardous waste subject to a National Capacity Variance which meets the definition of a California List Waste (Refer to Attachment 1 [page 2] for the California List definition).

[1] To determine whether a waste is liquid or contains ***free liquid***, use the Paint Filter Test (EPA SW-846, Method 9095).
[2] Incineration in a TSCA permitted incinerator [RES (TX) only].

SECTION C. GENERATOR CERTIFICATION (Authorized Representative)

I hereby certify and warrant that all the information supplied on this form and all associated documents represents a complete and accurate identification of this waste material.

1. Print or Type Name: Jeannette Roberts
2. Date: 10, 08, 93
3. Signature: J Roberts
4. Title: Director, Eagle Mtn Oper.

PLEASE NOTE: If your waste already meets relevant treatment standards or your waste is a wastewater or an Appendix IV or Appendix V Lab Pack, please contact your Rollins Sales/Customer Service office for the additional or alternate certification form. For your convenience regional office addresses and phone numbers are listed on the back of Attachment 1.

© *Rollins Environmental Services (Sales) Inc. 1992*

Turn to Page 2

SECTION D.
WASTE TREATMENT STA ARD TABLES
NON-WASTEWATER

INSTRUCTIONS

1. After completion of Sections A, B, and C on page 1, check *ALL* EPA waste codes applicable to this waste in Section D provided for you on pages 2, 3, and 4. For any waste codes not listed in Section D, additional space has been provided on page 4.

   PLEASE NOTE: In Section D you are only required to check the applicable EPA waste code listed under Column 1. Columns 2, 3, and 4 have been completed in advance by Rollins Environmental Services in accordance with the Land Disposal Restrictions.

2. Attachment 1, Notification of F001-F005, F039, and California List wastes, should be submitted only for those wastes.

DEFINITIONS
(As Referenced in Waste Treatment Standard Tables)

1. EPA WASTE CODE SUBCATEGORIES:

- A = Anhydrous
- ALK = Alkaline
- C = Corrosive
- CB = Cadmium Battery
- CS = Calcium Sulfate
- E = Explosives
- H = Hydrated
- HM = High Mercury (≥260 mg/kg)
- LB = Lead Acid Battery
- LIQ = Liquid
- LM = Low Mercury (<260 mg/kg)
- NCS = Non-Calcium Sulfate
- OX = Oxidizer
- R = Reactive
- RC = Reactive Cyanides
- RS = Reactive Sulfides
- S = Solid
- TOC = Total Organic Carbon
- WR = Water Reactive
- WW = Wastewater (<1% Total Organic Carbon and < 1% Total Suspended Solids)

2. TECHNOLOGY CODES:

- ADGAS = Venting of Compressed Gases followed by neutralization (INCIN acceptable technology)
- DEACT = Deactivation of hazardous characteristics (INCIN acceptable technology)
- IMERC = Incineration of organics and mercury contaminated waste
- INCIN = Incineration
- STABL = Stabilization

"D" CHARACTERISTIC WASTE CODES
Check All Applicable Waste Code(s)

(1) EPA CODE NUMBER	(2) 40 CFR §268.41 CCWE	(3) 40 CFR §268.42 TECH	(4) 40 CFR §268.43 CCW
☐ D001GAS	N.A.	DEACT	N.A.
☐ D001LIQ <10%TOC	N.A.	DEACT	N.A.
☑ D001LIQ >10%TOC	N.A.	INCIN	N.A
☐ D001OX	N.A.	DEACT	N.A.
☐ D001R	N.A.	DEACT	N.A.
☐ D002ACID	N.A.	DEACT	N.A.
☐ D002ALK	N.A.	DEACT	N.A.
☐ D002C	N.A.	DEACT	N.A.
D003E	DO NOT ACCEPT		
☐ D003R	N.A.	DEACT	N.A.
☐ D003RC	N.A.	N.A.	✓
☐ D003RS	N.A.	DEACT	N.A.
☐ D003WR	N.A.	DEACT	N.A.
☐ D004	✓	N.A.	N.A.
☐ D005	✓	N.A.	N.A.
☐ D006	✓	N.A.	N.A.
D006CB	DO NOT ACCEPT		
☐ D007	✓	N.A.	N.A.
D008LB	DO NOT ACCEPT		
☑ D008	✓	N.A.	N.A.
D009HM	DO NOT ACCEPT		
☐ D009LM	✓	N.A.	N.A.
☐ D010	✓	N.A.	N.A.
☐ D011	✓	N.A.	N.A.
☐ D012	N.A.	N.A.	✓
☐ D013	N.A.	N.A.	✓
☐ D014	N.A.	N.A.	✓

(1) EPA CODE NUMBER	(2) 40 CFR §268.41 CCWE	(3) 40 CFR §268.42 TECH	(4) 40 CFR §268.43 CCW
☐ D015	N.A.	N.A.	✓
☐ D016	N.A.	N.A	✓
☐ D017	N.A.	N.A.	✓
☐ D018	NEWLY LISTED WASTE — Not Currently Regulated Under Land Disposal Restrictions		
☐ D019			
☐ D020			
☐ D021			
☐ D022			
☐ D023			
☐ D024			
☐ D025			
☐ D026			
☐ D027			
☐ D028			
☐ D029			
☐ D030			
☐ D031			
☐ D032			
☐ D033			
☐ D034			
☐ D035			
☐ D036			
☐ D037			
☐ D038			
☐ D039			
☐ D040			
☐ D041			
☐ D042			
☐ D043			

"F" LISTED WASTE CODES
Check All Applicable Waste Code(s)

(1) EPA CODE NUMBER	(2) 40 CFR §268.41 CCWE	(3) 40 CFR §268.42 TECH	(4) 40 CFR §268.43 CCW
☐ F001*	✓	N.A.	✓
☐ F002*	✓	N.A.	✓
☐ F003*	✓	N.A.	✓
☐ F004*	✓	N.A.	✓
☐ F005*	✓	INCIN**	✓
☐ F006	✓	N.A.	✓
☐ F007	✓	N.A.	✓
☐ F008	✓	N.A.	✓
☐ F009	✓	N.A.	✓
☐ F010	N.A.	N.A.	✓
☐ F011	✓	N.A.	✓
☐ F012	✓	N.A.	✓
☐ F019	✓	N.A.	✓
F020	DO NOT ACCEPT		

(1) EPA CODE NUMBER	(2) 40 CFR §268.41 CCWE	(3) 40 CFR §268.42 TECH	(4) 40 CFR §268.43 CCW
F021	DO NOT ACCEPT		
F022	DO NOT ACCEPT		
F023	DO NOT ACCEPT		
☐ F024	✓	INCIN	✓
☐ F025	N.A.	N.A.	✓
F026	DO NOT ACCEPT		
F027	DO NOT ACCEPT		
F028	DO NOT ACCEPT		
☐ F032	NEWLY LISTED WASTE — Not Currently Regulated Under Land Disposal Restrictions		
☐ F034			
☐ F035			
☐ F037	National Capacity Variance		
☐ F038			
☐ F039*	✓	N.A.	✓

* Submit Attachment 1; see note in CCWE Table for F001-F005.
** INCIN only for 2-Nitropropane, 2-Ethyoxyethanol

Turn to Page 3

"K" LISTED WASTE CODES

Check All Applicable Waste Code(s)

(1) EPA CODE NUMBER	(2) 40 CFR §268.41 CCWE	(3) 40 CFR §268.42 TECH	(4) 40 CFR §268.43 CCW
☐ K001	✓	N.A.	✓
☐ K002	✓	N.A.	N.A.
☐ K003	✓	N.A.	N.A.
☐ K004	✓	N.A.	N.A.
☐ K005	✓	N.A.	N.A.
☐ K006A	✓	N.A.	N.A.
☐ K006H	✓	N.A.	N.A.
☐ K007	✓	N.A.	N.A.
☐ K008	✓	N.A.	N.A.
☐ K009	N.A.	N.A.	✓
☐ K010	N.A.	N.A.	✓
☐ K011	N.A.	N.A.	✓
☐ K013	N.A.	N.A.	✓
☐ K014	N.A.	N.A.	✓
☐ K015	✓	N.A.	✓
☐ K016	N.A.	N.A.	✓
☐ K017	N.A.	N.A.	✓
☐ K018	N.A.	N.A.	✓
☐ K019	N.A.	N.A.	✓
☐ K020	N.A.	N.A.	✓
☐ K021	✓	N.A.	✓
☐ K022	✓	N.A.	✓
☐ K023	N.A.	N.A.	✓
☐ K024	N.A.	N.A.	✓
☐ K025	N.A.	INCIN	N.A.
☐ K026	N.A.	INCIN	N.A.
☐ K027	N.A.	INCIN	N.A.
K028	DO NOT ACCEPT		
☐ K029	N.A.	N.A.	✓
☐ K030	N.A.	N.A.	✓
☐ K031	✓	N.A.	N.A.
☐ K032	N.A.	N.A.	✓
☐ K033	N.A.	N.A.	✓
☐ K034	N.A.	N.A.	✓
☐ K035	N.A.	N.A.	✓
☐ K036	N.A.	N.A.	✓
☐ K037	N.A.	N.A.	✓
☐ K038	N.A.	N.A.	✓
☐ K039	N.A.	INCIN	N.A.
☐ K040	N.A.	N.A.	✓
☐ K041	N.A.	N.A.	✓
☐ K042	N.A.	N.A.	✓
K043	DO NOT ACCEPT		
☐ K044	N.A.	DEACT	N.A.
☐ K045	N.A.	DEACT	N.A.
☐ K046	✓	N.A.	N.A.
☐ K047	N.A.	DEACT	N.A.
☐ K048	✓	N.A.	✓
☐ K049	✓	N.A.	✓
☐ K050	✓	N.A.	✓
☐ K051	✓	N.A.	✓
☐ K052	✓	N.A.	✓
☐ K060	N.A.	N.A.	✓
K061	DO NOT ACCEPT		
☐ K062	✓	N.A.	N.A.

EPA CODE NUMBER	(2) 40 CFR §268.41 CCWE	(3) 40 CFR §268.42 TECH	(4) 40 CFR §268.43 CCW
☐ K064	NEWLY LISTED WASTE Not Currently Regulated Under Land Disposal Restrictions		
☐ K065			
☐ K066			
☐ K069CS	✓	N.A.	N.A.
K069NCS	DO NOT ACCEPT		
☐ K071	✓	N.A.	N.A.
☐ K073	N.A.	N.A.	✓
☐ K083	✓	N.A.	✓
☐ K084	✓	N.A.	N.A.
☐ K085	N.A.	N.A.	✓
☐ K086	✓	N.A.	✓
☐ K087	✓	N.A.	✓
☐ K088	NEWLY LISTED WASTE Not Currently Regulated Under Land Disposal Regulations		
☐ K090			
☐ K091			
☐ K093	N.A.	N.A.	✓
☐ K094	N.A.	N.A.	✓
☐ K095	N.A.	N.A.	✓
☐ K096	N.A.	N.A.	✓
☐ K097	N.A.	N.A.	✓
☐ K098	N.A.	N.A.	✓
K099	DO NOT ACCEPT		
☐ K100	✓	N.A.	N.A.
☐ K101	✓	N.A.	N.A.
☐ K102	✓	N.A.	✓
☐ K103	N.A.	N.A.	✓
☐ K104	N.A.	N.A.	✓
☐ K106	N.A.	N.A.	✓
K106HM	DO NOT ACCEPT		
☐ K106LM	✓	N.A.	N.A.
☐ K107	N.A.	INCIN	N.A.
☐ K108	N.A.	INCIN	N.A.
☐ K109	N.A.	INCIN	N.A.
☐ K110	N.A.	INCIN	N.A.
☐ K111	N.A.	N.A.	✓
☐ K112	N.A.	INCIN	N.A.
☐ K113	N.A.	INCIN	N.A.
☐ K114	N.A.	INCIN	N.A.
☐ K115	✓	INCIN	N.A.
☐ K116	N.A.	INCIN	N.A.
☐ K117	N.A.	N.A.	✓
☐ K118	N.A.	N.A.	✓
☐ K123	N.A.	INCIN	N.A.
☐ K124	N.A.	INCIN	N.A.
☐ K125	N.A.	INCIN	N.A.
☐ K126	N.A.	INCIN	N.A.
☐ K131	N.A.	N.A.	✓
☐ K132	N.A.	N.A.	✓
☐ K136	N.A.	N.A.	✓
☐ K141	NEWLY LISTED WASTE Not Currently Regulated Under Land Disposal Restrictions		
☐ K142			
☐ K143			
☐ K144			
☐ K145			
☐ K147			
☐ K148			

"P" LISTED WA[illegible] CODES

Check All Applicable Waste Codes

(1) EPA CODE NUMBER	(2) 40 CFR §268.41 CCWE	(3) 40 CFR §268.42 TECH	(4) 40 CFR §268.43 CCW
☐ P001	N.A.	INCIN	N.A.
☐ P002	N.A.	INCIN	N.A.
☐ P003	N.A.	INCIN	N.A.
☐ P004	N.A.	N.A.	✓
☐ P005	N.A.	INCIN	N.A.
☐ P006	N.A.	INCIN	N.A.
☐ P007	N.A.	INCIN	N.A.
☐ P008	N.A.	INCIN	N.A.
☐ P009	N.A.	INCIN	N.A.
☐ P010	✓	N.A.	N.A.
☐ P011	✓	N.A.	N.A.
☐ P012	✓	N.A.	N.A.
☐ P013	✓	N.A.	✓
☐ P014	N.A.	INCIN	N.A.
P015	DO NOT ACCEPT		
☐ P016	N.A.	INCIN	N.A.
☐ P017	N.A.	INCIN	N.A.
☐ P018	N.A.	INCIN	N.A.
☐ P020	N.A.	N.A.	✓
☐ P021	N.A.	N.A.	✓
☐ P022	N.A.	INCIN	N.A.
☐ P023	N.A.	INCIN	N.A.
☐ P024	N.A.	N.A.	✓
☐ P026	N.A.	INCIN	N.A.
☐ P027	N.A.	INCIN	N.A.
☐ P028	N.A.	INCIN	N.A.
☐ P029	N.A.	N.A.	✓
☐ P030	N.A.	N.A.	✓
☐ P031	N.A.	INCIN	N.A.
☐ P033	N.A.	INCIN	N.A.
☐ P034	N.A.	INCIN	N.A.
☐ P036	✓	N.A.	N.A.
☐ P037	N.A.	N.A.	✓
☐ P038	✓	N.A.	N.A.
☐ P039	N.A.	N.A.	✓
☐ P040	N.A.	INCIN	N.A.
☐ P041	N.A.	INCIN	N.A.
☐ P042	N.A.	INCIN	N.A.
☐ P043	N.A.	INCIN	N.A.
☐ P044	N.A.	INCIN	N.A.
☐ P045	N.A.	INCIN	N.A.
☐ P046	N.A.	INCIN	N.A.
☐ P047	N.A.	INCIN	✓
☐ P048	N.A.	N.A.	✓
☐ P049	N.A.	INCIN	N.A.
☐ P050	N.A.	N.A.	✓
☐ P051	N.A.	N.A.	✓
☐ P054	N.A.	INCIN	N.A.
☐ P056	N.A.	ADGAS	N.A.
☐ P057	N.A.	INCIN	N.A.
☐ P058	N.A.	INCIN	N.A.
☐ P059	N.A.	N.A.	✓
☐ P060	N.A.	N.A.	✓
☐ P062	N.A.	INCIN	N.A.

EPA CODE NUMBER	(2) 40 CFR §268.41 CCWE	(3) 40 CFR §268.42 TECH	(4) 40 CFR §268.43 CCW
☐ P063	N.A.	N.A.	✓
☐ P064	N.A.	INCIN	N.A.
P065HM	DO NOT ACCEPT		
☐ P065LM	✓	IMERC	N.A.
☐ P066	N.A.	INCIN	N.A.
☐ P067	N.A.	INCIN	N.A.
☐ P068	N.A.	INCIN	N.A.
☐ P069	N.A.	INCIN	N.A.
☐ P070	N.A.	INCIN	N.A.
☐ P071	N.A.	N.A.	✓
☐ P072	N.A.	INCIN	N.A.
☐ P073	✓	N.A.	N.A.
☐ P074	✓	N.A.	✓
☐ P075	N.A.	INCIN	N.A.
P076	DO NOT ACCEPT		
☐ P077	N.A.	N.A.	✓
P078	DO NOT ACCEPT		
☐ P081	N.A.	INCIN	N.A.
☐ P082	N.A.	INCIN	N.A.
☐ P084	N.A.	INCIN	N.A.
☐ P085	N.A.	INCIN	N.A.
P087	DO NOT ACCEPT		
☐ P088	N.A.	INCIN	N.A.
☐ P089	N.A.	N.A.	✓
P092HM	DO NOT ACCEPT		
☐ P092LM	✓	IMERC	N.A.
☐ P093	N.A.	INCIN	N.A.
☐ P094	N.A.	N.A.	✓
☐ P095	N.A.	INCIN	N.A.
☐ P096	N.A.	INCIN	N.A.
☐ P097	N.A.	N.A.	✓
☐ P098	N.A.	N.A.	✓
☐ P099	✓	N.A.	✓
☐ P101	N.A.	N.A.	✓
☐ P102	N.A.	INCIN	N.A.
☐ P103	✓	N.A.	N.A.
☐ P104	✓	N.A.	✓
☐ P105	N.A.	INCIN	[illegible]
☐ P106	N.A.	N.A.	[illegible]
☐ P108	N.A.	INCIN	[illegible]
☐ P109	N.A.	INCIN	[illegible]
☐ P110	✓	N.A.	[illegible]
☐ P111	N.A.	INCIN	[illegible]
☐ P112	N.A.	INCIN	[illegible]
☐ P113	N.A.	STABL	[illegible]
☐ P114	✓	N.A.	N.A.
☐ P115	N.A.	STABL	N.A.
☐ P116	N.A.	INCIN	N.A.
☐ P118	N.A.	IMERC	N.A.
☐ P119	N.A.	STABL	N.A.
☐ P120	N.A.	STABL	N.A.
☐ P121	N.A.	N.A.	✓
☐ P122	N.A.	INCIN	N.A.
☐ P123	N.A.	N.A.	✓

Turn to Page [illegible]

"U" LISTED WASTE CODES

Applicable Waste Code(s)

(1) EPA CODE NUMBER	(2) 40 CFR §268.41 CCWE	(3) 40 CFR §268.42 TECH	(4) 40 CFR §268.43 CCW
☐ U001	N.A.	INCIN	N.A.
☐ U002	N.A.	N.A.	✓
☐ U003	N.A.	INCIN	N.A.
☐ U004	N.A.	N.A.	✓
☐ U005	N.A.	N.A.	✓
☐ U006	N.A.	INCIN	N.A.
☐ U007	N.A.	INCIN	N.A.
☐ U008	N.A.	INCIN	N.A.
☐ U009	N.A.	N.A.	✓
☐ U010	N.A.	INCIN	N.A.
☐ U011	N.A.	INCIN	N.A.
☐ U012	N.A.	N.A.	✓
☐ U014	N.A.	INCIN	N.A.
☐ U015	N.A.	INCIN	N.A.
☐ U016	N.A.	INCIN	N.A.
☐ U017	N.A.	INCIN	N.A.
☐ U018	N.A.	N.A.	✓
☐ U019	N.A.	N.A.	✓
☐ U020	N.A.	INCIN	N.A.
☐ U021	N.A.	INCIN	N.A.
☐ U022	N.A.	N.A.	✓
☐ U023	N.A.	INCIN	N.A.
☐ U024	N.A.	N.A.	✓
☐ U025	N.A.	N.A.	✓
☐ U026	N.A.	INCIN	N.A.
☐ U027	N.A.	N.A.	✓
☐ U028	N.A.	N.A.	✓
☐ U029	N.A.	N.A.	✓
☐ U030	N.A.	N.A.	✓
☐ U031	N.A.	N.A.	✓
☐ U032	✓	N.A.	N.A.
☐ U033	N.A.	INCIN	N.A.
☐ U034	N.A.	INCIN	N.A.
☐ U035	N.A.	INCIN	N.A.
☐ U036	N.A.	N.A.	✓
☐ U037	N.A.	N.A.	✓
☐ U038	N.A.	INCIN	N.A.
☐ U039	N.A.	N.A.	✓
☐ U041	N.A.	INCIN	N.A.
☐ U042	N.A.	INCIN	N.A.
☐ U043	N.A.	N.A.	✓
☐ U044	N.A.	N.A.	✓
☐ U045	N.A.	N.A.	✓
☐ U046	N.A.	INCIN	N.A.
☐ U047	N.A.	N.A.	✓
☐ U048	N.A.	N.A.	✓
☐ U049	N.A.	INCIN	N.A.
☐ U050	N.A.	N.A.	✓
☐ U051	✓	N.A.	✓
☐ U052	N.A.	N.A.	✓
☐ U053	N.A.	INCIN	N.A.
☐ U055	N.A.	INCIN	N.A.
☐ U056	N.A.	INCIN	N.A.
☐ U057	N.A.	INCIN	N.A.
☐ U058	N.A.	INCIN	N.A.
☐ U059	N.A.	INCIN	N.A.
☐ U060	N.A.	N.A.	✓
☐ U061	N.A.	N.A.	✓
☐			

(1) EPA CODE NUMBER	(2) 40 CFR §268.41 CCWE	(3) 40 CFR §268.42 TECH	(4) 40 CFR §268.43 CCW
☐ U062	N.A.	INCIN	N.A.
☐ U063	N.A.	N.A.	✓
☐ U064	N.A.	INCIN	N.A.
☐ U066	N.A.	N.A.	✓
☐ U067	N.A.	N.A.	✓
☐ U068	N.A.	N.A.	✓
☐ U069	N.A.	N.A.	✓
☐ U070	N.A.	N.A.	✓
☐ U071	N.A.	N.A.	✓
☐ U072	N.A.	N.A.	✓
☐ U073	N.A.	INCIN	N.A.
☐ U074	N.A.	INCIN	N.A.
☐ U075	N.A.	N.A.	✓
☐ U076	N.A.	N.A.	✓
☐ U077	N.A.	N.A.	✓
☐ U078	N.A.	N.A.	✓
☐ U079	N.A.	N.A.	✓
☐ U080	N.A.	N.A.	✓
☐ U081	N.A.	N.A.	✓
☐ U082	N.A.	N.A.	✓
☐ U083	N.A.	N.A.	✓
☐ U084	N.A.	N.A.	✓
☐ U085	N.A.	INCIN	N.A.
☐ U086	N.A.	INCIN	N.A.
☐ U087	N.A.	INCIN	N.A.
☐ U088	N.A.	N.A.	✓
☐ U089	N.A.	INCIN	N.A.
☐ U090	N.A.	INCIN	N.A.
☐ U091	N.A.	INCIN	N.A.
☐ U092	N.A.	INCIN	N.A.
☐ U093	N.A.	INCIN	N.A.
☐ U094	N.A.	INCIN	N.A.
☐ U095	N.A.	INCIN	N.A.
☐ U096	N.A.	INCIN	N.A.
☐ U097	N.A.	INCIN	N.A.
☐ U098	N.A.	INCIN	N.A.
☐ U099	N.A.	INCIN	N.A.
☐ U101	N.A.	N.A.	✓
☐ U102	N.A.	N.A.	✓
☐ U103	N.A.	INCIN	N.A.
☐ U105	N.A.	N.A.	✓
☐ U106	N.A.	N.A.	✓
☐ U107	N.A.	N.A.	✓
☐ U108	N.A.	N.A.	✓
☐ U109	N.A.	INCIN	N.A.
☐ U110	N.A.	INCIN	N.A.
☐ U111	N.A.	N.A.	✓
☐ U112	N.A.	N.A.	✓
☐ U113	N.A.	INCIN	N.A.
☐ U114	N.A.	INCIN	N.A.
☐ U115	N.A.	INCIN	N.A.
☐ U116	N.A.	INCIN	N.A.
☐ U117	N.A.	N.A.	✓
☐ U118	N.A.	N.A.	✓
☐ U119	N.A.	INCIN	N.A.
☐ U120	N.A.	N.A.	✓
☐ U121	N.A.	N.A.	✓
☐ U122	N.A.	INCIN	N.A.
☐			

"U" LISTED WASTE CO

Check All Applicable Waste Code(s)

(1) EPA CODE NUMBER	(2) 40 CFR §268.41 CCWE	(3) 40 CFR §268.42 TECH	(4) 40 CFR §268.43 CCW
☐ U123	N.A.	INCIN	N.A.
☐ U124	N.A.	INCIN	N.A.
☐ U125	N.A.	INCIN	N.A.
☐ U126	N.A.	INCIN	N.A.
☐ U127	N.A.	N.A.	✓
☐ U128	N.A.	N.A.	✓
☐ U129	N.A.	N.A.	✓
☐ U130	N.A.	N.A.	✓
☐ U131	N.A.	N.A.	✓
☐ U132	N.A.	INCIN	N.A.
☐ U133	N.A.	INCIN	N.A.
☐ U134	N.A.	ADGAS	N.A.
☐ U135	N.A.	INCIN	N.A.
☐ U136	✓	N.A.	N.A.
☐ U137	N.A.	N.A.	✓
☐ U138	N.A.	N.A.	✓
☐ U140	N.A.	N.A.	✓
☐ U141	N.A.	N.A.	✓
☐ U142	N.A.	N.A.	✓
☐ U143	N.A.	INCIN	N.A.
☐ U144	✓	N.A.	N.A.
☐ U145	✓	N.A.	N.A.
☐ U146	✓	N.A.	N.A.
☐ U147	N.A.	INCIN	N.A.
☐ U148	N.A.	INCIN	N.A.
☐ U149	N.A.	INCIN	N.A.
☐ U150	N.A.	INCIN	N.A.
U151HM	DO NOT ACCEPT		
☐ U151LM	✓	N.A.	N.A.
☐ U152	N.A.	N.A.	✓
☐ U153	N.A.	INCIN	N.A.
☐ U154	N.A.	INCIN	N.A.
☐ U155	N.A.	N.A.	✓
☐ U156	N.A.	INCIN	N.A.
☐ U157	N.A.	N.A.	✓
☐ U158	N.A.	N.A.	✓
☐ U159	N.A.	N.A.	✓
☐ U160	N.A.	INCIN	N.A.
☐ U161	N.A.	N.A.	✓
☐ U162	N.A.	N.A.	✓
☐ U163	N.A.	INCIN	N.A.
☐ U164	N.A.	INCIN	N.A.
☐ U165	N.A.	N.A.	✓
☐ U166	N.A.	INCIN	N.A.
☐ U167	N.A.	INCIN	N.A.
☐ U168	N.A.	INCIN	N.A.
☐ U169	N.A.	N.A.	✓
☐ U170	N.A.	N.A.	✓
☐ U171	N.A.	INCIN	N.A.
☐ U172	N.A.	N.A.	✓
☐ U173	N.A.	INCIN	N.A.
☐ U174	N.A.	N.A.	✓
☐ U176	N.A.	INCIN	N.A.
☐ U177	N.A.	INCIN	N.A.
☐ U178	N.A.	INCIN	N.A.
☐ U179	N.A.	N.A.	✓
☐ U180	N.A.	N.A.	✓
☐ U181	N.A.	N.A.	✓
☐			

(1) EPA CODE NUMBER	(2) 40 CFR §268.41 CCWE	(3) 40 CFR §268.42 TECH	(4) 40 CFR §268.43 CCW
☐ U182	N.A.	INCIN	N.A.
☐ U183	N.A.	N.A.	✓
☐ U184	N.A.	INCIN	N.A.
☐ U185	N.A.	N.A.	✓
☐ U186	N.A.	INCIN	N.A.
☐ U187	N.A.	N.A.	✓
☐ U188	N.A.	N.A.	✓
☐ U189	N.A.	INCIN	N.A.
☐ U190	N.A.	N.A.	✓
☐ U191	N.A.	INCIN	N.A.
☐ U192	N.A.	N.A.	✓
☐ U193	N.A.	INCIN	N.A.
☐ U194	N.A.	INCIN	N.A.
☐ U196	N.A.	N.A.	✓
☐ U197	N.A.	INCIN	N.A.
☐ U200	N.A.	INCIN	N.A.
☐ U201	N.A.	INCIN	N.A.
☐ U202	N.A.	INCIN	N.A.
☐ U203	N.A.	N.A.	✓
☐ U204	✓	N.A.	N.A.
☐ U205	✓	N.A.	N.A.
☐ U206	N.A.	INCIN	N.A.
☐ U207	N.A.	N.A.	✓
☐ U208	N.A.	N.A.	✓
☐ U209	N.A.	N.A.	✓
☐ U210	N.A.	N.A.	✓
☐ U211	N.A.	N.A.	✓
☐ U213	N.A.	INCIN	N.A.
☐ U214	N.A.	STABL	N.A.
☐ U215	N.A.	STABL	N.A.
☐ U216	N.A.	STABL	N.A.
☐ U217	N.A.	STABL	N.A.
☐ U218	N.A.	INCIN	N.A.
☐ U219	N.A.	INCIN	N.A.
☐ U220	N.A.	N.A.	✓
☐ U221	N.A.	INCIN	N.A.
☐ U222	N.A.	INCIN	N.A.
☐ U223	N.A.	INCIN	N.A.
☐ U225	N.A.	N.A.	✓
☐ U226	N.A.	N.A.	✓
☐ U227	N.A.	N.A.	✓
☐ U228	N.A.	N.A.	✓
☐ U234	N.A.	INCIN	N.A.
U235	DO NOT ACCEPT		
☐ U236	N.A.	INCIN	N.A.
☐ U237	N.A.	INCIN	N.A.
☐ U238	N.A.	INCIN	N.A.
☐ U239	N.A.	N.A.	✓
☐ U240	N.A.	INCIN	✓
☐ U243	N.A.	N.A.	✓
☐ U244	N.A.	INCIN	N.A.
☐ U246	N.A.	INCIN	N.A.
☐ U247	N.A.	N.A.	✓
☐ U248	N.A.	INCIN	N.A.
☐ U249	N.A.	INCIN	N.A.
☐ U328	N.A.	INCIN	N.A.
☐ U353	N.A.	INCIN	N.A.
☐ U359	N.A.	INCIN	N.A.
☐			

ROLLINS CHEMPAK INC.

Drums Coded KRE-+++.93

PAGE [illegible] OF [illegible]

TRACKING DOCUMENT FOR STREAM NUMBER(S) OP-16385	MANIFEST NUMBER(S) CA [illegible]
CUSTOMER: [illegible]	EPA ID NO. CAD003934590
LOCATION: Desert Center	DATE SHIPPED: 10/5/93

DRUM NO.	DOT SHIPPING NUMBER	DRUM TYPE	WT	US EPA WASTE NOS	PROP DISP	ACTUAL DISP TSD(1)	ACTUAL DISP TSD(2)	ADDITIONAL INFORMATION
01	Hazardous Waste Solid, n.os, 9, UN3097, PG III	1A2-20	100p	DOOF	Repact			30
[illegible]								
03								
04								
05								
06								
07								
08								
09								
[illegible]								
11								
12								
13		1G-20						30
14								
15								
16								

CHEMIST(S): [illegible]	QC TSDF(1)	QC TSDF(2)

CMP-50-310 12/88

ROLLINS **CHEMPAK** INC. Drums Coded KRE-[illegible]-97

PAGE [illegible] OF [illegible]

TRACKING DOCUMENT FOR STREAM NUMBER(S) OP-16385	MANIFEST NUMBER(S) CA 920[illegible]
CUSTOMER: [illegible]	EPA ID NO. CAD003 934890
LOCATION: Desert Springs	DATE SHIPPED: 10/5/97

DRUM NO.	DOT SHIPPING NUMBER	DRUM TYPE	WT	US EPA WASTE NOS	PROP DISP	ACTUAL DISP TSD(1)	ACTUAL DISP TSD(2)	ADDITIONAL INFORMATION
17	Hazardous waste Solid, [illegible] UN3077, PG III	16.20	100p	DOOS	Repack			[illegible]
		16.30						
19								
20								
21								
22		1A2.55	700p					
23								
24								
25		1A2.55	900p	NP				
26								
27								
28								
29								
30								
31								
32								

CHEMIST(S): [illegible]	QC TSDF(1)	QC TSDF(2)

CMP-50-310 12/88

ROLLINS **CHEMPAK** INC. Drums Coded KRF-xxx-93 PAGE ___ OF ___

TRACKING DOCUMENT FOR STREAM NUMBER(S)		MANIFEST NUMBER(S):
CUSTOMER: Kaiser	EPA ID NO. CAD003934890	CA 920[illegible]
LOCATION: Desert Springs	DATE SHIPPED: 10/9/93	

DRUM NO.	DOT SHIPPING NUMBER	DRUM TYPE	WT	US EPA WASTE NOS	PROP DISP	ACTUAL DISP TSD(1)	ACTUAL DISP TSD(2)	ADDITIONAL INFORMATION
33	Residue Lost Contained Hazardous Waste Solid, n.os, 9, UN3077, PG III	AZ-55	25p	MR	Crush			
[illegible]								
35								
36								
37								
38								
39	Hazardous Waste Solid, n.os, 9, UN3077, PG III	K-20	90p	DOOF	Resstrix			-02
40								
41								
[illegible]			40p					
45	Hazardous Waste Liquid, n.os, 9, UN3082 PG III		50p					
46	Hazardous Waste Solid, n.os, 9, UN3077, PG III		75p	MR				
47								
48								
49								
50	Waste Flammable Liquid, n.os, 9, UN1993, PG II		40p	DOOL				

CHEMIST(S): CA	QC TSDF(1)	QC TSDF(2)

CMP-50-310 12/88

ROLLINS **CHEMPAK** INC.

[illegible]

PAGE 4 OF

TRACKING DOCUMENT FOR STREAM NUMBER(S) [illegible]		MANIFEST NUMBER(S): CA 92055275
CUSTOMER: Kaiser	EPA ID NO. [illegible]	
LOCATION: Desert springs	DATE SHIPPED: [illegible]	

DRUM NO.	DOT SHIPPING NUMBER	DRUM TYPE	WT	US EPA WASTE NOS	PROP DISP	ACTUAL DISP TSD(1)	ACTUAL DISP TSD(2)	ADDITIONAL INFORMATION
51	[illegible]	1G-20	40p	D001	Distillation			.02 AD
52	↓	1A2-55	150p	↓	BSB			.01
53	Residue [illegible]	1A2-55	25p	NR	Crush			.46

CHEMIST(S): CM	QC TSDF(1)	QC TSDF(2)

CMP-50-310 12/86

CHEMPAK DRUM INVENTORY SHEET

Non-Radioactive Non-Dioxin Non-Explosive

CUSTOMER SITE: Kaiser Des.

Stream # OP-16385-30 Drum # KRF-B01-> B12-93 Date: 10/7/93	WASTE TYPE: ☐ Appendix IV/V LP ☐ Non-Appendix LP ☐ Aerosols ☒ Bulk/Specification	☐ PIH Haz. Zone: PIH Description: ☒ Packing Group: III	Chemist/Technician CH/MB	OSHA Carcinogen: ☐ YES ☒ NO INFECTIOUS/MEDICAL WASTE: ☐ YES ☒ NO ASBESTOS: ☐ YES ☒ NO

DRUM TYPE: ☐ 1A1- ____ ☐ 1G- ____ ☐ 1H1- ____ ☒ 1D- 20 ☐ 4G- ____ ☐ 1H2- ____ OTHER: ____	☐ Div. 2.1 ☐ Div. 2.2 ☐ Div. 2.3 ☐ Class 3 ☐ Div. 4.1 ☐ Div. 4.2 ☐ Div. 4.3 ☐ Div. 5.1 ☐ Div. 5.2 ☐ Div. 6.1 ☐ Div. 6.2 ☐ Class 8 ☒ Class 9 ☐ Non-Dot/Non-Reg	☐ Lab Pack ☒ Bulk ☐ Reactive ☐ Kiln ☐ Blend ☐ DA ☐ T-OX ☐ S&E ☐ LF ☒ Repack ☐ PCB ☐ Aerosol ☐ 3rd Party - LOCATION: ____	

☐ RQ

DOT SHIPPING DESCRIPTION OR GENERIC SHIPPING NAME Hazardous Waste Solid, n.o.s. 9, UN3077, PG III

WASTE DESCRIPTION	CONT. TYPE	WEIGHT/VOLUME	RCRA WASTE CODES	STATE CODE	TREATMENT STD. INCIN.	TREATMENT STD. OTHER	COMMENTS
Waste Grease w/ Lead 3		1 x 100p	D008				
total Pb = 0.25p							
	12	Drums					
TOTAL WEIGHT ☐ NET ☐ GROSS 100p				APPLY	BARCODE		HERE

TREATMENT STANDARDS: If Appendix IV/V Lab Pack check INCIN, other — add specific technology or CCWE, CCW

CMP-50-305 Rev. 4/93

CHEMPAK DRUM INVENTORY SHEET

Non-Radioactive Non-Dioxin Non-Explosive

CUSTOMER SITE: Kaiser Res

Page 1 of 1

Stream # OP-16385-30 Drum # KRE-~~B~~ 13-217-93 Date: 10/7/93	WASTE TYPE: ☐ Appendix IV/V LP ☒ Non-Appendix LP ☐ Aerosols ☐ Bulk/Specification	☐ PIH Haz. Zone: PIH Description: ☒ Packing Group: III	Chemist/Technician CH/MB	OSHA Carcinogen: ☐ YES ☒ NO INFECTIOUS/MEDICAL WASTE: ☐ YES ☒ NO ASBESTOS: ☐ YES ☒ NO

DRUM TYPE:

☐ 1A1- _____ ☒ 1G- 20 ☐ 1H1- _____

☐ 1A2- _____ ☐ 4G- _____ ☐ 1H2- _____

OTHER: _____

☐ Div. 2.1	☐ Div. 2.2	☐ Div. 2.3
☐ Class 3	☐ Div. 4.1	☐ Div. 4.2
☐ Div. 4.3	☐ Div. 5.1	☐ Div. 5.2
☐ Div. 6.1	☐ Div. 6.2	☐ Class 8
☒ Class 9	☐ Non-Dot/Non-Reg	

☒ Lab Pack	☐ Bulk	☐ Reactive
☐ Kiln	☐ Blend	☐ DA
☐ T-OX	☐ S&E	☐ LF
☒ Repack	☐ PCB	☐ Aerosol
☐ 3rd Party - LOCATION: _____		

☐ RQ

DOT SHIPPING DESCRIPTION OR GENERIC SHIPPING NAME Hazardous Waste Solid, n.os, UN3077

WASTE DESCRIPTION	CONT. TYPE	WEIGHT/VOLUME	RCRA WASTE CODES	STATE CODE	TREATMENT STD. INCIN.	TREATMENT STD. OTHER	COMMENTS
Waste Auto Grease w/ Lead (0.25p) in 20G steel Drum	M	1x100p	D008	352			
TOTAL WEIGHT ☒ NET ☐ GROSS 100p				APPLY	BARCODE		HERE

5 Drums

TREATMENT STANDARDS: If Appendix IV/V Lab Pack check INCIN, other — add specific technology or CCWE, CCW

CHEMPAK DRUM INVENTORY SHEET

Non-Radioactive Non-Dioxin Non-Explosive

CUSTOMER SITE: Kaiser

Stream # OP-16385-30

Drum # KRE-118-021.93

Date: 10/7/93

WASTE TYPE:
- ☐ Appendix IV/V LP
- ☒ Non-Appendix LP
- ☐ Aerosols
- ☐ Bulk/Specification

☐ PIH Haz. Zone:

PIH Description:

☒ Packing Group: III

Chemist/Technician: CH/MD

OSHA Carcinogen: ☐ YES ☒ NO

INFECTIOUS/MEDICAL WASTE: ☐ YES ☒ NO

ASBESTOS: ☐ YES ☒ NO

DRUM TYPE:

☐ 1A1- ____ ☒ 1G- 30 ☐ 1H1- ____

☐ ?- ____ ☐ 4G- ____ ☐ 1H2- ____

OTHER: ____

☐ Div. 2.1	☐ Div. 2.2	☐ Div. 2.3
☐ Class 3	☐ Div. 4.1	☐ Div. 4.2
☐ Div. 4.3	☐ Div. 5.1	☐ Div. 5.2
☐ Div. 6.1	☐ Div. 6.2	☐ Class 8
☒ Class 9	☐ Non-Dot/Non-Reg	

☒ Lab Pack	☐ Bulk	☐ Reactive
☐ Kiln	☐ Blend	☐ DA
☐ T-OX	☐ S&E	☐ LF
☒ Repack	☐ PCB	☐ Aerosol

☐ 3rd Party - LOCATION: ____

☐ RQ

DOT SHIPPING DESCRIPTION OR GENERIC SHIPPING NAME Haz Waste Solid, n.o.s., UN3077

WASTE DESCRIPTION	CONT. TYPE	WEIGHT/VOLUME	RCRA WASTE CODES	STATE CODE	TREATMENT STD. INCIN.	TREATMENT STD. OTHER	COMMENTS
Waste Automotive Grease							
w/lead (0.25%) in 20 ga	1G	1/100P	D008	352			
Steel Drum							
			4 Drums				
TOTAL WEIGHT ☒ NET ☐ GROSS 100P				APPLY	BARCODE	HERE	

TREATMENT STANDARDS: If Appendix IV/V Lab Pack check INCIN, other — add specific technology or CCWE, CCW

CMP-50-305 Rev. 4/93

CHEMPAK DRUM INVENTORY SHEET

Non-Radioactive Non-Dioxin Non-Explosive

CUSTOMER SITE: Kaiser

Page 1 of 1

Stream # OP-16385-30

Drum # KRE-B77-724-93

Date: 10/7/93

WASTE TYPE:
- ☐ Appendix IV/V LP
- ☐ Non-Appendix LP
- ☐ Aerosols
- ☐ Bulk/Specification

☐ PIH Haz. Zone:

PIH Description:

☒ Packing Group: III

Chemist/Technician: CH/MB

OSHA Carcinogen: ☐ YES ☒ NO

INFECTIOUS/MEDICAL WASTE: ☐ YES ☒ NO

ASBESTOS: ☐ YES ☒ NO

DRUM TYPE:

☐ 1A1- ☐ 1G- ☐ 1H1-

☒ 55 ☐ 4G- ☐ 1H2-

OTHER:

☐ Div. 2.1	☐ Div. 2.2	☐ Div. 2.3
☐ Class 3	☐ Div. 4.1	☐ Div. 4.2
☐ Div. 4.3	☐ Div. 5.1	☐ Div. 5.2
☐ Div. 6.1	☐ Div. 6.2	☐ Class 8
☒ Class 9	☐ Non-Dot/Non-Reg	

☐ Lab Pack	☒ Bulk	☐ Reactive
☐ Kiln	☐ Blend	☐ DA
☐ T-OX	☐ S&E	☐ LF
☒ Repack	☐ PCB	☐ Aerosol
☐ 3rd Party - LOCATION:		

☐ RQ

DOT SHIPPING DESCRIPTION OR GENERIC SHIPPING NAME: Haz Waste Solid, n.o.s., UN3077

WASTE DESCRIPTION	CONT. TYPE	WEIGHT/VOLUME	RCRA WASTE CODES	STATE CODE	TREATMENT STD. INCIN.	TREATMENT STD. OTHER	COMMENTS
Waste Automotive Fluid							
Lead in SS Steel Drum	M	1-700p	D008	352			
		3 Drums					
TOTAL WEIGHT ☒ NET ☐ GROSS 700p				APPLY	BARCODE	HERE	

TREATMENT STANDARDS: If Appendix IV/V Lab Pack check INCIN, other — add specific technology or CCWE, CCW

CMP-50-305 Rev. 4/93

CHEMPAK DRUM INVENTORY SHEET

Non-Radioactive Non-Dioxin Non-Explosive

CUSTOMER SITE: Kaiser

Page 1 of

Stream # OP-16 385-30 Drum # KRF-B25-> 32-93 Date: 10/7/93	WASTE TYPE: ☐ Appendix IV/V LP ☐ Non-Appendix LP ☐ Aerosols ☒ Bulk/Specification	☐ PIH Haz. Zone: PIH Description: ☒ Packing Group: III	Chemist/Technician CH/MB	OSHA Carcinogen: ☐ YES ☒ NO INFECTIOUS/MEDICAL WASTE: ☐ YES ☒ NO ASBESTOS: ☐ YES ☒ NO

DRUM TYPE:

☐ 1A1- ☐ 1G- ☐ 1H1-

☒ 2- 55 ☐ 4G- ☐ 1H2-

OTHER:

☐ Div. 2.1	☐ Div. 2.2	☐ Div. 2.3
☐ Class 3	☐ Div. 4.1	☐ Div. 4.2
☐ Div. 4.3	☐ Div. 5.1	☐ Div. 5.2
☐ Div. 6.1	☐ Div. 6.2	☐ Class 8
☒ Class 9	☐ Non-Dot/Non-Reg	

☐ Lab Pack	☒ Bulk	☐ Reactive
☐ Kiln	☐ Blend	☐ DA
☐ T-OX	☐ S&E	☐ LF
☒ Repack	☐ PCB	☐ Aerosol
☐ 3rd Party - LOCATION:		

☐ RQ

DOT SHIPPING DESCRIPTION OR GENERIC SHIPPING NAME Haz Waste Solid, nos, UN3077

WASTE DESCRIPTION	CONT. TYPE	WEIGHT/VOLUME	RCRA WASTE CODES	STATE CODE	TREATMENT STD. INCIN.	TREATMENT STD. OTHER	COMMENTS
Dirt contaminated w/ oil	-	1 of 900p	NR				
		8 Drums					
TOTAL WEIGHT ☒ NET ☐ GROSS 900p				APPLY	BARCODE		HERE

TREATMENT STANDARDS: If Appendix IV/V Lab Pack check INCIN, other — add specific technology or CCWE, CCW

CMP-50-305 Rev. 4/93

CHEMPAK DRUM INVENTORY SHEET

Non-Radioactive Non-Dioxin Non-Explosive

CUSTOMER SITE: Kaiser Res

Page 1 of

Stream # OP-16385-46 Drum # KRE-1333-738.93 Date: 10/7/93	WASTE TYPE: ☐ Appendix IV/V LP ☐ Non-Appendix LP ☐ Aerosols ☒ Bulk/Specification	☐ PIH Haz. Zone: PIH Description: ☒ Packing Group: III	Chemist/Technician CH/MB	OSHA Carcinogen: ☐ YES ☒ NO INFECTIOUS/MEDICAL WASTE: ☐ YES ☒ NO ASBESTOS: ☐ YES ☒ NO

DRUM TYPE:

☐ 1A1- ☐ 1G- ☐ 1H1-

☒ 2- 55 ☐ 4G- ☐ 1H2-

OTHER:

☐ Div. 2.1	☐ Div. 2.2	☐ Div. 2.3
☐ Class 3	☐ Div. 4.1	☐ Div. 4.2
☐ Div. 4.3	☐ Div. 5.1	☐ Div. 5.2
☐ Div. 6.1	☐ Div. 6.2	☐ Class 8
☒ Class 9	☐ Non-Dot/Non-Reg	

☐ Lab Pack	☒ Bulk	☐ Reactive
☐ Kiln	☐ Blend	☐ DA
☐ T-OX	☐ S&E	☒ LF
☐ Repack	☐ PCB	☐ Aerosol
☐ 3rd Party - LOCATION:		

☐ RQ

DOT SHIPPING DESCRIPTION OR GENERIC SHIPPING NAME Residue: Cast contained Haz Waste Solid, n.o.s. 9, UN3077, PGIII

WASTE DESCRIPTION	CONT. TYPE	WEIGHT/VOLUME	RCRA WASTE CODES	STATE CODE	TREATMENT STD. INCIN.	TREATMENT STD. OTHER	COMMENTS
NT Drum Cavity Gel Freeze	M	1+25p	NP	512			
		6 Drums					
TOTAL WEIGHT ☒ NET ☐ GROSS 25p				APPLY	BARCODE		HERE

TREATMENT STANDARDS: If Appendix IV/V Lab Pack check INCIN, other — add specific technology or CCWE, CCW

CMP-50-305 Rev. 4/93

CHEMPAK DRUM INVENTORY SHEET

Non-Radioactive Non-Dioxin Non-Explosive

CUSTOMER SITE: Kaiser

Stream # OP-16385-02

Drum # KRE-L39-241-93

Date: 10/7/93

WASTE TYPE:
- [x] Appendix IV/V LP
- [ ] Non-Appendix LP
- [ ] Aerosols
- [ ] Bulk/Specification

[ ] PIH Haz. Zone:

PIH Description:

[x] Packing Group: III

Chemist/Technician CM 10/13

OSHA Carcinogen: [ ] YES [x] NO

INFECTIOUS/MEDICAL WASTE: [ ] YES [x] NO

ASBESTOS: [ ] YES [x] NO

DRUM TYPE:

[ ] 1A1- [x] 1G- 20 [ ] 1H1-

[ ] ?- [ ] 4G- [ ] 1H2-

OTHER:

[ ] Div. 2.1	[ ] Div. 2.2	[ ] Div. 2.3
[ ] Class 3	[ ] Div. 4.1	[ ] Div. 4.2
[ ] Div. 4.3	[ ] Div. 5.1	[ ] Div. 5.2
[ ] Div. 6.1	[ ] Div. 6.2	[ ] Class 8
[x] Class 9	[ ] Non-Dot/Non-Reg	

[x] Lab Pack	[ ] Bulk	[ ] Reactive
[x] Kiln	[ ] Blend	[ ] DA
[ ] T-OX	[ ] S&E	[ ] LF
[ ] Repack	[ ] PCB	[ ] Aerosol

[ ] 3rd Party - LOCATION:

[ ] RQ

DOT SHIPPING DESCRIPTION OR GENERIC SHIPPING NAME Haz Waste Solid, n.o.s., UN3077

WASTE DESCRIPTION	CONT. TYPE	WEIGHT/VOLUME	RCRA WASTE CODES	STATE CODE	TREATMENT STD. INCIN.	TREATMENT STD. OTHER	COMMENTS
Grease w/Lead (0.2p)	B	1490p	D008	551			
		3 Drums					
TOTAL WEIGHT [x] NET [ ] GROSS 90p				APPLY	BARCODE		HERE

TREATMENT STANDARDS: If Appendix IV/V Lab Pack check INCIN, other — add specific technology or CCWE, CCW

CMP-50-305 Rev. 4/93

CHEMPAK DRUM INVENTORY SHEET

Non-Radioactive Non-Dioxin Non-Explosive

CUSTOMER SITE: Kaiser

Page 1 of

Stream # OP-16385-02 Drum # KRE-L42-93 Date: 10/7/93	WASTE TYPE: ☑ Appendix IV/V LP ☐ Non-Appendix LP ☐ Aerosols ☐ Bulk/Specification	☐ PIH Haz. Zone: PIH Description: ☑ Packing Group: III	Chemist/Technician CH IMB	OSHA Carcinogen: ☐ YES ☑ NO INFECTIOUS/MEDICAL WASTE: ☐ YES ☑ NO ASBESTOS: ☐ YES ☑ NO

DRUM TYPE: ☐ 1A1- ☑ 1G- 20 ☐ 1H1- ☐ 2- ☐ 4G- ☐ 1H2- OTHER:	☐ Div. 2.1 ☐ Div. 2.2 ☐ Div. 2.3 ☐ Class 3 ☐ Div. 4.1 ☐ Div. 4.2 ☐ Div. 4.3 ☐ Div. 5.1 ☐ Div. 5.2 ☐ Div. 6.1 ☐ Div. 6.2 ☐ Class 8 ☑ Class 9 ☐ Non-Dot/Non-Reg	☑ Lab Pack ☐ Bulk ☐ Reactive ☑ Kiln ☐ Blend ☐ DA ☐ T-OX ☐ S&E ☐ LF ☐ Repack ☐ PCB ☐ Aerosol ☐ 3rd Party - LOCATION:	

☐ RQ

DOT SHIPPING DESCRIPTION OR GENERIC SHIPPING NAME Hazardous Waste Solid, n.o.s. UN3077

WASTE DESCRIPTION	CONT. TYPE	WEIGHT/VOLUME	RCRA WASTE CODES	STATE CODE	TREATMENT STD. INCIN.	TREATMENT STD. OTHER	COMMENTS
Debris: rags, gloves,							
coil w/ grease + oil	B	1x40p	D008	551			
w/ lead (0.1p)							
TOTAL WEIGHT ☑ NET ☐ GROSS 40p				APPLY	BARCODE		HERE

TREATMENT STANDARDS: If Appendix IV/V Lab Pack check INCIN, other — add specific technology or CCWE, CCW

CMP-50-306 Rev. 4/93

CHEMPAK DRUM INVENTORY SHEET

Non-Radioactive Non-Dioxin Non-Explosive

CUSTOMER SITE: Kaiser Res

Page 1 of 1

Stream # OF-16385-02 Drum # KRE-L45-93 Date: 10/8/93	WASTE TYPE: ☒ Appendix IV/V LP ☐ Non-Appendix LP ☐ Aerosols ☐ Bulk/Specification	☐ PIH Haz. Zone: PIH Description: ☒ Packing Group: III	Chemist/Technician C11MB	OSHA Carcinogen: ☐ YES ☒ NO INFECTIOUS/MEDICAL WASTE: ☐ YES ☒ NO ASBESTOS: ☐ YES ☒ NO

DRUM TYPE:

☐ 1A1- _____ ☒ 1G- 20 ☐ 1H1- _____

☐ - _____ ☐ 4G- _____ ☐ 1H2- _____

OTHER: _____

☐ Div. 2.1	☐ Div. 2.2	☐ Div. 2.3
☐ Class 3	☐ Div. 4.1	☐ Div. 4.2
☐ Div. 4.3	☐ Div. 5.1	☐ Div. 5.2
☐ Div. 6.1	☐ Div. 6.2	☐ Class 8
☒ Class 9	☐ Non-Dot/Non-Reg	

☒ Lab Pack	☐ Bulk	☐ Reactive
☒ Kiln	☐ Blend	☐ DA
☐ T-OX	☐ S&E	☐ LF
☐ Repack	☐ PCB	☐ Aerosol

☐ 3rd Party - LOCATION: _____

☐ RQ

DOT SHIPPING DESCRIPTION OR GENERIC SHIPPING NAME Haz Waste Liquid, n os, 9, UN3082

WASTE DESCRIPTION	CONT. TYPE	WEIGHT/VOLUME	RCRA WASTE CODES	STATE CODE	TREATMENT STD. INCIN.	TREATMENT STD. OTHER	COMMENTS
Surfactant solution used to Decon equipment with Leaded Grease, (0.05p)	P	1 x 5G	D008	551	✓		
TOTAL WEIGHT ☒ NET ☐ GROSS 50p				APPLY	BARCODE		HERE

TREATMENT STANDARDS: If Appendix IV/V Lab Pack check INCIN, other — add specific technology or CCWE, CCW

CMP-50-305 Rev. 4/93

CHEMPAK DRUM INVENTORY SHEET

CUSTOMER SITE: Kaiser Res.

Non-Radioactive Non-Dioxin Non-Explosive

Page 1 of 1

Stream # OP-16385-02 Drum # KRE-446->49-93 Date: 10/8/93	WASTE TYPE: ☐ Appendix IV/V LP ☒ Non-Appendix LP ☐ Aerosols ☐ Bulk/Specification	☐ PIH Haz. Zone: PIH Description: ☒ Packing Group:	Chemist/Technician CH/MB	OSHA Carcinogen: ☐ YES ☒ NO INFECTIOUS/MEDICAL WASTE: ☐ YES ☒ NO ASBESTOS: ☐ YES ☒ NO

DRUM TYPE:

☐ 1A1- _____ ☒ 1G- 20 ☐ 1H1- _____

☐ [illegible]- _____ ☐ 4G- _____ ☐ 1H2- _____

OTHER: _____

☐ Div. 2.1	☐ Div. 2.2	☐ Div. 2.3	☐ Lab Pack	☐ Bulk	☐ Reactive
☐ Class 3	☐ Div. 4.1	☐ Div. 4.2	☐ Kiln	☐ Blend	☐ DA
☐ Div. 4.3	☐ Div. 5.1	☐ Div. 5.2	☐ T-OX	☐ S&E	☐ LF
☐ Div. 6.1	☐ Div. 6.2	☐ Class 8	☐ Repack	☐ PCB	☐ Aerosol
☐ Class 9	☐ Non-Dot/Non-Reg		☐ 3rd Party - LOCATION: _____		

☐ RQ

DOT SHIPPING DESCRIPTION OR GENERIC SHIPPING NAME Haz Waste Solid. nos, UN3077

WASTE DESCRIPTION	CONT. TYPE	WEIGHT/VOLUME	RCRA WASTE CODES	STATE CODE	TREATMENT STD. INCIN.	TREATMENT STD. OTHER	COMMENTS
Dried Paint/Resin in 1pt->1G metal Cans	M	1x 75p	NR	551	—		
		4 Drums					
TOTAL WEIGHT ☒ NET ☐ GROSS 75p				APPLY	BARCODE		HERE

TREATMENT STANDARDS: If Appendix IV/V Lab Pack check INCIN, other — add specific technology or CCWE, CCW

CMP-50-305 Rev. 4/93

CHEMPAK DRUM INVENTORY SHEET

Non-Radioactive Non-Dioxin Non-Explosive

CUSTOMER SITE: Kaiser Pry

Page 1 of 1

Stream # OP-16385-02 Drum # KRE-L50-751-93 Date: 10/8/93	WASTE TYPE: ☒ Appendix IV/V LP ☐ Non-Appendix LP ☐ Aerosols ☐ Bulk/Specification	☐ PIH Haz. Zone: PIH Description: ☒ Packing Group: II	Chemist/Technician CH/MB	OSHA Carcinogen: ☐ YES ☒ NO INFECTIOUS/MEDICAL WASTE: ☐ YES ☒ NO ASBESTOS: ☐ YES ☒ NO

DRUM TYPE:

☐ 1A1- _____ ☒ 1G- 20 ☐ 1H1- _____

☐ _____ ☐ 4G- _____ ☐ 1H2- _____

OTHER: _____

☐ Div. 2.1	☐ Div. 2.2	☐ Div. 2.3
☒ Class 3	☐ Div. 4.1	☐ Div. 4.2
☐ Div. 4.3	☐ Div. 5.1	☐ Div. 5.2
☐ Div. 6.1	☐ Div. 6.2	☐ Class 8
☐ Class 9	☐ Non-Dot/Non-Reg	

☒ Lab Pack	☐ Bulk	☐ Reactive
☒ Kiln	☐ Blend	☐ DA
☐ T-OX	☐ S&E	☐ LF
☐ Repack	☐ PCB	☐ Aerosol
☐ 3rd Party - LOCATION: _____		

☐ RQ

DOT SHIPPING DESCRIPTION OR GENERIC SHIPPING NAME Waste Flamable Liquid n.os UN1993

WASTE DESCRIPTION	CONT. TYPE	WEIGHT/VOLUME	RCRA WASTE CODES	STATE CODE	TREATMENT STD. INCIN.	TREATMENT STD. OTHER	COMMENTS
Waste Pack Dist	P/M	1x56 (3/5)	D001	551	✓		
Dried paint/resin	M	1x10p	ND				
Drum 51 has 1x2p Trisodium Phosphate			2 Drums				
TOTAL WEIGHT ☐ NET ☐ GROSS 40p				APPLY	BARCODE		HERE

TREATMENT STANDARDS: If Appendix IV/V Lab Pack check INCIN, other — add specific technology or CCWE, CCW

CMP-50-305 Rev. 4/93

CHEMPAK DRUM INVENTORY SHEET

Non-Radioactive Non-Dioxin Non-Explosive

CUSTOMER SITE: Kaiser Pres.

Page 1 of 1

Stream # OP-16385-01 Drum # KRE-B52-43 Date: 10/8/93	WASTE TYPE: ☐ Appendix IV/V LP ☒ Non-Appendix LP ☐ Aerosols ☐ Bulk/Specification	☐ PIH Haz. Zone: PIH Description: ☒ Packing Group: II	Chemist/Technician CH MB	OSHA Carcinogen: ☐ YES ☒ NO INFECTIOUS/MEDICAL WASTE: ☐ YES ☒ NO ASBESTOS: ☐ YES ☒ NO

DRUM TYPE: ☐ 1A1- ____ ☐ 1G- ____ ☐ 1H1- ____ ☒ 2- 55 ☐ 4G- ____ ☐ 1H2- ____ OTHER: ____	☐ Div. 2.1 ☐ Div. 2.2 ☐ Div. 2.3 ☒ Class 3 ☐ Div. 4.1 ☐ Div. 4.2 ☐ Div. 4.3 ☐ Div. 5.1 ☐ Div. 5.2 ☐ Div. 6.1 ☐ Div. 6.2 ☐ Class 8 ☐ Class 9 ☐ Non-Dot/Non-Reg	☒ Lab Pack Fuels ☐ Bulk ☐ Reactive ☐ Kiln ☐ Blend ☐ DA ☐ T-OX ☐ S&E ☐ LF ☐ Repack ☐ PCB ☐ Aerosol ☐ 3rd Party - LOCATION: ____	

☐ RQ

DOT SHIPPING DESCRIPTION OR GENERIC SHIPPING NAME Waste Flamable Liquids, n.o.s, UN1993

WASTE DESCRIPTION	CONT. TYPE	WEIGHT/VOLUME	RCRA WASTE CODES	STATE CODE	TREATMENT STD. INCIN.	TREATMENT STD. OTHER	COMMENTS
Paints/Varnishes/Resins w/Petr Distillates	M	14+14	D001	551			
TOTAL WEIGHT ☒ NET ☐ GROSS 150P				APPLY	BARCODE		HERE

TREATMENT STANDARDS: If Appendix IV/V Lab Pack check INCIN, other — add specific technology or CCWE, CCW

CMP-50-305 Rev. 4/93

CHEMPAK DRUM INVENTORY SHEET

Non-Radioactive Non-Dioxin Non-Explosive

CUSTOMER SITE: Kaiser Pres.

Page 1 of 1

Stream # OP-16385-46 Drum # KRE-B53-93 Date: 10/8/93	WASTE TYPE: ☐ Appendix IV/V LP ☐ Non-Appendix LP ☐ Aerosols ☒ Bulk/Specification	☐ PIH Haz. Zone: PIH Description: ☒ Packing Group: III	Chemist/Technician CHMB	OSHA Carcinogen: ☐ YES ☒ NO INFECTIOUS/MEDICAL WASTE: ☐ YES ☒ NO ASBESTOS: ☐ YES ☒ NO

DRUM TYPE:

☐ 1A1- _____ ☐ 1G- _____ ☐ 1H1- _____

2- 55 ☐ 4G- _____ ☐ 1H2- _____

OTHER: _____

☐ Div. 2.1	☐ Div. 2.2	☐ Div. 2.3
☐ Class 3	☐ Div. 4.1	☐ Div. 4.2
☐ Div. 4.3	☐ Div. 5.1	☐ Div. 5.2
☐ Div. 6.1	☐ Div. 6.2	☐ Class 8
☒ Class 9	☐ Non-Dot/Non-Reg	

☐ Lab Pack	☒ Bulk	☐ Reactive
☐ Kiln	☐ Blend	☐ DA
☐ T-OX	☐ S&E	☒ LF
☐ Repack	☐ PCB	☐ Aerosol
☐ 3rd Party - LOCATION: _____		

☐ RQ

DOT SHIPPING DESCRIPTION OR GENERIC SHIPPING NAME Residue Lost Contained Hazardous Waste Solid, n.o.s. UN3077

WASTE DESCRIPTION	CONT. TYPE	WEIGHT/VOLUME	RCRA WASTE CODES	STATE CODE	TREATMENT STD. INCIN.	TREATMENT STD. OTHER	COMMENTS
MT Drum Lost Contained Greasefoil	M	1725p	NR	5R			
TOTAL WEIGHT ☒ NET ☐ GROSS 75P				APPLY	BARCODE		HERE

TREATMENT STANDARDS: If Appendix IV/V Lab Pack check INCIN, other — add specific technology or CCWE, CCW

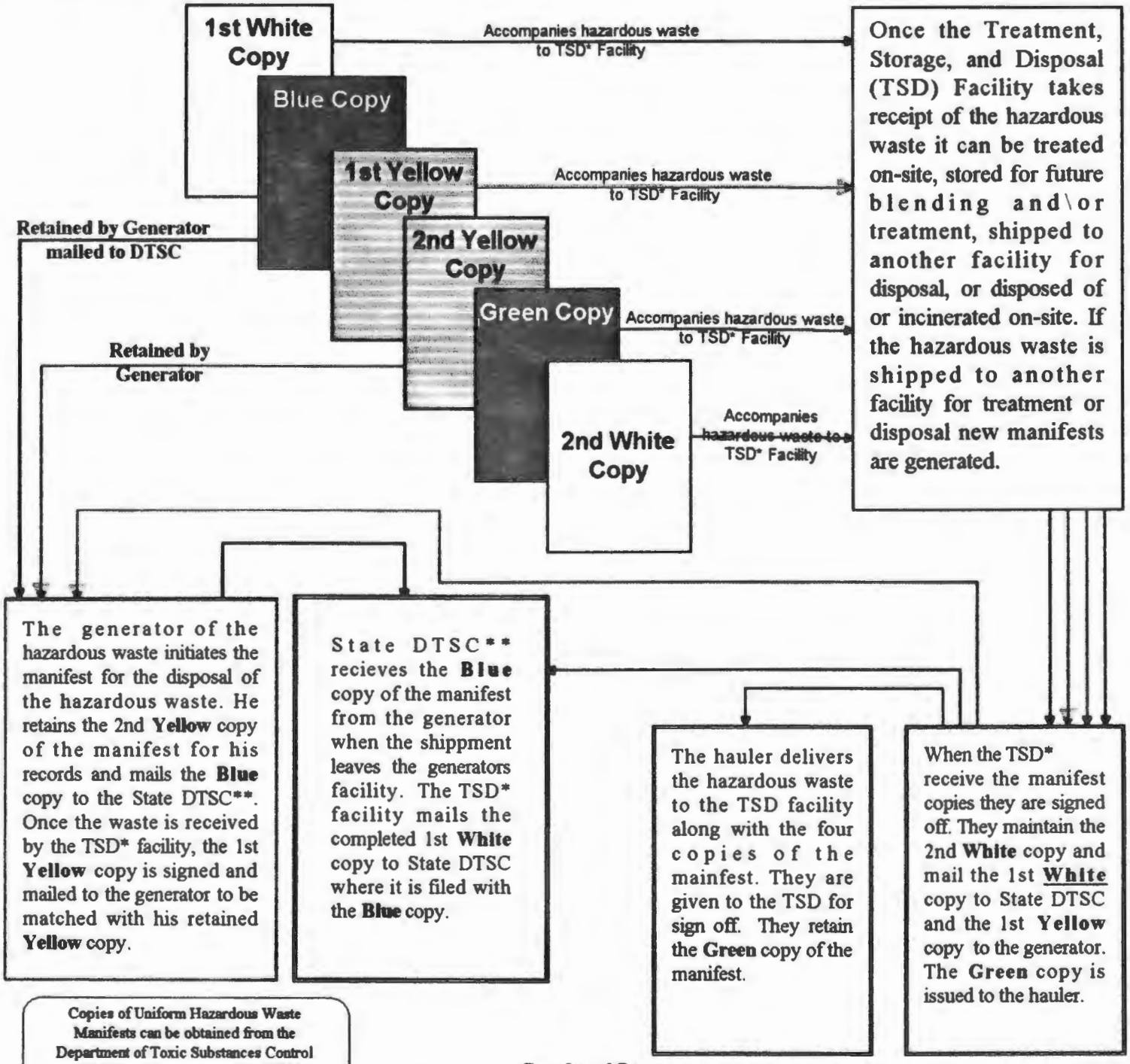
CMP-50-305 Rev. 4/93

ATTACHMENT - 2

Uniform Hazardous Waste Manifest System Overview

The State of California, Environmental Protection Agency utilizes a Uniform Hazardous Waste Manifest System to track loads of hazardous waste from a business or facility, that generates hazardous waste, to its final point of treatment, storage and\or disposal.

The form that is used is Department of Toxic Substances Control (DTSC**) 8022A which consists of six pages of which five of the pages are duplicate copies of the original. Each copy is used as part of the tracking system and must be maintained for inspection purposes by the appropriate intities. The following diagram depicts the paperwork flow.



Copies of Uniform Hazardous Waste Manifests can be obtained from the Department of Toxic Substances Control 400 P Street, Sacramento, CA 95814

Developed By
The County of Riverside-Health Services Agency
Department of Environmental Health
Hazardous Materials Management Division

* TSD = Treatment, Storage and Disposal

** DTSC = Department of Toxic Substances Control

Kaiser Eagle Mtn 4726

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
California Desert District Office
6221 Box Springs Boulevard
Riverside, California 92507-0714

IN REPLY REFER TO:
1703
(CA-063.40)

JAN 13 1994

Ms. Carolyn Douglas
U. S. Environmental Protection Agency - Region 9
Mail Stop H-8-1
75 Hawthorne Street
San Francisco, California 94105-3901

Dear Ms. Douglas:

As per telephone conversation between you and John Key in this office, enclosed for your review is a complete set of documents for the Eagle Mountain Landfill Project Environmental Impact Statement/Environmental Impact Report (EIS/EIR). This EIS/EIR includes information pertaining to the Kaiser Steel Defunct Iron Ore Mine at Eagle Mountain site with your CERCLIS Number: CA00000053090, and our Federal Facilities Identification Number: CA1411D0041. To facilitate your review, we have also enclosed copies of recent correspondence, newspaper articles, and information pertaining to the site.

Very little of the proposed Eagle Mountain Landfill site includes federal public land; most of the affected areas are lands that were patented to Kaiser Steel Resources under provisions of the 1872 Mining Law and under Private Law 790 passed by the United States Congress on July 5, 1952. An exchange of public land affected by the project has been initiated and is currently under appeal to the Interior Board of Land Appeals (IBLA) in Arlington, Virginia. We have also included a copy of the Level I Contaminant Surveys for the selected public lands and the private offered lands.

Currently, we are participating in a joint investigation with the California Environmental Protection Agency's Department of Toxic Substances Control and the Riverside County Department of Environmental Health into allegations of illegal hazardous waste disposal on-site as documented in the enclosed newspaper articles.

If you have any questions concerning these documents, please feel free to contact John Key, California Desert District Hazardous Materials Program Coordinator at either this office or by telephoning (909) 697-5370.

Sincerely,

Alan Stein

Henri R. Bisson
District Manager

Enclosures:

1a. Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the Proposed Eagle Mountain Landfill Project, July 1991.

1b. Appendixes to the Draft EIS/EIR for the Proposed Eagle Mountain Landfill Project, Volume I of II, July 1991.

1c. Appendixes to the Draft EIS/EIR for the Proposed Eagle Mountain Landfill Project, Volume II of II, July 1991.

1d. Final EIS/EIR for the Proposed Eagle Mountain Landfill Project, Volume I of III, June 1992.

1e. Final EIS/EIR for the Proposed Eagle Mountain Landfill Project - Public Comments, Volume II of III, June 1992.

1f. Final EIS/EIR for the Proposed Eagle Mountain Landfill Project Appendixes Volume III of III, June 1992.

2. Record of Decision on the Eagle Mountain Landfill Project, Riverside County, California on Land Exchange CACA-30070 and Right-of-Way Grants CACA-25594 and CACA-31926, dated October 1993.

3. Level I Contamination Survey Checklist of Proposed Real Estate Acquisitions and Disposals - Eagle Mountain, February 1992.

4. Letter from Donna and Larry Charpied to Gerald Fawcett (Kaiser Resources Inc.), dated November 6, 1993.

5. Letter from Kaiser Resources Inc. (Gerald Fawcett) to Mr. and Mrs. Larry Charpied, dated November 16, 1993.

6. Letter from Kaiser Resources Inc. (Gerald A. Fawcett) to Henri Bisson (District Manager, California Desert District, U. S. Bureau of Land Management), dated November 18, 1993.

7. Selected newspaper clippings.

cc: CA-066 w/o enclosures
CA-932.7 w/o enclosures
SC-212B (Rhio Jackson/Tom Olson) w/o enclosures
Sharyl Walker, Best, Best and Krieger (Representing Mine Reclamation Corporation), P.O. Box 2710, Palm Springs, CA 92263 w/o enclosures
James E. Good, Gresham, Varner, Savage, Nolan and Tilden (Representing Kaiser Resources Incorporated), 600 N. Arrowhead Avenue, Suite 300, San Bernardino, CA 92401 w/o enclosures

KAISER RESO[illegible]ES INC.

GERA[illegible] FAWCETT
Execu[illegible]ce President

Corporate Headquarters
8300 Utica Avenue, Suite [illegible]
Post Office Box 2249
Rancho Cucamonga, CA 9[illegible]
909 944-4162
909 944-4158 fax

RECEIVED
BUREAU OF LAND MANAGEMENT
93 NOV 23 PM 12:19
[illegible] DISTRICT
RIVERSIDE, CA.

ROUTING		
TO	DATE	
DM 1	9/24/93	
ADM		
SA-W.M.		
SA-SCAG		
DSR		
P&EA		
PA		
ADMIN		
OPS 3		
L&RR 4		
MIN		
AMS		
ACTION RETURN	BY TO	CENTRAL FILES

November 18, 1993

Mr. Henri Bisson
Regional Director
Bureau of Land Management
California Desert District Office
6221 Box Springs Blvd.
Riverside, CA 92507-0714

Dear Mr. Bisson:

Enclosed for your information is the checkoff worksheet for a recent inspection of the Eagle Mountain mine site conducted by the Riverside County Department of Environmental Health. The inspection included a 3-1/2 hour tour of the facility and a detailed review of our records.

The physical inspection resulted in no report of any adverse conditions and complete compliance for our entire hazardous material handling program.

Please call me at (909) 944-4162 if you have any questions.

Sincerely,

Gerry Fawcett

Gerald A. Fawcett

GAF/lkr:gaf163

CC: Ms. Julia Dugan, Area Manager
Bureau of Land Management

Riverside County Department of Health
Hazardous Materials Branch
Hazardous Materials Handlers Inspection Report

Facility Name [illegible] Date [illegible]

Address [illegible] Permit # 83274

[illegible]

Telephone [illegible] Contact Person [illegible]

	Y	N	N/A
I. Business Information (HSC 25509.a7)			
A. 24 hour contact.	☒	☐	☐
II. Chemical Inventory Disclosure (HSC 25509.3)			
A. Inventory up to date.	☒	☐	☐
III. Emergency Response Plans and Procedures (HSC 25504.b)			
A. Notification of local emergency agencies.	☒	☐	☐
B. Mitigation measures for releases.	☒	☐	☐
C. Evacuation plans with routes.	☒	☐	☐
D. Site map showing surrounding area. (651.6B)	☒	☐	☐
E. Facility map showing location of chemicals.(651.6B)	☒	☐	☐
IV. Documented Employee Training (HSC 25504.3C)			
A. Emergency procedures.	☒	☐	☐
B. Characteristics and hazards of materials.	☒	☐	☐
C. Recognize conditions that leads to releases.	☒	☐	☐
D. Proper use of emergency equipment.	☒	☐	☐
V. Posting (ORD. 651.4H)			
A. Exits posted.	☒	☐	☐
B. Emergency numbers posted.	☒	☐	☐
C. Hazardous Materials storage area posted.	☒	☐	☐
D. Handling areas secure.	☒	☐	☐
E. Emergency equipment storage posted.	☒	☐	☐
F. Pesticide storage area posted.	☐	☐	☒
VI. Other _____	☐	☐	☒

Comments: _____

Inspector [signature] Received By [signature]
Title DIRECTOR, EAGLE MTN Oper.

Riverside Office
4065 County Circle Drive
Riverside, CA 92513
(714) [illegible]

Indio Office
46209 Oasis Room 203
Indio, CA 92201

unty of Riverside Health Services Agen
Department of Environmental Health
Hazardous Materials Management Division

Hazardous Waste Generator Inspection Report

Facility Name: [illegible] Date: [illegible]
Street Address: [illegible] Number of Employees: [illegible]
City: [illegible] Zip Code: [illegible] Inspection Type: [illegible]
Business Contact: [illegible] Business Phone #: [illegible] Reinspection Date:

Health & Safety Code Chapter 6.5 | California Code of Regulations, Title 22 | Riverside County Ordinance 615

Yes	No	N/A	Items marked "No" are violations of the above referenced codes and must be corrected as follows:
			I. Hazardous Waste Storage
X			A. Accumulation Time
X			B. Incompatibles Segregated
			C. Containers
X			1. Compatible with Waste
X			2. Labeled Properly
X			3. Inspected Weekly
X			4. Good Condition
X			5. Stored Closed
X			6. Ingnitables or Reactives 50 ft. from Property Line
X			D. Assessment of Tank Systems
			II. Preparedness & Prevention
X			A. Maintained & Operated to Minimize the Possibility of Fire, Explosion, or Release
X			B. Communication or Alarm System
X			C. Fire, Spill & Decontamination Equipment
X			D. Testing & Maintenance of Emergency Equipment
X			E. Aisle Space
			III. Records
X			A. Permit # 8274
X			B. EPA ID # CAD028924890
X			C. Manifest Available for 3 Years
X			D. Training Records Maintained
X			E. Waste Analysis Records
X			F. Copy of Biennial Report
			IV. Transportation & Disposal
X			A. Registered Hauler
X			B. Manifest Procedures
X			C. Disposed/Treated at an Authorized Location
		X	D. Extremely Hazardous Waste Permit
			V. Contingency Plan
X			A. Emergency Response Procedures
X			B. Arrangement with Local Authorities
X			C. Emergency Equipment Inventoried
X			D. Evacuation Plan
X			E. Emergency Coordinators Listed
			VI. Other
X			A. Above Ground Storage Tank Number of Tanks:
		X	B. PBR \ TTU

Specialist: [signature]

Hazardous Materials Management Division
4065 County Circle Drive, P.O. Box 7600 (HEH)
Riverside, CA 92513-7600
(714) 358-5055 • FAX (714) 358-5017

Branch Office: BLYTHE
Telephone #: (619) 922-8158

Received by:
Signature: Jeannette Roberts
Print Name: JEANNETTE ROBERTS
Print Title: DIRECTOR, EAGLE MOUNTAIN OPERATIONS

DOH-HEH 022 (New 6/92)

KAISER RESOU ES INC.

November 16, 1993

Hand delivered, original to follow by U.S. Mail

Mr. & Mrs. Larry Charpied
P.O. Box 321
Desert Center, CA 92239

Dear Mr. and Mrs. Charpied:

Thank you for your response to my letter of November 5, 1993. I appreciate the fact that both you and Kaiser have interests in the desert community. I would, however, like to take this opportunity to correct several of the statements included in your response letter.

First, there is no hazardous material in the fine tailings at the site. In 1991, extensive analysis and testing was done on the fine tailings by GeoSyntec Consultants. Contrary to your recent assertions, no beryllium, cadmium or hexavalent chromium was detected in the fine tailings. The naturally occurring inorganic compounds of arsenic, chromium and nickel were detected at levels 50 to 150 times lower than the concentrations established for threshold levels defining hazardous material. Further, data presented by the Federal EPA in 1992 indicates the presence of these compounds at these levels is well within the range of native soils throughout the United States. Simply put, the chemicals and compounds present in the fine tailings are not hazardous materials but rather naturally occurring materials present at varying levels in soil everywhere.

The fine tailings material in the liner system would be separated from any leachate in the landfill by a high density polyethylene geomembrane. Nevertheless, GeoSyntec tested the fine tailings for compatibility with leachate and the analysis showed "the hydraulic conductivity of the fine tailings samples did not vary significantly when the samples were permeated with Class III Landfill Leachate". Leachate generation at the Eagle Mountain Landfill is expected to be negligible because of the climate and the fact that only dry municipal solid waste will be accepted at the landfill. GeoSyntec's complete report was incorporated into the Report of Waste Discharge application submitted to the Regional Water Quality Board in December, 1992. This application is subject to public review and comment.

As reported previously, and confirmed by the Riverside County District Attorney's Office, all of the low-level, radioactive sources, sealed in their own metal containers, were removed from the density gauges used in the Kaiser Steel mining operation and were shipped for proper disposal. The documentation to the State Department of Health Services (DHS), the shipping manifests, the material receipts, plus a review by an independent consultant verified that all radioactive sources were shipped in their sealed metal containers to U.S. Ecology for proper disposal. All licensing, transport, disposal and related documentation is under the jurisdiction of the State Department of Health Services, Radiological Division, not the County DEHS. Riverside County Department of Environmental Health was not involved in the 1984 disposal nor did they have any involvement in the State's required documentation.

With regard to Kaiser's reuse, or disposal of hazardous materials, I would only restate that all of these ongoing activities are performed in accordance with state and federal regulations. Documentation of these activities is filed with the State Department of Toxic Control and made available to the Riverside County Department of Environmental Health. Information that is properly filed with public agencies is thus available to the public. In fact, you have used the established public system many times to obtain information from these properly prepared manifest reports. I believe this is further verification that Kaiser is working within the system and the materials are being properly disposed of, off-site.

The recent BLM Level One Environmental Assessment concluded there was no recorded information or evidence that any hazardous substance was improperly stored or released on the property. This finding is consistent with the findings of other public agencies who have inspected the property.

You have attributed statements allegedly made in 1989 regarding the underground tunnels at the site to former Kaiser employee, Mr. Orlo Anderson, who supposedly said he was installing lights in the underground tunnels so Kaiser could receive hazardous waste. I discussed these charges with Mr. Anderson and he stated they were totally false. He also reminded me there are no lights in the tunnels. When you first raised this issue in 1992,

the tunnels were thoroughly inspected by SCS Engineers and no wastes of any kind, hazardous or otherwise, were found in the tunnels.

The "school well" (and "choliform" you believe is present) mentioned in your letter was drilled by the School District in 1985-86. However, it was only used by the school for a few months because of the pumping expense. The school discontinued use of that well and returned to the Kaiser well system in 1986 and has been on that system consistently ever since. Kaiser treats and tests this water on a regular basis and the County DEHS reviews these results monthly.

On the night of November 4, 1993 you filed a complaint with the Sheriff's office that Kaiser was illegally dumping hazardous waste on the mine site. The Blythe substation sent a deputy sheriff who made a thorough tour of the mine site and concluded in his report that the complaint was unfounded and no further investigation was needed.

Finally, there has been no crushing and mining operation at the mine site. The screening of gravel for potential use on the Cal Trans Project to repave the badly worn Interstate 10 Freeway for 16 miles stretching east from Desert Center has been suspended until the contractor resolves a permit issue for this activity with the County Planning Department

In closing, I hope this letter clarifies your questions regarding operations at the Kaiser mine site. Please contact me if you have further questions on these matters.

Sincerely,

KAISER EAGLE MOUNTAIN, INC.

Gerald A. Fawcett

Gerald A. Fawcett
President

GAF/lkr:gaf162

Mr. Steve Jones
Lake Tamarisk Advisory Board
26251 Parkview Drive
Desert Center, CA 92239

Mickey Truitt, Editor
Tattler
44080 Shadow Way
Desert Center, CA 92239

Mr. Ken Stather
26591 Catalina Way
Desert Center, CA 92239

Mr. Alan Reams
26440 Rice Road
Desert Center, CA 92239

Mr. Gary Bryant, Director
Eagle Mountain Community
Corrections Facility
P.O. Box 96
Desert Center, CA 92239

Dr. Wilson
3380 14th Street
Riverside, CA 92501

Senator Dianne Feinstein
1700 Montgomery Street, #305
San Francisco, CA 94111

Senator Barbara Boxer
1700 Montgomery Street, #240
San Francisco, CA 94111

Secretary of Interior Bruce Babbitt
C Street between 18th and 19th NW
Washington, DC 20240

Mr. Jim Baca, Assistant Secretary
Bureau of Land Management - 5660
18th & C Streets NW
Washington, DC 20240

Mr. Ed Hastey, State Director
Bureau of Land Management
California State Office
2800 Cottage Way
Sacramento, CA 92525-1889

Henri Bisson, Regional Director
Bureau of Land Management
California Desert District Office
6221 Box Springs Blvd.
Riverside, CA 92507-0714

Ms. Julia Dugan, Area Manager
Bureau of Land Management
P.O. Box 2000
Palm Springs, CA 92258-2000

Honorable Bob Buster
Board of Supervisors
County of Riverside
P.O. Box 1359
Riverside, CA 92502-1359

Honorable Melba Dunlap
Board of Supervisors
County of Riverside
P.O. Box 1359
Riverside, CA 92502-1359

Honorable Kay Ceniceros
Board of Supervisors
County of Riverside
P.O. Box 1359
Riverside, CA 92502-1359

Honorable "Corky" Larson
Board of Supervisors
County of Riverside
P.O. Box 1359
Riverside, CA 92502-1359

Honorable Norton Younglove
Board of Supervisors
County of Riverside
P.O. Box 1359
Riverside, CA 92502-1359

Mr. Larry Parrish, CAO
County of Riverside
P.O. Box 1359
Riverside, CA 92502-1359

Mr. Jay Vickers
County Counsel
Law Library Building
3535 10th Street, Suite 300
Riverside, CA 92501-3674

John Fanning, Director
Riverside County Department of Environmental Health Services
1737 Atlanta Avenue, H-5
Riverside, CA 92507

Mr. Phil Hampton
Desert Sun
Box 2734
Palm Springs, CA 92263

Press Enterprise
Marcia McQuern, Editor
3512 14th Street
Riverside, CA 92501

Mr. Ron Fortner
KNWZ Radio Station
P.O. Box 12700
Palm Desert, CA 92255

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, Ca. 94105-3901

November 15, 1993

Henri R. Bisson
District Manager
Bureau of Land Management
California Desert District
6221 Box Springs Blvd.
Riverside, CA 92507

Dear Mr. Bisson:

Re: Kaiser Steel Defunct Iron Ore Mine at Eagle Mountain
EPA ID # CA00000053090

The above-named site has been referred to Region 9 as a potential uncontrolled hazardous waste site. Sufficient information and data regarding the environmental condition at the site are not in our files. However, the available information that we have indicates that the Bureau of Land Management may be the legal owner of the above property. As such I am requesting your assistance to provide EPA with sufficient information for us to complete a site assessment under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 as amended by the Superfund Amendments and Reauthorization Act of 1986 (CERCLA).

As you are aware, it is the responsibility of Federal Facilities to provide such data to the Agency. EPA cannot spend fund money to conduct preliminary assessments and site inspections at Federal Facilities. EPA's responsibility is to review your site assessment reports and determine if the site is eligible for the National Priorities List. If you have generated any reports that characterizes the site and the environmental conditions there, please forward them to the Agency. Additionally, I am enclosing a checklist which identifies the kinds of information that should be made available to our review.

Pursuant to the authority of Section 104 of CERCLA, 42 U.S.C. Section 9604, as amended, you are hereby requested to respond to this Information Request within thirty (30) days of receipt of this letter or to adequately justify such failure to respond.

Should you have any questions pertaining to this matter, please feel free to contact me at (415) 744-2343. You may send your written response to U.S. Environmental Protection Agency Region IX, Attn: Carolyn J. Douglas, Site Evaluation and Grants

Printed on Recycled Paper

Section (H-8-1), 75 Hawthorne Street, San Francisco, CA 94105.

Sincerely,

Carolyn J. Douglas

Carolyn J. Douglas
Regional Federal Facilities
Coordinator for Superfund

Enclosure

P 243 066 712

UNITED STATES POSTAL SERVICE

Receipt for Certified Mail

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to Henri R. Bisson	
Street and No 6221 Box Springs Blvd.	
P.O., State and ZIP Code Riverside, CA 92507	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date	

PS Form 3800, June 1991

ROUTING AND TRANSMITTAL SLIP Date 4/

TO: (Name, office symbol, room number, building, Agency/Post)	Initials	Date
1. Carolyn		
2. TC		
3.		
4.		
5.		

	Action		File		Note and Return
	Approval		For Clearance		Per Conversation
	As Requested		For Correction		Prepare Reply
	Circulate		For Your Information		See Me
	Comment		Investigate		Signature
	Coordination		Justify		

REMARKS

Do you know anything about this site. Pls let me know ASAP so I can get back to Keith.

Jim, Let's do this one
ID Cerdis EAGLE Mt
Iron Ore Mine

Carol

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)	Room No.—Bldg.
	Phone No.

5041-102

OPTIONAL FORM 41 (Rev. 7-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.206

★ U.S. GPO: 1990 — 262-080

MAIL AND ROUTING
SUPERFUND

Date: 8/28

- ☐ Keith Takata, H-1-S
- ☐ Anne Corwin, H-1-S

H - 6	H - 7	H - 8	H - 9
☐ Dave Jones	☐ Nancy Lindsay	☐ Don White	☐ Julie Anderson
☐ Kelly McCarty	☐ Nate Lau	☐ Tom Mix	☐ John Kemmerer
☐ Greg Baker	☐ Dan Opalski	☐ Peter Orth	☐ Jane Diamond
☐ Tom Kremer	☐ Betsy Curnow	☐ Terry Brubaker	☐ Doug Steele
☐ Jeff Rosenbloom	☐ Jim Hanson	☐ Caroline Ireson	

HWMD

- ☐ Jeff Zelikson, **H-1**
- ☐ Laura Yoshii, **H-1W**
- ☐ Kathleen Shimmin, **H-1-2**
- ☐ Bobbie Kahan, **H-1**
- ☐ Diana Young, **H-1-3**
- ☐ Ivania Brown, **H-1A**

Notes:

I would like to respond to this letter promptly. Penny has been a supporter and I would like to be responsive. Please set up a meeting to discuss. Thanks.

"Don't Trash the Desert"

Citizens for the Chuckwalla Valley

P.O. Box 397, Desert Center 92239 (619) 392-4722

MS. CAROLYN DOUGLAS (MAILCODE H - 8 - 1)
SUPERFUND, EPA REGION 9
75 HAWTHORNE STREET
SAN FRANCISCO, CA 94105

NOVEMBER 12, 1993

RE: KAISER STEEL DEFUNCT IRON ORE MINE AT EAGLE MOUNTAIN

Dear Ms. Douglas,

Thank you very much for your telephone call, following receipt of the information sent to Mr. Keith Takata, regarding hazardous materials at the Eagle Mountain mine site, October 25, 1993. As per our telephone conversation of November 10, 1993, please find enclosed, photographs my husband and I took of the area, on November 8, 1993. Each photo is numbered (15 total), with a brief explanation. The photos are of just one area that we were able to gain access too. As I said on the phone, we have maps of several other "suspect" areas.

You had indicated that you will write to California Bureau of Land Management, California Desert District office (Henri Bisson, District Manager), located at Box Springs Blvd., in Riverside, regarding this matter. We would greatly appreciate if you would forward a copy of your correspondence, as well as Henri's reply to your inquiries, to the above address.

We can not emphasize strongly enough, that this material represents a very serious threat to our community, environment, and our precious water supply. Members of our community are greatly concerned that our government is willing to allow the polluters of the proposed Eagle Mountain dump project (Browning-Ferris Industries and Mine Reclamation Corporation), to deposit 20,000 tons of garbage daily, on top of hazardous waste. This will only serve to exacerbate the threats of ground water pollution, and the health and safety of our community.

In closing, thank you for your time, and looking into this situation. We look forward to hearing from you in the near future. If we can be of any further assistance, please do not hesitate contacting us at the above address and phone number.

Respectfully,

Donna Charpied

DONNA CHARPIED, for
THE CITIZENS FOR THE CHUCKWALLA VALLEY

"*Don't Trash the Desert*"

Citizens for the Chuckwalla Valley

P.O. Box 397, Desert Center 92239 (619) 392-4722

CA 0 000 053 090
N of Hwy 10 ~~on~~ 8 mi
ON KAISER RD
DESERT CENTER 92339
Riverside FF

MR. KEITH TAKATA
SUPERFUND, EPA REGION 9
75 HAWTHORNE STREET
SAN FRANCISCO CA 94105

OCTOBER 25, 1993

RE: KAISER STEEL DEFUNCT IRON ORE MINE AT EAGLE MOUNTAIN

Dear Mr. Takata,

We were referred to you, by Mrs. Penny Newman, regarding hazardous substances deposited in and around the former iron ore mine, at Eagle Mountain, California, by Kaiser Steel. We have already gone through all of the "proper channels", from the Riverside County Department of Environmental Health to the County's District Attorney and Grand Jury. We hit the proverbial brick wall every time. There seems to be a concerted effort in Riverside County, to cover up this problem. There is a proposed regional dump for the old mine, that will accept 20,000 tons of garbage a day, for the next 100 years, and it seems avarice is preventing the wheels of justice from turning. The original complaint was made in 1989, when a fire broke out at the site, involving PCB's. Obviously, since that time, we have gathered **much information** that substantiate the allegations. We will not overwhelm you with all of the information at once, and are enclosing information that we think will compel you to further investigate the situation. Please find enclosed :

1. Level - I Contaminant Survey conducted by the California Bureau of Land Management, (BLM). The BLM only plans to have Kaiser sign a waiver of liability to be included in the patent of the lands they are giving the polluters to accommodate the dump. Our community views the hazardous materials as an extreme health threat, and a mere waiver of liability as no remediation.

2. Copy of a letter from Riverside County District Attorney, Grover Trask, regarding a complaint filed alleging that Kaiser Steel improperly disposed of radioactive gauges.

3. Copy of a letter from Donald Bunn, Senior Health Physicist, Radiologic Health Branch. Please note that there was no authorization for unsealed or loose material at the site. Also, the Deputy District Attorney was removed from the case, and sent to Washington DC, after several trips to the area, and Mr. Bunn was never notified, and the DA's office did not assign another Deputy DA to continue the investigation.

4. Copy of a Kaiser memorandum stating the radioactive material was removed from two of the instruments, even though there was no authorization for the instruments to be unsealed.

5. Copy of a news article stating Kaiser has improperly handled radioactive instruments.

As mentioned earlier, we have gathered a great deal of information regarding hazardous materials at the site. Among this information are maps of dump areas, that employees and former employees of Kaiser had drawn for us. The most recent are maps that an employee drew us last August. Riverside County's Environmental Health Department claimed in 1989 that the hazardous materials have been removed, then again in 1992 the same claims were made. We are being charged with "trying to frighten people in an attempt to stop the dump", by the dump's promoters.

We shudder in horror at the thought that Eagle Mountain may already be eligible for the SUPERFUND LIST. Someone needs to scrutinize this situation, have the area cleaned up, and prosecute Kaiser executives, as well as a few key players in Environmental Health. Citizen oversite during this process is imperative. Should it become necessary, I could and would competently testify against the people involved in this cover up.

Thank you for your attention to this matter. You may contact us at the above address and phone number, when you are ready for further information. We look forward to hearing from you. Until then we remain,

Respectfully,

Donna Charpied

Donna Charpied, for
THE CITIZENS FOR THE CHUCKWALLA VALLEY

enc.

P/S Would you please send us a "Petitioner's Guidance for Sole Source Aquifer Designation" ? This will be greatly appreciated thank you.

Acquisition or (Disposal) (Exchange
(Circle One)
Serial CA30070 FD (Public Lands)
CA Office Code CA-066.60

California BLM
Level I Survey
Contaminant Survey Checklist
of Proposed Real Estate Acquisitions and Disposals

INSTRUCTIONS: Check for each category. Explain briefly where something other than "No", "None," or "Not Applicable" is checked. Discuss whether a Level II or III Survey will be recommended. Describe the distance if nearby is checked and whether there is a known potential pathway for contamination on site. Attach a legal description of the real estate property covered by this Survey if several parcels are covered.

A. Background Information

Project Name Eagle Mountain County Riverside State California

Legal Description See "Selected Public Lands" and map attached
Landowner Name Public Lands District CDD RA Palm Springs-South Co.
Date of Survey 9/24-25/92

B. Site Inspection Screen: On-site and nearby	ONSITE	NEARBY	NONE	
1. Dump sites especially with drums, containers (Read labels if possible; do not open or handle! If no labels, note identifying characteristics)	X			*See NOTE
2. Other debris potentially causing problems (e.g. paint cans, industrial waste, mining wastes, etc)	X			
3. Fill material: possible cover for dumps	X			
4. Unusual chemical odors		X		
5. Storage tanks: petroleum products, pesticides, etc.		X		
6. Buildings: chemical storage, equipment repair, solvents, asbestos containing materials	X			
7. Vegetation different from surrounding for no apparent reason, e.g. bare ground			X	
8. "Sterile" or modified water bodies			X	
9. Oil seeps, stained ground, discolored stream banks			X	
10. Oil slicks on water, unusual colors in water			X	
11. Spray operation base: air strip, equipment parking area			X	
12. Machinery repair areas		X		
13. Pipelines; major electrical equipment		X		
14. Oiled or formerly oiled roads	X			
15. Evidence of leakage around electric transmission lines: pole mounted transformers, pad mounted transformers			X	

*NOTE: KAISER IS SIGNING A WAIVER REGARDING ANY POTENTIAL HAZARDS OR HAZARDOUS MATERIALS WHICH IS ATTACHED TO THIS LEVEL I CONTAMINANT SURVEY

C. Record Searches (Coordinate with Realty, title search, others as appropriate).

1. Past uses which might indicate potential problems of site (CIRCLE any that are applicable).

   Manufacturing, service stations, dry cleaning, air strip, pipelines, rail lines, facilities with large electrical transformers or pumping equipment, petroleum production, landfills, scrap metal, auto, or battery recycling, military, labs, wood preserving, agricultural chemicals, other describe: See Note on first page — None *

2. Nearby land uses, especially upstream or upgradient, or that might have had waste to dump at site. Identify: dump/storage — None *

3. Known contaminant sites in vicinity: NPL, state sites, candidate sites (check with EPA; State EPA counterpart). — Yes ___ No X

4. Interviews on past use: owners, neighbors, county agents and any appropriate Federal authorities: Problems? — Yes * No ___

5. Agricultural drainage history: surface, subsurface drains. — Yes ___ No X

D. A Federal agency has notified the Department under section 120(h) of CERCLA (Superfund) of past or current presence of a hazardous substance. Not Applicable ___ — Yes ___ No X

E. A non-Federal entity has documented hazardous materials on or near the site. Not Applicable ___ — Yes ___ No X

F. A Level II study is recommended. — Yes ___ No *
   A Level III study is recommended. — Yes ___ No *

*See Note on first page.

G. Disposal Certification Kaiser Eagle Mountain, Inc. has signed a waiver attached to this report.

The above described lands have been examined in accordance with Section 120(h) of SARA. No evidence or recorded information was found to indicate that any hazardous substance was stored for one year or more or disposed of or released on the property.

Field Personnel

Signed Verla J. Harle Print Name Verla J. Harle

Date 2/9/93 Title Realty Specialist

Area Manager

✓ Concur ____ Do Not Concur 2/10/93 Date

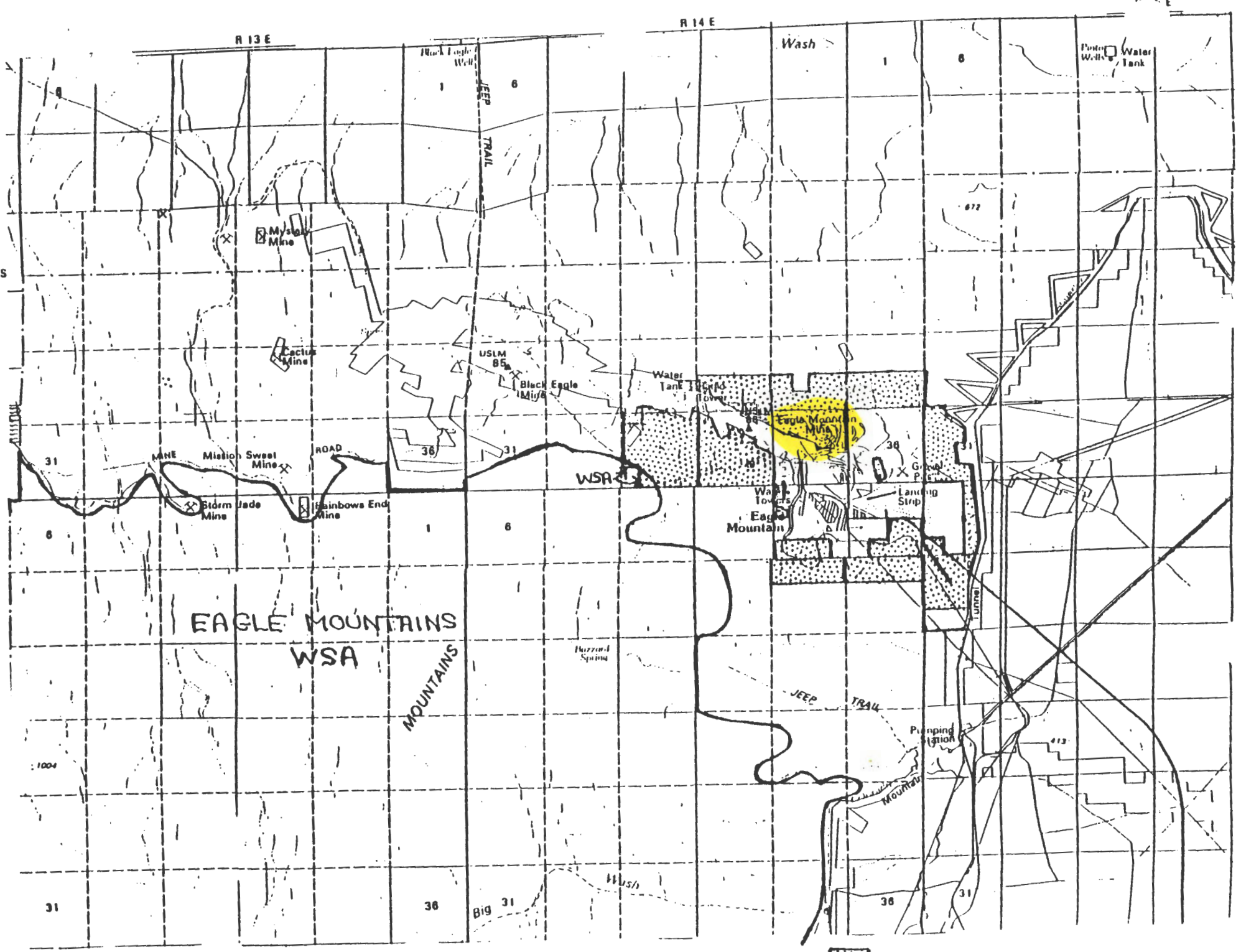
DO Haz Mat Coordinator

✓ Concur ____ Do Not Concur 2/16/93 Date

District Manager

Signed Henri R. Bisson Print Name Henri R. Bisson

Date 2/16/93 Title District Manager



CACA 30070 FD - SELECTED PUBLIC LANDS

Selected Public Lands

All remaining public lands located in:

San Bernardino Meridian
Riverside County, California

T. 3 S., R. 14 E.

Sec. 25:	Lots 5 and 6, SW¼, W½SE¼
Sec. 26:	SW¼, SW¼SE¼, E½SE¼
Sec. 27:	Lots 1 and 2, SE¼, N½SW¼
Sec. 28:	Lot 9
Sec. 33:	Lots 1, 2, 4 and 5, S½NE¼, E½NW¼, E½SW¼, SE¼
Sec. 34:	Lots 1-7, SE¼SE¼, W½SE¼, SW¼
Sec. 35:	Lots 1-4 and 9, NE¼NW¼, N½NE¼
Sec. 36:	Lot 12

T. 3 S., R. 15 E.

Sec. 31:	Lots 5, 10-14, 17-19

T. 4 S., R. 14 E.,

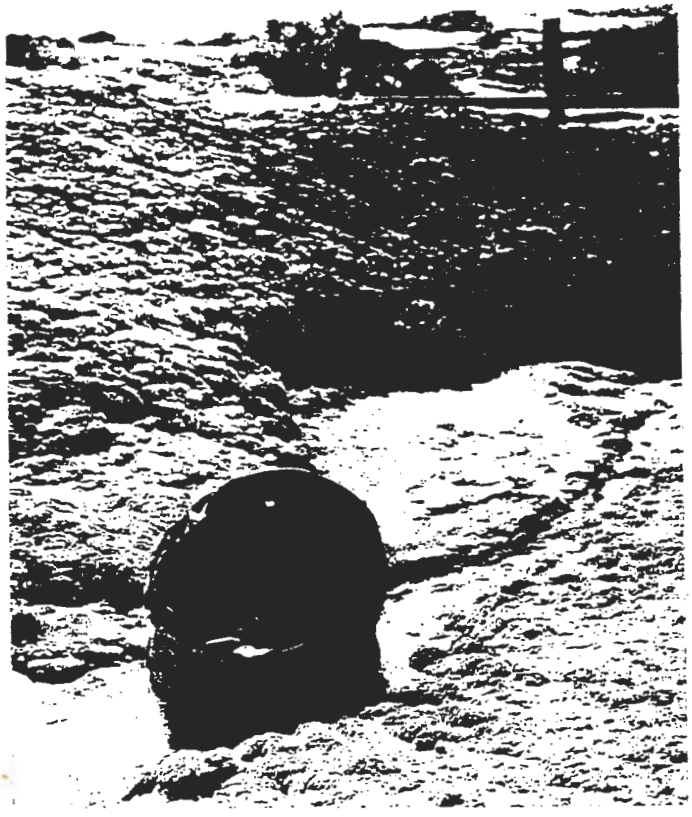
Sec. 1:	Lots 8-11, SW¼SE¼, E½SE¼SW¼, E½NW¼SE¼
Sec. 2:	Lots 7-9, S½SW¼, SW¼SE¼, W½SE¼SE¼
Sec. 11:	Lots 1-4
Sec. 12:	Lots 1-4

T. 4 S., R. 15 E.,

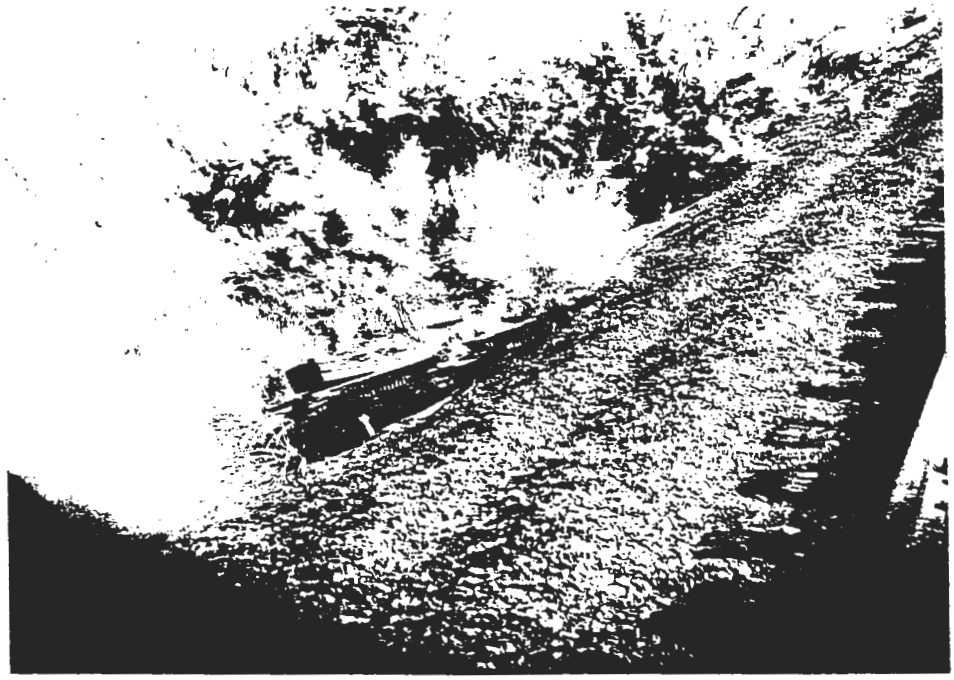
Sec. 6:	Lots 4, 5, 8-11
Sec. 7:	Lots 4-10, 12 and 13

These selected lands total 3,512.47 acres, more or less.

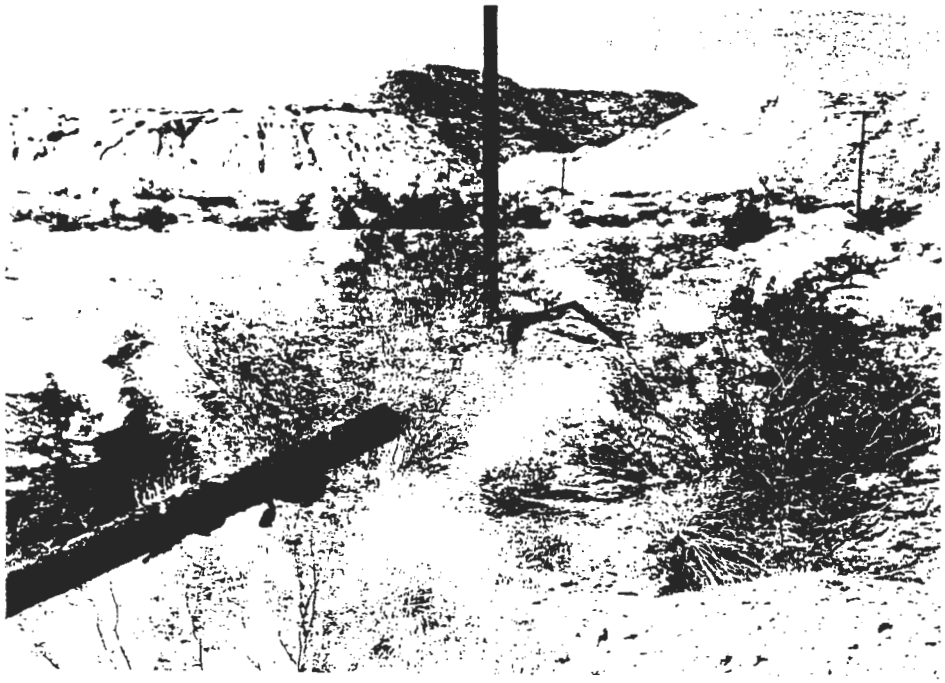
T 3 S., R. 14 E.



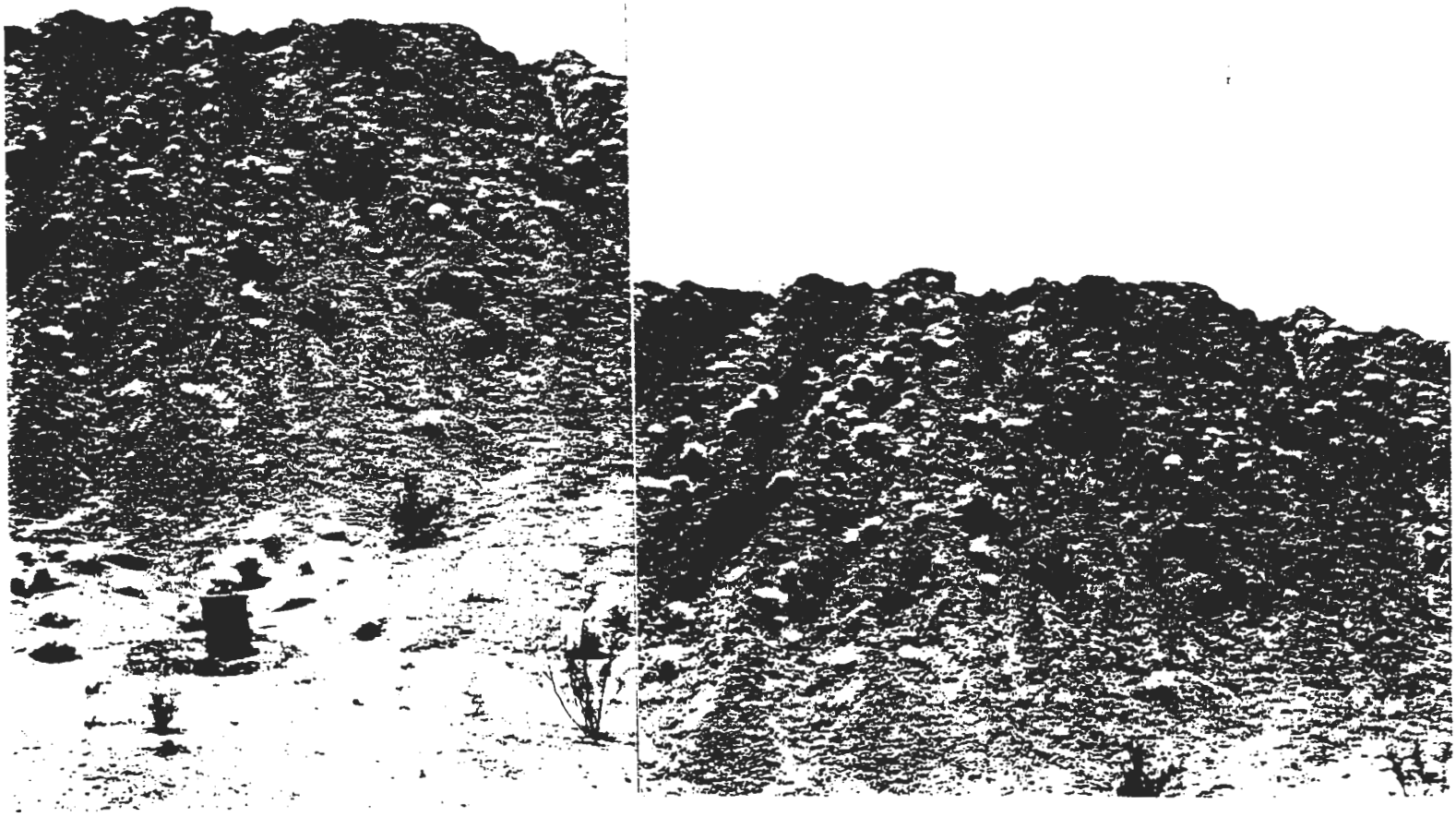
T. 3 S., R. 14 E.



T. 3 S., R. 15 E., SEC. 31



BROKEN WATER PIPELINE

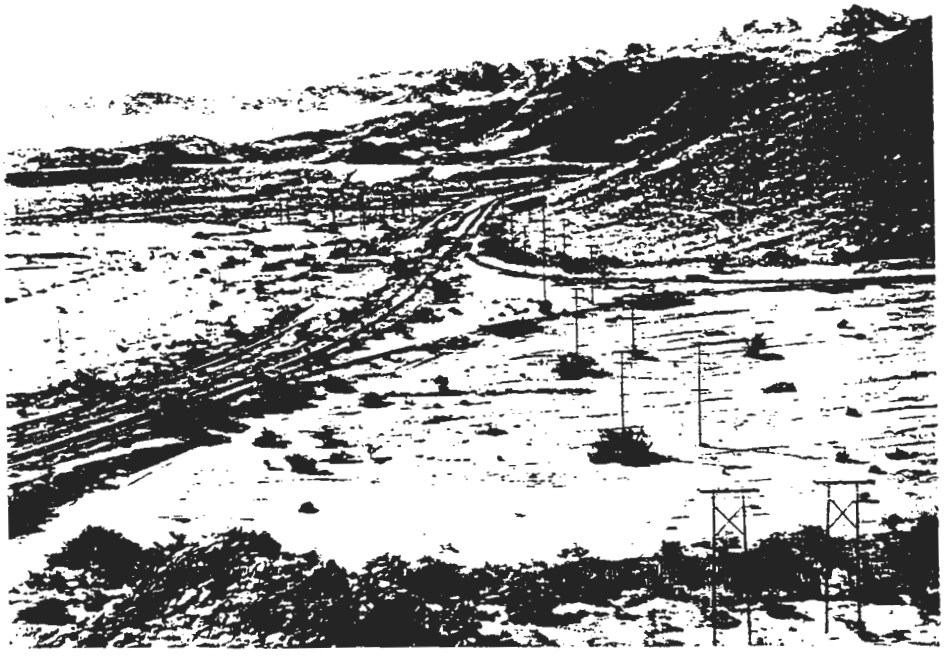


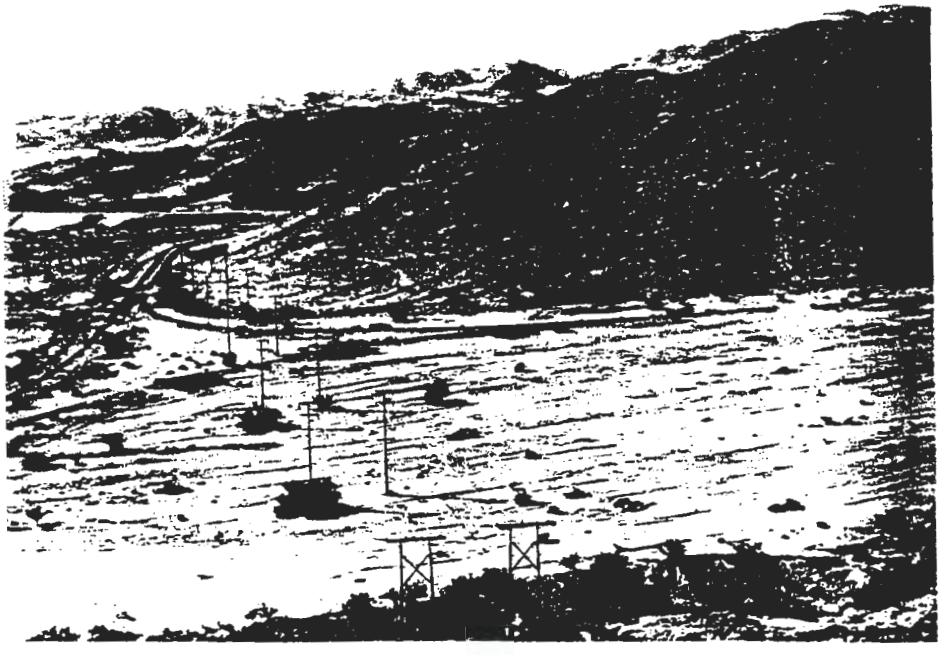
BARREL AND WASTE DISPOSAL ON MOUNTAINSIDE

T. 3 S., R. 15 E., SEC. 31

COVERED BARRELS, NOT EMPTY

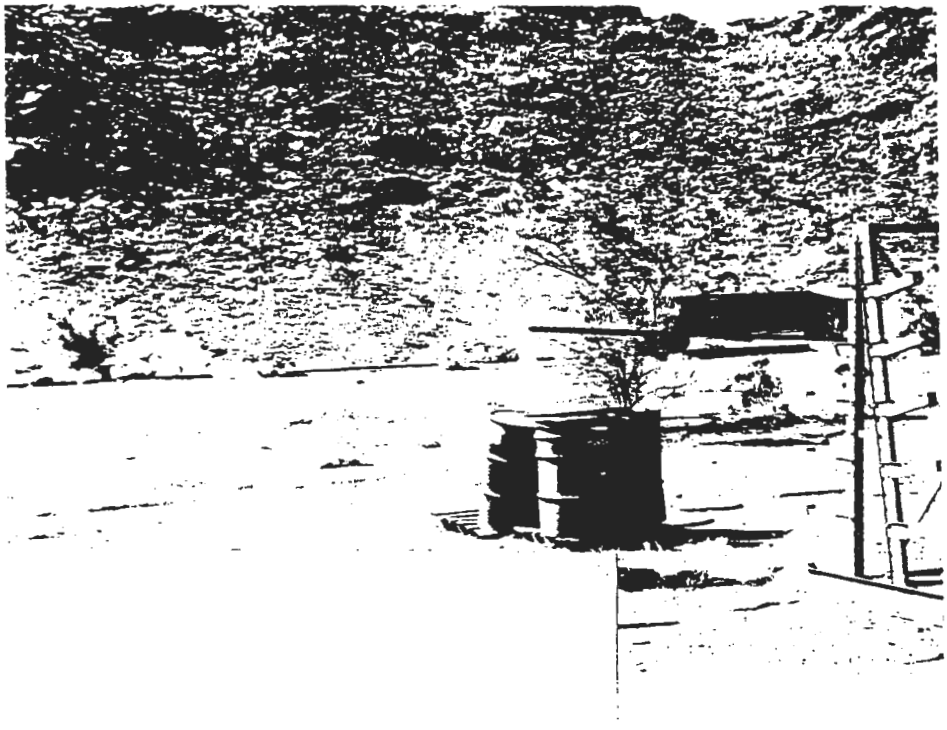
T. 4 S., R. 14 E.

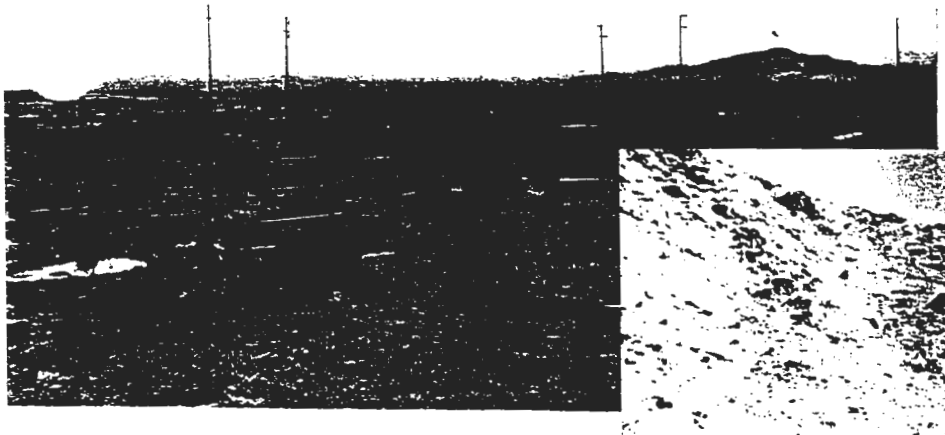


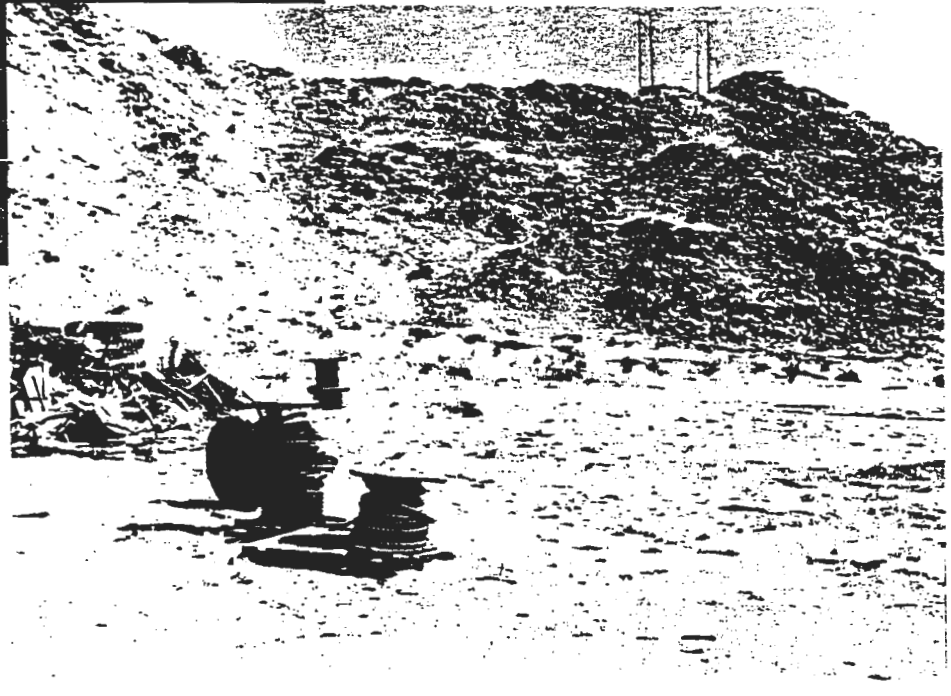


PANORAMIC VIEW OF SEC. 2

T. 4 S., R. 14 E.

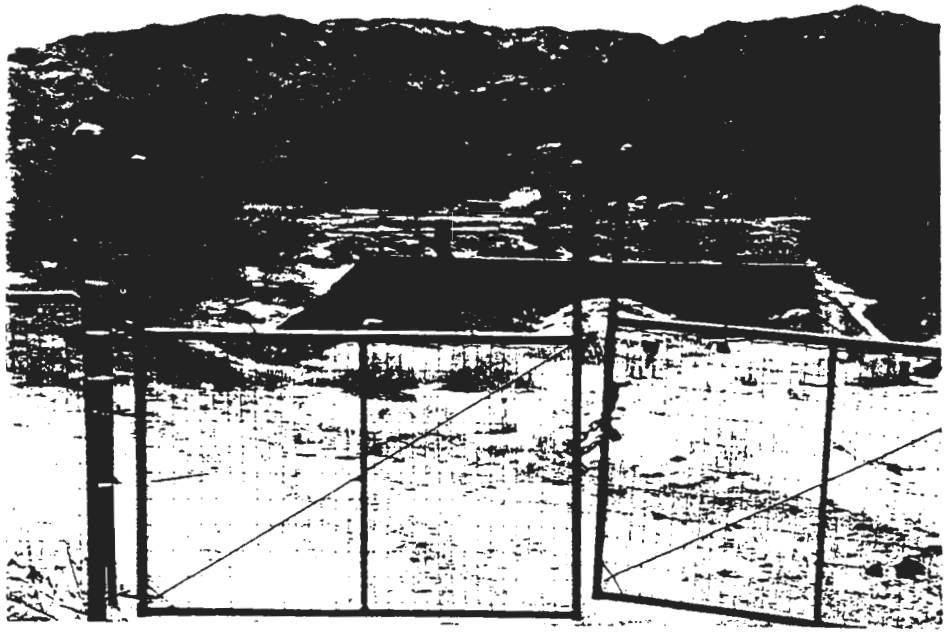




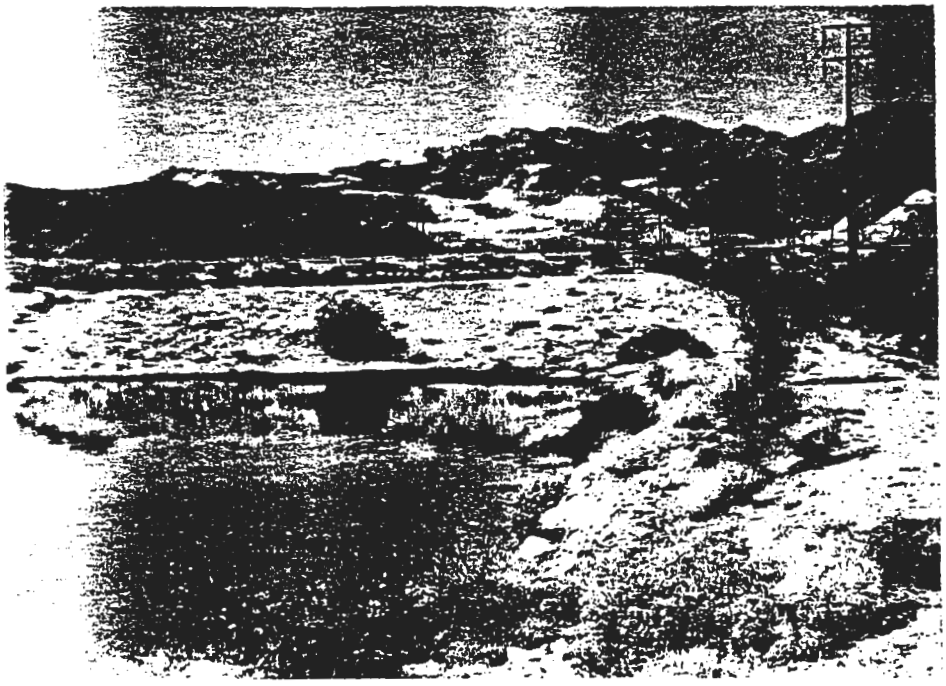


BARRELS OF UNKNOWN MATERIAL, TIRES, RAILROAD SPUR

T. 4 S., R. 14 E., SEC. 11-12

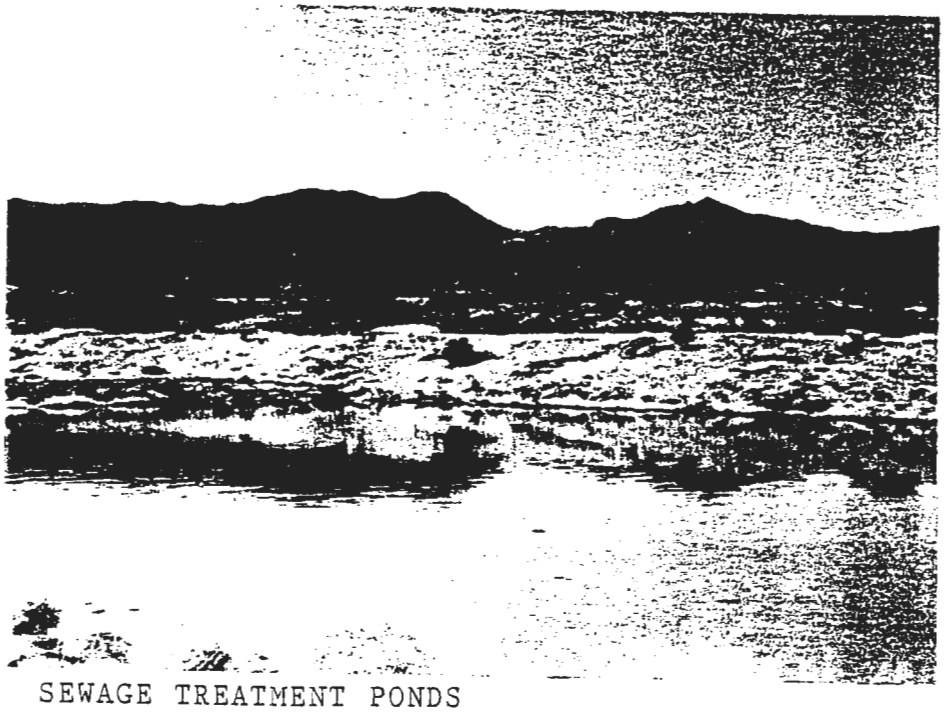


SEWAGE TREATMENT PONDS



SEWAGE TREATMENT PONDS

T. 4 S., R. 14 E., SEC. 11-12



SEWAGE TREATMENT PONDS

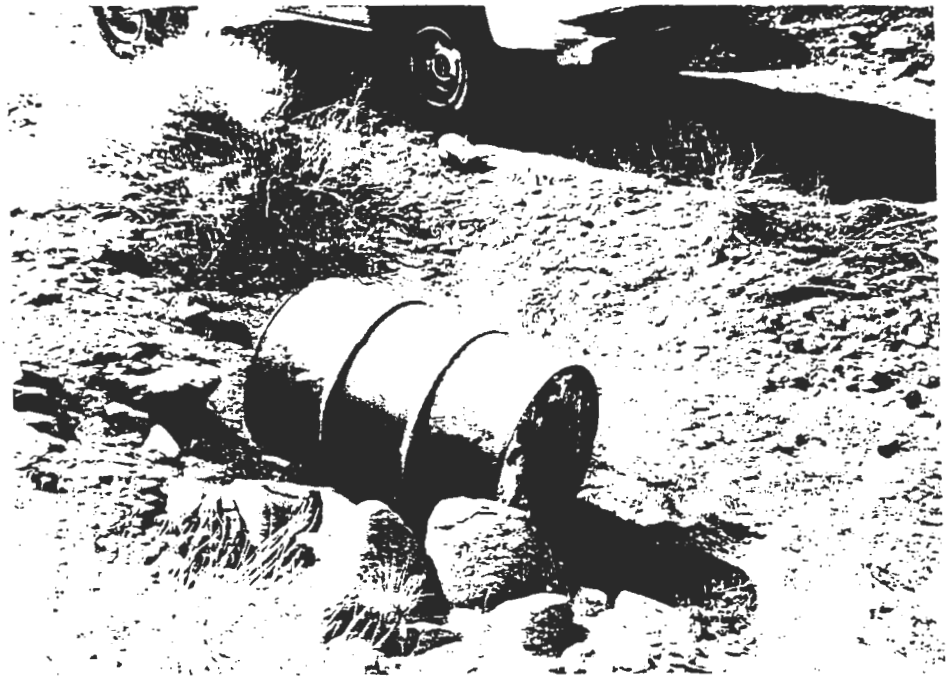
T. 4 S., R. 14 E., SEC. 12

OLD 4-H, SADDLE CLUB AND RODEO GROUNDS

T. 4 S., R. 14 E., SEC. 12

POSSIBLY A DRUG LAB IN SEC. 12 AT ONE TIME

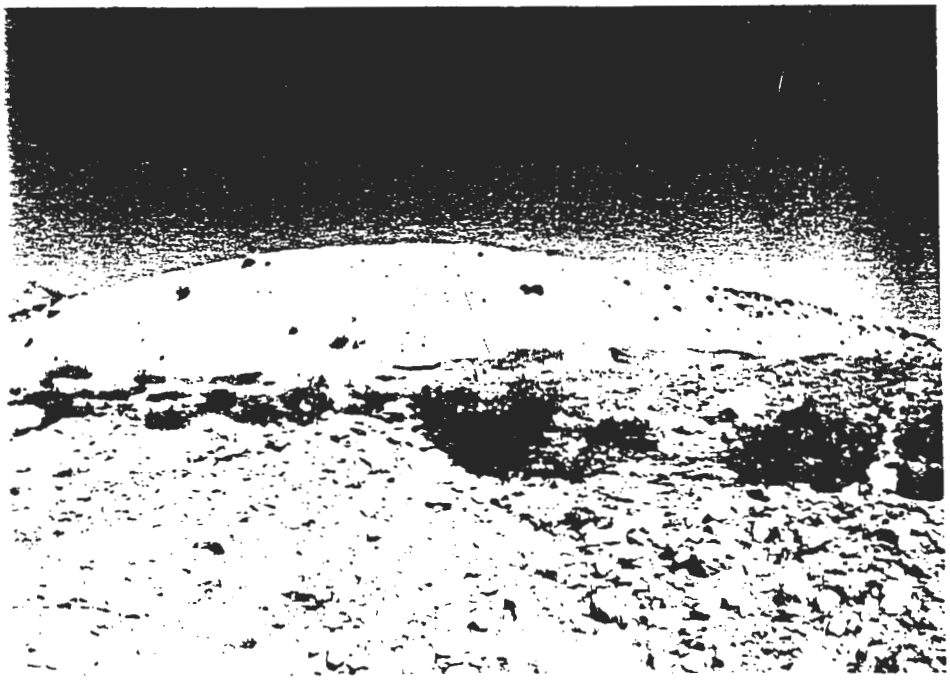
T. 4 S., R. 15 E., SEC. 6



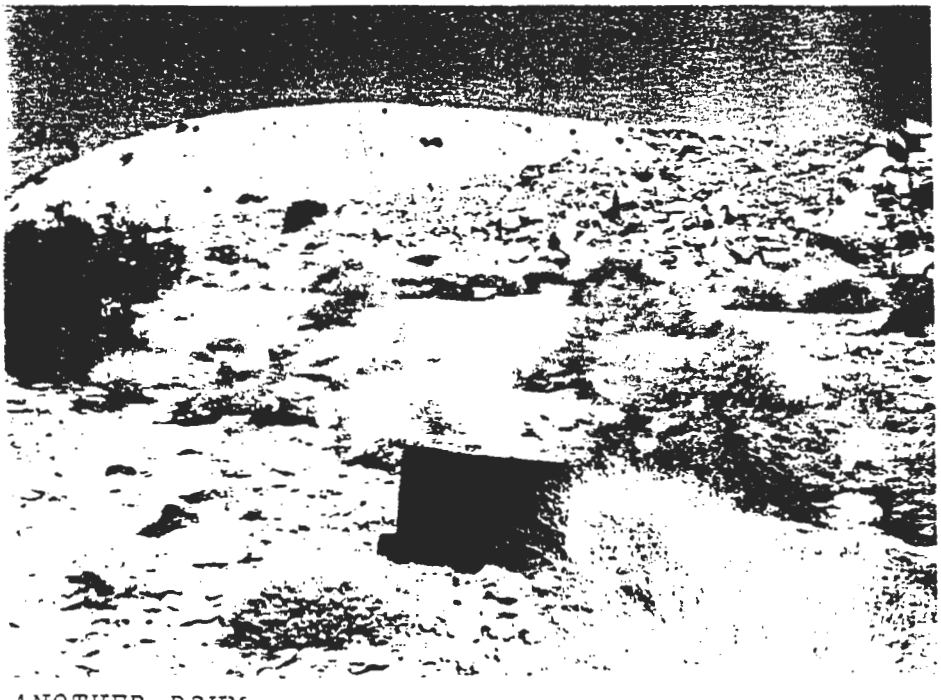
EMPTY DRUM, NO MARKINGS

PIPELINE

T. 4 S., R. 15 E., SEC. 6



MILL TAILINGS WITH PIPE



ANOTHER DRUM

T. 4 S., R. 15 E., SEC. 6

EXPOSED PIPELINE WRAPPER, MATERIAL UNKNOWN

ADDITIONAL BARRELS

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Palm Springs — South Coast Resource Area
63-500 Garnet Avenue
Post Office Box 2000
North Palm Springs, CA 92258-2000

TAKE PRIDE IN AMERICA

IN REPLY REFER TO:

2200
CACA 30070
(CA-066.60)

FEB 10 1993

Mr. Gerald A. Fawcett, President
Kaiser Eagle Mountain, Inc.
8300 Utica Avenue, Suite 301
Rancho Cucamonga, CA 91730

Dear Mr. Fawcett:

It was agreed at our January 19, 1993 meeting that Kaiser Eagle Mountain, Inc. would waive BLM responsibility for any hazardous materials on the selected public lands included in the Eagle Mountain exchange (CACA 30070), and the waiver will be included in the patent issued. We would suggest this waiver:

> "If at any time after the conveyance of this land, any condition on the land covered by this patent is found to be in violation of any Federal, State or local laws or regulations, the Patentee shall immediately take all actions necessary to abate any such violation, and perform all activities required to remediate the site or condition consistent with all applicable Federal, State and local laws and regulations, irrespective of whether the Patentee caused, contributed to, or had actual knowledge of the activities or conditions causing the violation(s). Further, the Patentee shall hold the United States harmless from any liability and expense, including any court costs, attorney's fees or administrative costs, resulting from any such condition or activities. The Patentee's obligations under this provision shall continue in perpetuity."

If you concur, please sign at the bottom of this letter, which will be included with the Level I Contaminant Survey and in the exchange case file, CACA 30070.

Sincerely,

Russell L. Kaldenberg,
Area Manager

KAISER EAGLE MOUNTAIN, INC.

By: Gerald A. Fawcett

Title: EXECUTIVE VICE PRESIDENT

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, Ca. 94105-3901

September 8, 1992

Ed Hastey
California State Director
Bureau of Land Management
Attn: Mr. Russell Kaldenberg, Area Manager
Palm Springs-South Coast R.A.
63-500 Garnet Ave.
P.O. Box 2000
North Palm Springs, CA. 92258-2000

Dear Mr. Hastey:

The Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement/Environmental Impact Report (FEIS/FEIR) for the project entitled **Eagle Mountain Landfill Project, Riverside County, California.** In September 1991 EPA submitted comments on the DRAFT EIS/EIR, rating the project and environmental documentation EO-2 (environmental objections - insufficient information). The following comments are provided pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508) and Section 309 of the Clean Air Act.

Mine Reclamation Corporation and Kaiser Steel Resources, Inc. propose to develop a Class III nonhazardous solid waste landfill in an unused open pit iron ore mine located at Eagle Mountain in northeastern Riverside County, California. Eagle Mountain is located in the California Desert Conservation Area. Under the Federal Land Policy and Management Act (FLPMA), about 3,271 acres of Bureau of Land Management (BLM) lands surrounding the open pit mine will be transferred to Kaiser Steel Resources, Inc., in exchange for Kaiser lands bordering their Eagle Mountain rail line on the Chuckwalla Bench which has higher quality wildlife habitat. A new FLPMA right-of-way would be issued for the entire length of the renovated Eagle Mountain rail line, the existing Eagle Mountain Road, and proposed Eagle Mountain Road Extension.

The landfill itself will comprise 2,272 acres. At full-scale operations, the landfill will accept an inflow of up to 20,000 tons of solid waste per day (tpd) from southern California (primarily from Los Angeles, San Bernardino, Riverside and Orange Counties) for approximately 115 years. 18,000 tpd will be shipped in intermodal transport containers by train (maximum of 6 trains per day, 52-mile rail line) and 2,000 tpd by truck (100 one way trips per day). Refuse will first pass through off-site solid waste processing and transfer stations (materials recovery facilities) which are not considered part of the proposed action.

Printed on Recycled Paper

Mine Reclamation Corporation will establish waste contracts between each transfer station or materials recovery facility.

The landfill is being designed to meet the State standards for a Class II Landfill even though the site will only accept for disposal Class III nonhazardous solid waste. The design of the landfill includes the use of a composite liner on the entire bottom and side slopes of the pit; a leachate collection, recovery and treatment system; and a landfill gas collection system. Measures for dust control, on-site drainage improvements, mitigation and monitoring are included in the project.

EPA commends the project proponents for modification of the proposal to reduce truck trips from 200 to 100 and the commitment to use a composite liner over the complete landfill site. The attention to state-of-the-art design and mitigation measures is noted. Nevertheless, due to the unprecedented size and scope of the proposed project, complex underlying hydrogeological fracture zones, numerous sensitive species, and proximity to Joshua Tree National Monument, we remain very concerned with the potential impacts to water quality, air quality and sensitive natural resources.

Although project proponents are committed to compliance with the new federal landfill regulations contained in 40 CFR 257 and 258 (Resource Conservation and Recovery Act (RCRA) Subtitle D), there is insufficient information for EPA to fully assess the feasibility of full compliance. Of special concern is the ability to adequately monitor groundwater for possible releases of contaminants. Furthermore, we remain concerned with cumulative impacts to air quality, adequacy of the alternatives analysis, detection of hazardous waste, and mitigation for sensitive species. It is our belief that the environmental tradeoffs between out-of-county and in-county landfill options with or without comprehensive waste diversion and minimization programs should be fully explored and evaluated before a decision is made on the proposed Eagle Mountain Landfill project.

We appreciate the opportunity to review this FEIS. Please send a copy of the Record of Decision to this office at the time it is officially released. If you have any questions, please call Jacqueline Wyland, Chief, Office of Federal Activities, (415) 744-1584, or Laura Fujii, of her staff, at (415) 744-1579.

Sincerely,

Jacqueline Wyland

for Deanna Wieman, Director
Office of External Affairs

Enclosure: (5pages)

COMMENTS

SOLID WASTE COMMENTS

As stated in the FEIS, revised requirements for municipal solid waste disposal facilities and practices have been issued under the Resource Conservation and Recovery Act (RCRA), 40 CFR Parts 257 and 258 (Subtitle D). These requirements include location, design, operating, and closure standards which must be met. EPA is reviewing California's solid waste landfill permitting program for compliance with these new Subtitle D criteria. An adequacy determination is planned before the new Federal criteria take effect on October 9, 1993. Approval/disapproval of the State program will affect owner/operators' flexibility to utilize alternatives to the prescriptive standards and compliance schedules mandated by Subtitle D. Flexibility would not exist if the State program is unapproved.

EPA plans to issue partial program approvals. Parts of a State program that do not require regulatory changes to achieve compliance with Subtitle D would be approved. For unapproved parts of a State program, operators will have to ensure strict compliance with the Federal Subtitle D standards and document this compliance in an operating record. Full program approval would be withheld pending necessary regulatory changes.

The record of decision, solid waste permit application, and draft solid waste permit should fully address compliance with Subtitle D with respect to both the approved and unapproved parts of California's municipal solid waste landfill permitting program.

WATER QUALITY COMMENTS

Groundwater Quality

1. EPA recommends a separate groundwater monitoring network be installed and maintained at the boundary of each phase of the waste management unit pursuant to 40 CFR §258.51(a)(2), which becomes effective on October 9, 1993. As described in the FEIS (in response to Region 7, California Regional Water Quality Control Board), the monitoring well network will expand laterally in phases, with each network being abandoned and replaced as the infilling of waste progresses. §258.51(a)(2) states:

> "[t]he downgradient monitoring system must be installed ... at the waste management unit boundary in unapproved

states that ensures detection of groundwater contamination in the uppermost aquifer."

In a state which does not have an approved program **each** waste management unit is required to have a separate groundwater monitoring system (Preamble to 40 CFR Part 257 and Part 258, Subpart E, Groundwater Monitoring and Corrective Action). The lateral expansion of a waste management unit is defined as constituting a waste management unit (40 CFR §258.2). Should California's program not be approved prior to the effective date of 40 CFR part 258, the waste management unit would have to comply with §258.51(a)(2) for unapproved states.

2. Adequate groundwater monitoring is especially critical at the proposed Eagle Mountain Landfill because of the faulted and fractured bedrock which underlies the site and the immense scale of the operation. The DEIS clearly documents the complex bedrock fractures and joints which may form a pathway for groundwater movement (pg. 249 and Appendix C). Some of these fractures are shown to dip from 45 to 80 degrees. In response to concerns regarding these fractures, project proponents propose to place detection wells in the fracture zones since they are most likely to be affected by a release from the waste management unit (pg. 161).

While contaminated groundwater detection **may** be feasible for a single, discrete unit where fracture geometry may be mapped at or near the surface, it would be extremely difficult to project, laterally and vertically, faults and fractures such that they would be intercepted by a groundwater monitoring network installed at an expanded waste unit boundary. If faults or fractures are near-vertical in orientation, the plane of the fracture may not project to the expanded unit boundary. Thus, compliance with the groundwater monitoring requirements of Part 258 may only be feasible by installing less-than-vertically oriented monitoring wells.

The scale of the project (final landfill footprint of approximately four miles) is extremely important in appreciating the difficulty of tracing the fractures to monitor for possible releases of contaminants. The difficulty of scale can be illustrated with a hypothetical case:

> A fracture dipping at 80 degrees is mapped in the initial phase as "most likely to be impacted by a release from a waste management unit." Therefore the fracture is intercepted by a monitoring well at the unit boundary. At a later phase, the boundary expands one mile laterally. In order to monitor the same fracture, a vertically oriented monitoring well would

have to be drilled to 30,000 ft. (depth = tan 80º x 5280 ft).

For additional lateral expansion, it would be necessary to drill even more deeply. Over such great depths, the difficulty of monitoring is further compounded by fracture discontinuity and interception by other fractures.

Because of the above technological and economic constraints, it does not appear that groundwater monitoring can be accomplished by methods described in the EIS. The record of decision, landfill permit application and draft landfill permit should therefore specify how a groundwater monitoring program will be implemented to meet the requirements of 40 CFR Part 258.

2. The feasibility of mitigating or conducting a corrective action program pursuant to 40 CFR §258.58(a)(1) for any release of monitored constituents in the fractured aquifer material should be fully described in the record of decision, permit application, and draft permit.

3. As stated in the FEIS, the monitoring well network of previous phases will be abandoned and replaced as the infilling of waste progresses. The record of decision, permit application, and draft permit should address closure of abandoned wells and the potential for these wells to become conduits for groundwater contamination.

4. Project proponents should also fully evaluate the potential for the mine adit to be a contamination conduit or a risk to the liner integrity.

HAZARDOUS WASTE COMMENTS

1. The proposed project includes temporary storage of recyclable materials (pg. 194) which will be shipped and stored in closed containers labeled as containing recyclables for storage. Given the potential incentives for illegal shipment and storage of hazardous waste, project proponents should address the feasibility of illegal disposal of hazardous waste via use of the storage option for recyclable materials. Describe whether a monitoring and inspection program of the recyclable materials will be implemented.

2. The record of decision, permit application, and draft permit should fully address the treatment of hazardous waste found on the landfill face.

NATIONAL ENVIRONMENTAL POLICY ACT COMMENTS

1. EPA believes non-landfill alternatives and waste diversion/reduced landfill options should have been evaluated in more detail. While additional landfill capacity may be required even with full waste diversion programs, we believe the goal should be a solid waste management and minimization program which minimizes environmental impacts. Smaller, in-county landfills in combination with comprehensive waste diversion and minimization programs may provide viable and potentially less environmentally damaging options.

2. The Los Angeles County Sanitation District describes Towsley Canyon, Blind Canyon and Mission-Rustic-Sullivan Canyons (sites eliminated for detailed evaluation) as potentially viable in-county landfill site options (Comment Document 145, pg. 2). The response to this comment is inconclusive (pg. 368, #1b). Although these sites would still have significant and unmitigatable impacts, they would have less air quality and energy consumption impacts then the proposed project. We urge that a complete evaluation of the environmental tradeoffs between out-of-county and in-county landfill alternatives be made before project approval.

Offsite Facilities

Eagle Mountain Landfill depends on off-site solid waste processing and transfer stations to serve it. While these facilities may be developed by entities other than the project applicants, we continue to believe they are an integral part of the proposed action and should be addressed in more detail. For instance, the FEIS should describe existing stations which may serve the Eagle Mountain Landfill and the probable location of future stations. Address the potential consequences of inadequate transfer stations to serve the landfill. We encourage the project applicants to work closely with local, state, and private entities in the development of future solid waste processing and transfer stations which may serve the landfill.

We also continue to believe the reestablishment of the townsite of Eagle Mountain may be dependent upon the proposed project. Therefore, it would have been preferable for the FEIS to evaluate the townsite of Eagle Mountain and its associated activities rather than defer this evaluation to a later EIR.

AIR QUALITY COMMENTS

The South Coast and Southeast Desert air basins are of major concern because of their critical nonattainment status. While the reduction of truck trips will help reduce potential air quality impacts, we remain concerned with the potential effect of

the project on timely attainment of air quality standards. We believe project proponents should fully satisfy concerns of the air quality planning agencies prior to project approval. We note the concerns and criticisms documented in Assemblyman Steve Clute's Acurex Environmental Corporation report on Eagle Mountain Landfill. These comments should be fully addressed prior to project approval.

GENERAL COMMENTS

1. EPA concurs with the California Department of Fish and Game recommendation that project approval be conditioned upon fish and wildlife issues being fully addressed and resolved to the satisfaction of the responsible resource agencies (Comment Document 0034). We remain concerned with the adequacy of mitigation for sensitive species such as the foxtail cactus. Although these species may only be candidate species and not yet formally listed as endangered, we recommend they be treated conservatively to avoid complications in the event of their being listed during project construction and operation.

2. The record of decision, landfill permit application, and draft landfill permit should address: a) the potential for clogging and failure of the proposed leachate drainage blanket and b) the potential for substantial landfill settlement and the effect of this settlement on other structures such as the adit extension and monitoring wells.

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF RIVERSIDE
4075 MAIN STREET, FIRST FLOOR
RIVERSIDE, CALIFORNIA 92501
714/275-5400

GROVER TRASK
DISTRICT ATTORNEY
RANDALL K. TAGAMI
ASSISTANT DISTRICT ATTORNEY
WESTERN DIVISION
DON R. INSKEEP
ASSISTANT DISTRICT ATTORNEY
ADMINISTRATIVE DIVISION

September 2, 1992

William C. Katzenstein
County Counsel
Law Library Building
3535 10th Street, Suite 300
Riverside, CA 92501-3674

RE: Kaiser Steel Resources, Inc.

Dear Mr. Katzenstein:

In September 1991, the Office of the District Attorney received a complaint that nuclear devices utilized by Kaiser Steel Resources, Inc. were illegally disposed of after the licenses issued by governmental agencies for those devices were terminated. The Special Prosecutions Section of this office, which investigates and prosecutes environmental crimes, conducted a preliminary investigation into the matter to determine if a comprehensive investigation was warranted and feasible.

As background, Kaiser Steel Inc. was issued radioactive material licenses in 1963 to allow the use of gauges for the control of their mining process at the Eagle Mountain Ore Mine in Riverside County. These gauges contained sealed radioactive sources. According to the Department of Health Services, several inspections were conducted over the years by state inspectors while Kaiser Steel was licensed. The licenses were terminated on March 30, 1988.

While the Department of Health Services records indicate that all of the gauges were properly disposed of, the complaint above-mentioned alleged that two gauges were illegally disposed of at the Kaiser facility.

The District Attorney convened the Riverside County Grand Jury to take testimony in this matter on October 18, 1991. Witnesses were interviewed, visits made to the Kaiser facility, and the matter was discussed with the Department of Environmental Health.

It was the conclusion of the Special Prosecutions Section that while the informants were credible, the allegations could not be substantiated.

Unless further evidence is brought forward that would significantly increase the likelihood of a criminal investigation success, this matter shall remain closed.

Testimony taken before the Grand Jury is sealed by operation of law.

Very truly yours,

GROVER C. TRASK II
District Attorney

GCT:bl
cc: Patricia Larson, Chairperson
County Board of Supervisors
John Fanning, Director
Department of Environmental Health
#970

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

PETE WILSON, Governor

DEPARTMENT OF HEALTH SERVICES
714/744 P STREET
P.O. BOX 942732
SACRAMENTO, CA 94234-7320

(916) 323-2756

March 25, 1992

Ms. Donna J. Charpied
P.O. Box 321
45-200 Kaiser Road
Desert Center, CA 92239

Dear Ms. Charpied:

RADIATION SAFETY COMPLAINT RECEIVED SEPTEMBER 30, 1991

Following the receipt of your complaint concerning Kaiser Steel Corporation Eagle Mountain Mine's improper disposal of radioactive gauges, I contacted Riverside County Deputy District Attorney Richard Nixon. A request for investigation form was also completed and transmitted to our Southern California Regional Office, with instructions to coordinate our efforts with Mr. Nixon's office. The allegations raised by your complaint clearly pointed to possible criminal activity on the part of Kaiser Steel Corporation executives, therefore, it was imperative that this Agency assist the District Attorney by providing technical input.

Kaiser Steel Corporation was issued California Radioactive Material License Number 0504-33 on March 12, 1963. The purpose of the license was to allow the use of gauges for the control of their mining processes at the Eagle Mountain Iron Ore Mine, Riverside County, CA. These gauges all contained sealed radioactive material and there was no authorization for unsealed or loose material at the facility. Several inspections were conducted at the mine over the years by State inspectors until the license was terminated on March 30,1988, twenty five years from date of issue.

All documents pertaining to the inventory of gauges possessed under the license were transmitted to Mr. Nixon. I discussed the situation with him several times via phone and I recall his indication that he had made at least two trips to the area to collect evidence. There apparently was some collaboration of the charges you raised that two of their gauges had been disposed of recently, although our records showed all were disposed of prior to the license termination. We supplied Mr. Nixon's office with pictures of the gauges so that he might use them when questioning witnesses.

The type of gauges and their radiation output makes them virtually impossible to detect if their shutter is closed and they are buried in the East Pit area as you indicated. Also, our records show that the materials were properly disposed of when the license was terminated. Unless evidence is presented to the contrary, we have no recourse but to close our investigation at this time. I made several attempts to contact Mr. Nixon via phone recently, however, my messages have gone unanswered.

I will be glad to discuss this situation via phone if you contact me at the phone number above.

Sincerely,

Donald E. Bunn
Senior Health Physicist
Radiologic Health Branch

cc: Richard Nixon, Deputy D.A.
Riverside County District Attorney
4075 Main Street
Riverside, CA 92501

Kim Wong, Regional Manager
RHB-Los Angeles

KAISER STEEL RESOURCES, INC.

MEMORANDUM

TO: Gerry Fawcett **DATE:** September 24, 1991

FROM: Rob Hartman RJH

SUBJECT: Investigation of Equipment at Eagle Mountain

COPIES:

On September 10, 1991, four electronic instruments considered to potentially contain low-level radioactive sources were collected and placed into storage in a locked area of the warehouse at the Eagle Mountain property. One instrument was an Ohmart Model B-0126-HM-8, Serial No. S011721, #5377, the second was a Nuclear Chicago Serial No. 51, DT-A4, and the third was a Ramsey Engineering Company/Texas Nuclear Division (TND), Model 5172, Serial No. B793. The fourth was a Ramsey Engineering Company/Texas Nuclear Division, Model 5172, Serial No. B936.

Observation of the two TND instruments indicated that the instruments were not source holders but were likely detectors which do not contain source material. Radioactive labeling, serial numbers and observation of the Ohmart and Chicago Nuclear instruments indicated that these may have been source holders. However, according to manifests of radioactive material removed from Eagle Mountain in 1984, the sources corresponding to the serial numbers for the Ohmart and Chicago Nuclear gauges had been removed and properly disposed. Manifest dated August 14, 1984, for transport and disposal by U.S. Ecology.

In order to confirm that the four instruments did not contain radioactive sources, Thomas Gray and Associates was contacted to conduct an investigation of the instruments. On September 16, 1991, a technician from Thomas Gray surveyed the instruments with field detection equipment (geiger counter) and established that the instruments did not contain radioactive sources. Leak tests were also conducted on all four instruments to confirm that no source material was present on the instruments. The test results show that no source material is present on any of the four instruments.

Thomas Gray and Associates reported these four instruments may be disposed of as metal debris (i.e., Class 3, non-hazardous landfill) or may be recycled through a scrap recycler.

RJH\32:ef

FRI Sept 27, 1991

THE PRESS-ENTERPRISE

Southern California

Steel company's instrument handling probed

▶ Inquiries are focused on four radioactive gauges used by Kaiser Steel Resources Inc.

By Gary Polakovic
The Press-Enterprise

FONTANA

Kaiser Steel Resources Inc. is under investigation for failure to properly dispose of four radioactive instruments at its former steel mill in Fontana, officials said yesterday

One of the devices was almost melted and mixed with scrap metal after it was accidentally shipped to an Etiwanda steel recycler in October. The device was in a heap of scrap removed from Kaiser property. Radioactive sensors at the Tamco recycling plant alerted workers, who removed the device, thus preventing the material from spreading, officials said.

San Bernardino County District Attorney Dennis Kottmeier said his office is investigating the incident. State health officials and Kaiser executives are conducting inquiries as well.

Kaiser President Dan Larson said the radiation posed a "negligible" risk to human health. "These (devices) are sealed in containers of lead and steel," he said.

The devices were once used to measure the amount of coke in blast furnaces. Kaiser had 30-40 radioactive gauges at the end of the steel-making years in 1983. Most of the gauges were removed by 1987 when the steel mill was being demolished.

Following the discovery of the gauge sent to Tamco, investigators searched and found three more gauges at Kaiser in November. All four were sent back to the manufacturers in March under supervision of the state Department of Health Services.

Each gauge is about the size of a small waste can and contains a marble-sized amount of radioactive material. Two of the instruments contained americium and two contained cesium, Larson said.

The four instruments were apparently overlooked when the others were removed four years ago. "There is no information anybody had any knowledge regarding these materials being improperly disposed of," Larson said.

However, Kottmeier said laws require great care be used when handling the devices.

"Those gauges are strictly controlled. You can't even move them around on the property" without agency oversight, Kottmeier said.

DONNA CHARDIED
PO BOX 397
Desert Center, CA
92239

Fold at line over top of envelope to the right of the return address

CERTIFIED

P 239 043 640

MAIL

U.S. POSTAGE
PAID
DESERT CENTER.CA
92239
NOV 12, '93
AMOUNT

$2.75

00018672-01

UNITED STATES POSTAL SERVICE

0000

RETURN RECEIPT REQUESTED

MS. CAROLYN DOUGLAS (MAIL CODE H-8-1)
SUPERFUND, EPA REGION 9
75 HAWTHORNE STREET
SAN FRANCISCO, CA. 94105

Photos: Please DO NOT BEND

W
S
N
E

#1 Approaching East Boundary of Eagle Mountain mine large tailings ~~pile~~ dump site. This is one of several dump sites that employees have drawn maps to. The entire area needs to be excavated and cleaned with citizen oversight

November 8 1993

#2 Tailings pile dump with debris exposed through erosion.

November 8, 1993

#3 CABLE AND mining DEBRIS
Exposed through EROSION
in tailings pile DUMP.

November 8, 1993

#4
Barrels, METAL, OTHER mining
debris exposed by EROSION
AT TAILINGS pile dump

November 8, 1993

#5 Tailings pile Dump
WITH DEBRIS exposed
through EROSION

November 8, 1993

Neg #7

Tailings pile dump
WITH DEBRIS EXPOSED
THROUGH EROSION

Photo #6
November 8, 1993

#7

Tailings pile dump with
DEBRIS EXPOSED
through EROSION

November 8, 1993

#8

Tailings pile dump with
DEBRIS EXPOSED THROUGH
EROSION

November 8, 1993

#9

BARREL AT FOOT OF TAILINGS PILE DUMP, EXPOSED by EROSION

November 8, 1993

#10

BARREL AT FOOT OF TAILINGS PILE DUMP, EXPOSED BY EROSION

November 8, 1993

#11

NEW GALVANIZED CAN INDICATING RECENT DUMPING ACTIVITIES

November 8, 1993

#12

EXPOSED DRUM AT FOOT OF TAILINGS PILE - contents unknown

November 8, 1993

#14

EXPOSED DUMP SOUTH OF TAILINGS PILE. NOTE NEW AND OLD BARRELS indicate RECENT AS well AS PAST ACTIVITIES

November 8, 1993

#15

EXPOSED DUMP SOUTH OF TAILINGS pile dump. Note BARRELS AND DEBRIS. Another AREA Employees have drawn maps to that warrants EXCAVATION AND cleaning with citizen oversight

November 8, 1993

Neg. # 18

HAZARDOUS MATERIALS PROTECTIVE GEAR EXPOSED BY EROSION AT FOOT OF TAILINGS PILE DUMP

Photo # 13
November 8, 1993

Form 1120-7
(January 1983)

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

PUBLICITY RECORD

Newspaper and Location	Section and Page Number	Date of Publication
The Desert Sun	A-3	9/4/93
Submitting Office		Date sent to WO-130
PALM SPRINGS-SOUTH COAST RESOURCE AREA		

Officials seek more tests for dump site

By PHIL HAMPTON
The Desert Sun

State regulators have ordered additional tests to satisfy concerns that the proposed Eagle Mountain Landfill won't pollute groundwater.

Consultants for the dump's developer, Mine Reclamation Corp. of Palm Springs, are drilling 800-foot-deep wells to help confirm the direction and speed of groundwater flow beneath the site. Such information is important in detecting and containing any contamination that may occur.

Also, Mine Reclamation officials and their consultants are scheduled to meet Sept. 16 in Sacramento with Department of Water Resources engineers. The company has completed additional tests to address the concerns of engineers who have said more evidence is needed to prove the strength of a plastic liner between trash and the ground.

These are the final steps in a staff review of Mine Reclamation's 5,000-page permit application filed with the California Regional Water Quality Control Board in Palm Desert in December, regulators and company officials said.

The water board is scheduled to receive recommendations from its staff and hear a presentation from company officials at a workshop Nov. 17.

It will be the board's first public hearing on the dump proposal. A board decision could take another six months, officials said.

The landfill would be 60 miles east of Indio at an abandoned iron ore mine.

It would remain open for more than 80 years and at peak capacity accept 20,000 tons of trash a day from throughout Southern California, making it the largest dump in the country.

Riverside County supervisors approved landfill plans in October. Mine Reclamation also needs permits from the water board and other regulators.

Bob Perdue, landfill unit chief for the water board, said the additional tests and the involvement of the Department of Water Resources would be unusual for a smaller landfill. But given the scope of Eagle Mountain and its location in the deep pits of the mine, he said, the additional work is routine.

"What we are doing is basically a fatal-flaw analysis," Perdue said. "We are determining if the site can be monitored (for contaminants) and if the site can withstand a large earthquake."

Gary Johnson, Mine Reclamation's vice president of landfill development, agreed with Perdue's characterization.

"They just want to be conservative," Johnson said.

Eagle Mountain opponents are expected to protest landfill plans before the water board.

They have repeatedly criticized the environmental record of Mine Reclamation's principal shareholder, waste management company Browning-Ferris Industries Inc. of Houston. Most recently, Browning-Ferris was cited by state regulators for failing to build ponds that may have prevented pollution of a creek during a rainstorm at its landfill in San Mateo County.

"The point we're trying to make is, these people keep saying, 'Trust me, trust me, we'll do this.' But they keep shirking their responsibility," said Donna Charpied, a leading landfill opponent who farms with her husband on land near Eagle Mountain.

The Desert Sun

WEDNESDAY, November 17, 1993

A8

OPINION

Robert J. Dickey, President & Publisher
Joan Behrmann, Executive Editor
Keith Carter, Editorial Page Editor

OUR VIEW: A landfill solution that can work

■ EAGLE MOUNTAIN: Thanks to stringent standards for approval, the controversial project offers protection for environment while benefiting all county residents

A little more than a year ago, Riverside County supervisors on a 3-2 vote approved one of the most controversial projects in history, the Eagle Mountain Landfill and Recycling Center.

But far from settling the issue, the vote was only the beginning of an exhaustive, time-consuming process that eventually will see the project reviewed by nearly two dozen federal, state, regional and county regulatory agencies.

It also didn't silence the still-vocal opponents of the project, who have taken their grass-roots campaign to block development of the landfill from the hearing rooms to the courtrooms.

Landfill foes earlier this year filed three separate lawsuits in an effort to block the project. Trials are expected to begin in June.

The most significant development in the 13 months since the supervisors' vote was the recent approval by the federal Bureau of Land Management of a land swap crucial for the project. Next hurdle for Mine Reclamation Corp., the Eagle Mountain developer, is the California Regional Water Quality Control Board for the Colorado River Basin. After more than a year of staff work, the board will hear an hourlong presentation from the developer for the first time today.

As the project winds its way through the bureaucratic maze of approvals, one fact is inescapable: MRC has addressed every possible environmental question and complied with every requirement, and then some.

With the unprecedented level of environmental safeguards now built into the project, MRC has raised the standard for every future landfill in the United States.

Based on the mountain of evidence presented during the past three years, we believe it's in the best interests of Coachella Valley residents for this project to proceed.

■■■

If Eagle Mountain itself were some pristine desert wilderness, there might be a greater worry about the long-term effects of a mega-landfill at the site.

But nearly 40 years of gouging millions of tons of iron ore out of the barren hills have left huge, ugly scars on the land. If there is such a thing as an ideal site for a huge regional landfill capable of accepting a century's worth of trash, it would be Eagle Mountain.

Certainly no one wants the California deserts to become a dumping group for someone else's household refuse. But no matter how much recycling efforts reduce the volume, there will always be trash, and it will have to go somewhere.

Eagle Mountain's remote location and its torn and damaged terrain make it a logical location for a regional landfill accepting non-hazardous waste.

It would be naive to assume that there isn't a potential for environmental damage. But the same problems would exist with any landfill. Eagle Mountain's state-of-the-art technology will do more to protect the environment than any similar landfill in the world.

There's a whole list of specific standards imposed that will serve to protect the environment.

They range from installation of extra-thick layers of liner as a special precaution against leakage to a requirement that the water quality board permit be reviewed every five years. If MRC fails to meet its obligations, the permit won't be renewed.

■■■

Consider a different scenario: What happens if Eagle Mountain isn't built?

Killing this project won't change the fact that one of the Coachella Valley's two principal landfills is leaking toxic materials into our underground water supply every day.

The other, at Edom Hill east of Interstate 10, is located virtually on top of the San Andreas Fault. In case of a major rupture, that could spell disaster for much of the valley's long-term water supply.

The cost to the Coachella Valley, both in dollars and in damage to our way of life, will be incalculable if we continue to ignore the ticking time bomb of the Edom Hill and Coachella landfills. Eagle Mountain offers a reasonable alternative that will allow us to stop contaminating our own water supply.

As for direct effects on the Coachella Valley, the truth is most of us won't realize the Eagle Mountain landfill even exists. All truck traffic from outside the valley will be eliminated after the first three years.

Train trips along the Southern Pacific tracks will be strictly limited. There will be little visible evidence of the huge landfill 60 miles east of Indio.

If Eagle Mountain fails, there almost certainly will be similar projects built in San Bernardino or Imperial counties. That means trash-laden trucks and trains still would be traveling through the Coachella Valley, but residents wouldn't share in any of the financial benefits.

■■■

No previous project has gone through such rigorous bureaucratic and public scrutiny. Every possible impact anticipated by regulators has been addressed by the developers.

Ironically, some of those who helped make it feasible are those who fought the project the hardest.

Groups such as the Citizens for the Chuckwalla Valley, the Eagle Mountain Landfill Opposition Coalition and the Desert Protective Fund served an important role in the process. Their concerns pushed MRC to go along with the unprecedented levels of environmental protection that Eagle Mountain will provide.

Without their questions and challenges every step of the way, it's unlikely many of the safeguards would have been adopted.

While handing out credit, we can't forget the job done by Supervisor "Corky" Larson, who bargained hard to get not only the most technologically advanced landfill in existence, but engineered a financial deal that will benefit every Riverside County resident.

County officials estimate they'll receive $4.8 million a year when the dump opens in 1995, and more than $28 million a year during peak operations starting in 2005. And half of that money will go directly toward providing services in the desert area. It will raise millions specifically earmarked for environmental purposes, including acquisition of open space land and monitoring long-term effects of the landfill.

■■■

The Eagle Mountain Landfill project offers the opportunity to improve the environment while at the same time providing a stable source of revenue for the county.

Once MRC complies with all the mandates and restrictions placed on the project, it deserves a green light from the government agencies and commissions reviewing it.

Millions of dollars have been spent on environmental studies for the Eagle Mountain project. Not a single report has ever concluded that the landfill posed such a danger to the environment that it should not be built.

Allegations raised by opponents of vague conspiracies and secret political deals just don't ring true. To the contrary, MRC officials have been open and forthcoming about every aspect of the project. They've tackled even the most sensitive questions about the landfill and its impact head-on.

The gates of the mine site have been opened so concerned residents can get a firsthand look at just what will happen there.

Eagle Mountain is the logical solution for a problem that won't go away.

It's a project the desert — and its future generations — can live with.

*U.S.GPO:1988-573-017/96015

Form 1120–7
(January 1983)

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

PUBLICITY RECORD

Newspaper and Location	Section and Page Number	Date of Publication
The Press-Enterprise	B-1	December 1, 1993
Submitting Office: CDD		Date sent to WO–130

County to check on landfill toxic peril

▶ Foes of the Eagle Mountain landfill believe a previous federal survey did not fully investigate the situation.

By Jack Robinson
The Press-Enterprise

RIVERSIDE

The Eagle Mountain landfill could trap old toxic waste below millions of tons of new trash, poisoning residents and exposing Riverside County to a massive legal threat, opponents of the project told the Board of Supervisors yesterday.

Despite concerns that opponents were only trying a new tack to kill a project that was narrowly approved by the board last year, supervisors agreed to examine the claim. The action has no immediate effect on the project.

"I don't think we can just walk away and not be sure in our own minds there's nothing there," said Supervisor Melba Dunlap, one of two on the five-member board who voted against the project last year.

"What we really see is a move to bring this project back to the board because... we have a change in the board majority," said board chairwoman and project supporter Patricia "Corky" Larson.

Bob Buster, who has been critical of the Eagle Mountain landfill, won election to the board shortly after the vote last year. He replaced project supporter Walt Abraham.

The landfill, which would be the nation's largest, has been the center of a hard-fought battle for years. Mine Reclamation Corp. proposes to ship up to 20,000 tons of trash a day by rail to the former iron ore mine near Desert Center, beginning in 1995.

Backers say the project will bring the county badly needed jobs and revenue. Opponents say it poses enormous environmental and financial risks to the county.

Since winning county approval last October, the landfill has worked its way through other regulatory hurdles. Last month the federal Bureau of Land Management approved a land exchange with the landfill owner that operators said was necessary for the project to succeed. Opponents have vowed to appeal.

Opponents told supervisors last month that hazardous waste dumped in the old pit has not been properly investigated.

In a report to the board yesterday, County Administrative Officer Larry Parrish said the complaints have already been considered. County planning and health officials concluded that the operator's plan for developing the landfill will take care of any waste left behind by others, his report said.

But landfill opponents Larry and Donna Charpied of Desert Center told supervisors the county based this conclusion on a limited federal survey that did not fully investigate the problem.

"We're not satisfied with this," Larry Charpied told the board. "This is a whitewashing memo."

While some of the waste has been cleaned up, much remains in barrels above and below the ground, opponents said. If covered up by a landfill liner and millions of tons of trash, the waste will seep into groundwater and poison residents, they said.

The Charpieds asked the board for an independent expert investigation of their claims.

Daniel Roman, chairman of the Eagle Mountain Landfill Opposition Coalition, demanded an account of the county's legal liability should toxic waste problems develop. He also said the entire project should be reconsidered.

Instead, supervisors agreed to ask the county health department to investigate the threat from any toxic waste. They also asked county legal staff to report back later this month on the extent of county liability for any toxic problems.

*U.S.GPO:1988-573-017/960

2/3/93 OUR VOICE Desert Sun D.S.-A-10

Landfill report can put an end to allegations

Supervisor-ordered study is best way to answer critics of landfill project.

VALLEY ISSUES

A report ordered by Riverside County supervisors should once and for all answer questions about whether hazardous materials were dumped at the proposed site of the Eagle Mountain Landfill.

The allegations that potentially toxic materials may have been buried at the former iron ore mine owned and operated by Kaiser Steel have come from persistent critics of the landfill.

A Desert Center couple, Larry and Donna Charpied, who live near the site 60 miles east of Indio, claim that California Bureau of Land Management inspectors two years ago found drums and cannisters buried at the site. They also say they have found evidence of more recent dumping.

Their claims were disputed by county Administrator Larry Parrish. He said earlier investigations by Health Department officials and the District Attorney's Office failed to turn up any evidence supporting the allegations.

He recommended against additional study, but county supervisors disagreed.

A new review of the charges may seem like a duplication of previous efforts, but if an investigation will answer the Charpieds and others who still have doubts about the safety of the landfill site, then the county should go ahead.

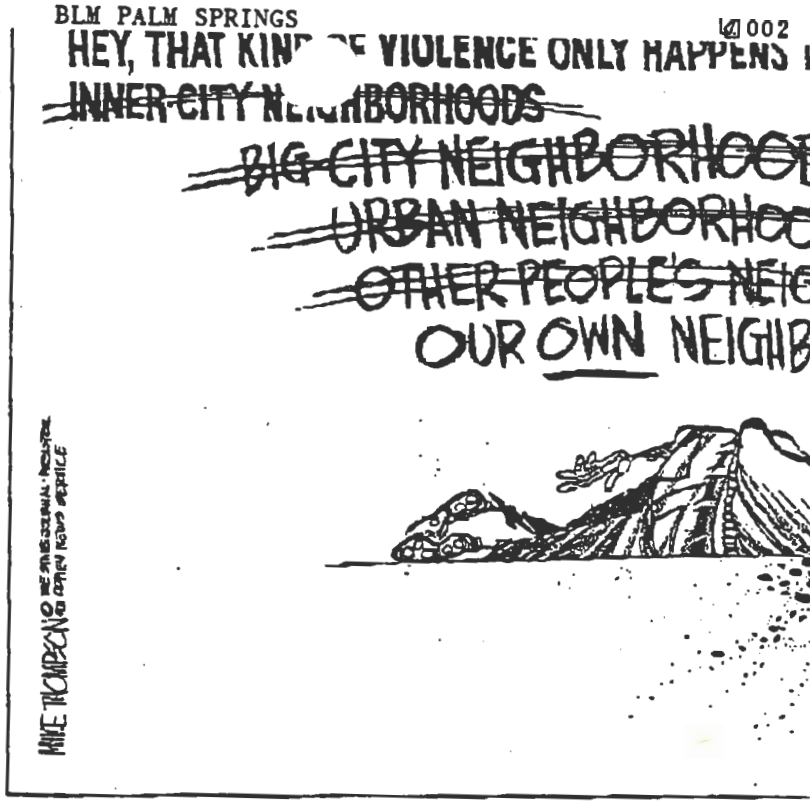
No matter what the findings, it shouldn't affect plans by Mine Reclamation Corp. to develop the site as a regional landfill.

The alleged dumping supposedly occurred during the years Kaiser controlled the mine site. It's that company's responsibility to take care of any problems that occurred.

MRC officials have been unusually open and frank about every aspect of the project. They've welcomed questions. They've provided detailed technical information to back up their claims that the landfill will be one of the most technologically advanced and environmentally safe in the world.

In short, they've provided strong evidence that the landfill will be an environmental and financial plus for all of Riverside County.

If one more report can silence the critics, it will be time and money well-spent.



You

LETTERS TO THE EDITOR

WRITE US: P.O. Box 2734, Palm Springs, CA 92263. Or fax letters to The Desert Sun at (619) 778-4654.

The Desert Sun welcomes letters that are original, free from libel, in good taste and 200 words or fewer. Letters must be signed with the writer's full name, address and phone number for verification. Only the name and city are printed.

Letters will be edited for clarity, grammar and length. Photos of the writer are welcome. No more than one letter from a contributor will be published in a 30-day period. Poetry is not published.

HEALTH: Canadians do have medical choice

As a steady winter visitor in Palm Springs for the past 11 years from the frozen north, i.e., Canada, I am following with amazement the misinformation being spread about our universal health care, or as some sources call it: socialized medicine.

To set the record straight once and for all: None of us senior snowbirds would give up our Canadian citizenship. Besides many other reasons, the most frequently quoted one is that we love and cherish our universal health care.

The recent elections in Canada proved this beyond any reasonable

Mr. Bennett's comment
problems faced in schools
alcohol, assault, rape, robb
pregnancy — was certainly
what does he think we do in
schools — advocate these t

In an editorial in the sar
The Desert Sun focused on a
idea involving parental choi
schools. The charter school
almost total parental and te
trol of what goes on at a l
school and is designed to set
so at this point it is limited to
sites statewide.

The original bills that pr
legislation were promoted b
ership of my own teachers
California Federation of T

Teachers and their unio
more than just oppose vou
also support parental choi
the public schools that alre
RC

C.V. Federation o

GEORGE WILL: [impugn patriot Ros

It's that time again. Or
took issue with your syndic
nist, George Will, when he
presented his pro-establish
the JFK assassination con

Now, once more, in
column he has aroused

Permit that may delay landfill appealed

By Douglas E. Beeman
The Press-Enterprise

Two companies involved in developing one of the nation's biggest landfills at the old Eagle Mountain iron ore mine near Desert Center have appealed a federal permit that could delay a key element of the landfill project.

Mine Reclamation Corp. and Kaiser Steel Resources are seeking to overturn a preliminary power permit issued by the Federal Energy Regulatory Commission. The permit may prevent the Bureau of Land Management from giving Kaiser some key acreage needed for the first phases of the landfill.

Mine Reclamation and Kaiser contend the federal energy commission improperly issued a preliminary power permit for a hydroelectric power plant in 1991 without making sure the project is sound. The companies have asked the U.S. Court of Appeals in Washington, D.C., to review the commission's decision.

Eagle Mountain Energy Corp. of Irvine wants to build a hydroelectric power plant using pits at Kaiser's old Eagle Mountain iron ore mine. The plant would spin electricity by dumping water from an upper reservoir through power turbines when electric demand is highest. At night, when electric demand is low, it would pump the water back to the highest reservoir.

Officials with Eagle Mountain Energy and with the federal energy commission contend the permit prohibits the BLM from completing the land exchange — at least until the commission decides whether to issue a final permit.

Michael Dotten, a Portland, Ore., attorney representing Mine Reclamation and Kaiser before the appeals court, said his clients do not believe the federal energy commission can issue a hydroelectric power plant permit when no body of water currently exists for it. He questioned where Eagle Mountain Energy would get water for its plant.

Arthur Lowe, president of Eagle Mountain Energy, said water can be obtained from a variety of sources that are being explored. He said the federal energy permit bars the BLM from exchanging land with Kaiser for the landfill project until the permit issue is resolved.

Kaiser and BLM officials have argued that the BLM announced it was contemplating a land exchange with Kaiser for the landfill in 1990, months before Eagle Mountain Energy filed for its federal energy permit. The hydroelectric proponents contend the BLM announcement expired last year, and that their permit takes precedence.

Dotten said a hearing before the appeals court could take nine months or so, but he said it doesn't necessarily have to hold up the land exchange.

Kaiser is proposing to exchange 2,849 acres of land it owns mostly south of Interstate 10 for 3,271 acres adjoining its shuttered Eagle Mountain iron ore mine.

Meanwhile, the Department of Interior's Board of Land Appeals has agreed to hear an appeal from two Desert Center residents opposed to the landfill. Donna and Larry Charpied have protested the BLM's land exchange plans, contending the BLM has violated its own regulations in considering the exchange.

James Roberts, an attorney with the Board of Land Appeals, said he did not know when the appeal would be heard.

Kay Hazen, a spokeswoman for Mine Reclamation, said she was unaware of the appeal.

California Department of Fish and Game
Natural Diversity Data Base
---===[*]=====---
Species/Community Location Summary Report

OVIS CANADENSIS NELSONI — ID: AMALE04013
Nelsons Bighorn Sheep

---------Status--------	NDDB Element Ranks	-------Other Lists-------
Federal: None	Global: G4T3	CDFG: No
State: None	State: S3	Audubon:
		CNPS List:
		CNPS RED Code:

Occurrence Number: 15
Quality: Unknown
Type: Natural/Native occurrence
Presence: Presumed Extant
Trend: Unknown
Quad Summary: Cottonwood Spring, San Bernardino Wash, Placer Canyon, Pinto Wells, Hayfield, Hayfield Spring, Desert Center, Additional Quads NOT Listed
County(ies): Riverside
Location: EAGLE MOUNTAINS. SHEEP DISPERSE FROM THE EAGLE PEAK-LOST PALMS DRAINAGE AND BUZZARD SPRINGS-EAGLE TANK AREAS WHENEVER FORAGE AND WATER CONDITIONS PERMIT.
Lat/Long: 33d 46m 43s / 115d 37m 33s
UTM: Zone-11 N3738285 E627227
Mapping Precision: SPECIFIC (0 Mile)
Symbol Type: POLYGON
Map Index Numbers - Group: 06295
Detail: 06295

--Dates Last Seen--
Element: 1986/XX/XX
Site: 1986/XX/XX

Township: 06S
Range: 14E
Section: --
Quarter: --
Meridian: S
Elevation: N/A

Occurrence Number: 16
Quality: Unknown
Type: Natural/Native occurrence
Presence: Presumed Extant
Trend: Decreasing
Quad Summary: East Of Victory Pass, Pinto Wells, Coxcomb Mts., Cadiz Valley SW, Cadiz Valley SE
County(ies): Riverside, San Bernardino
Location: COXCOMB MOUNTAINS.
Lat/Long: 33d 58m 53s / 115d 21m 21s
UTM: Zone-11 N3761140 E651861
Mapping Precision: SPECIFIC (0 Mile)
Symbol Type: POLYGON
Map Index Numbers - Group: 06375
Detail: 06375

--Dates Last Seen--
Element: 1986/XX/XX
Site: 1986/XX/XX

Township: 02S
Range: 16E
Section: --
Quarter: --
Meridian: M
Elevation: N/A

California Department of Fish and Game
Natural Diversity Data Base
---===[*]===---
Species/Community Location Summary Report

GOPHERUS AGASSIZII — ID: ARAAF01010
Desert Tortoise

Status	NDDB Element Ranks	Other Lists
Federal: Threatened	Global: G4	CDFG: No
State: Threatened	State: S2	Audubon:
		CNPS List:
		CNPS RED Code:

Occurrence Number: 14
Quality: Unknown
Type: Natural/Native occurrence
Presence: Presumed Extant
Trend: Unknown
Quad Summary: Victory Pass, East Of Victory Pass, Pinto Wells, Coxcomb Mts.
County(ies): Riverside
Location: N CHUCKWALLA VALLEY AT SW BASE OF COXCOMB MOUNTAINS, APPROX 9 AIR MI NE DESERT CENTER. SMALL AREA WITH ESTIMATED TOROTISE DENSITIES OF 20 TO 50/SQ MI.
Lat/Long: 33d 48m 53s / 115d 18m 48s
UTM: Zone-11 N3742702 E656090
Mapping Precision: SPECIFIC (0 Mile)
Symbol Type: POLYGON
Map Index Numbers - Group: 06368
Detail: 06368

--Dates Last Seen--
Element: 1986/XX/XX
Site: 1986/XX/XX

Township: 04S
Range: 16E
Section: 07
Quarter: --
Meridian: S
Elevation: N/A

Occurrence Number: 15
Quality: Unknown
Type: Natural/Native occurrence
Presence: Presumed Extant
Trend: Unknown
Quad Summary: Buzzard Spring, Victory Pass
County(ies): Riverside
Location: NW CHUCKWALLA VALLEY AT BASE OF EAGLE MTS APPROX 6 AIR MI NW OF DESERT CENTER. SMALL AREA WITH ESTIMATED TORTOISE DENSITIES OF 20 TO 50/SQ MI.
Lat/Long: 33d 46m 50s / 115d 27m 57s
UTM: Zone-11 N3738706 E642034
Mapping Precision: SPECIFIC (0 Mile)
Symbol Type: POLYGON
Map Index Numbers - Group: 06316
Detail: 06316

--Dates Last Seen--
Element: 1986/XX/XX
Site: 1986/XX/XX

Township: 04S
Range: 14E
Section: 25
Quarter: --
Meridian: S
Elevation: N/A

California Department of Fish and Game
Natural Diversity Data Base
---===[*]===---
Species/Community Location Summary Report

GOPHERUS AGASSIZII — ID: ARAAF01010
Desert Tortoise

Occurrence Number: 16
Quality: Unknown
Type: Natural/Native occurrence
Presence: Presumed Extant
Trend: Unknown

--Dates Last Seen--
Element: 1986/XX/XX
Site: 1986/XX/XX

Quad Summary: Porcupine Wash, Conejo Well, Buzzard Spring, Pinto Mountain, San Bernardino Wash, Placer Canyon
County(ies): Riverside
Location: S PINTO BASIN BTWN EAGLE AND PINTO MTNS, JOSHUA TREE NATL MONUMENT. SMALL AREA WITH ESTIMATED TORTOISE DENSITIES OF 20 TO 50/SQ MI.
Lat/Long: 33d 50m 52s / 115d 47m 26s
UTM: Zone-11 N3745772 E611891
Mapping Precision: SPECIFIC (0 Mile)
Symbol Type: POLYGON
Map Index Numbers - Group: 06153
Detail: 06153

Township: 04S
Range: 12E
Section: 04
Quarter: --
Meridian: S
Elevation: N/A

California Department of Fish and Game
Natural Diversity Data Base
---===[*]======
Species/Community Location Summary Report

ESCOBARIA VIVIPARA VAR ALVERSONII — ID: PDCAC040G1
Foxtail Cactus

---------Status--------	NDDB Element Ranks	-------Other Lists-------
Federal: Category 2	Global: G4T3	CDFG: No
State: None	State: S2.2	Audubon:
		CNPS List: 1B
		CNPS RED Code: 3-2-2

Occurrence Number: 11
Quality: Unknown
Type: Natural/Native occurrence
Presence: Presumed Extant
Trend: Unknown
Quad Summary: Victory Pass
County(ies): Riverside
Location: E END OF EAGLE MTS, NEAR EAGLE MTN PUMPING STATION.
Lat/Long: 33d 48m 29s / 115d 27m 39s
UTM: Zone-11 N3741744 E642441
Mapping Precision: NON-SPECIFIC (1 Mile)
Symbol Type: POINT
Map Index Numbers - Group: 06321
Detail: 06321

--Dates Last Seen--
Element: 1961/12/01
Site: 1961/12/01

Township: 04S
Range: 14E
Section: 24
Quarter: SE
Meridian: S
Elevation: 1200 ft

California Department of Fish and Game
Natural Diversity Data Base
---===[*]======-
Species/Community Location Summary Report

DITAXIS CALIFORNICA ID: PDEUP08050
California Ditaxis

---------Status--------	NDDB Element Ranks	-------Other Lists-------
Federal: Category 2	Global: G2	CDFG: No
State: None	State: S2.2	Audubon:
		CNPS List: 1B
		CNPS RED Code: 3-2-3

Occurrence Number: 11
Quality: Unknown
Type: Natural/Native occurrence
Presence: Presumed Extant
Trend: Unknown
Quad Summary: Victory Pass
County(ies): Riverside
Location: E BASE EAGLE MTS, 8 MI N OF JCT W/HWY 60/70 ON ROAD TO EAGLE MTN PUMPING STATION.
Lat/Long: 33d 48m 27s / 115d 27m 37s
UTM: Zone-11 N3741714 E642493
Mapping Precision: NON-SPECIFIC (1 Mile)
Symbol Type: POINT
Map Index Numbers - Group: 06323
Detail: 06321

--Dates Last Seen--
Element: 1956/05/02
Site: 1956/05/02

Township: 04S
Range: 14E
Section: 13
Quarter: --
Meridian: S
Elevation: 1000 ft

4726

STATE OF CALIFORNIA — ENVIRONMENTAL PROTECTION AGENCY

PETE WILSON, Governor

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Region 4
245 West Broadway, Suite 350
Long Beach, CA 90802-4444

Document Control No. 863
File No. 62316.38
File Code
cc:
Date Received 8/1/94

ADDENDUM REPORT

Eagle Mountain Mine
(EMM)

Desert Center, CA 92239
EPA ID # CAD003934890

Inspected by: Richard Hubbell
Dates of Inspection: February 10 & 11, 1994
Report by: Richard Hubbell
Date of Report: April 7, 1994
Addendum Report by: Richard Hubbell
Date of Addendum Report: May 20, 1994

I. Purpose

This Addendum Report (Addendum) supplements the April 7, 1994, Eagle Mountain Mine, COMPLAINT INSPECTION AND SAMPLING REPORT (Report). The Addendum includes factual corrections, grammatical corrections, and supplemental information to the Report.

The conclusions of the Report remain substantively the same. As was stated at the April 8, 1994 meeting, there was no evidence found to support the allegations that hazardous materials were illegally disposed. The site does not currently threaten the environment.

On April 8, 1994, a meeting was held at the Bureau of Land Management (BLM) Palm Springs office involving the Department of Toxic Substances Control (DTSC), Larry & Donna Charpied, Kaiser Resources, Inc. (KRI), Riverside County Environmental Health Services (RCEHS) and BLM. The meeting participants provided additional information, and noted various corrections that should be made in the report. DTSC promised to have a conference call with the Charpieds and a DTSC toxicologist to explain the health risks associated with the soil sample analytical data. The conference call took place May 19, 1994.

On May 19, 1994, DTSC toxicologist Dr. Judy Parker, Sharon Fair, Richard Hubbell, Larry & Donna Charpied, Joe Asbury and John Fanning of RCEHS, participated in a telephone conference call to discuss the health risks associated with the different hazardous constituents found in some of the samples taken at Eagle Mountain. Dr. Parker explained that the level of toluene found in the EC-1-C sample was calculated to be 1/10,000 of the safe level that U.S. EPA would allow for a worst case scenario, that is, a 2 year old child eating the soil for a period of 70 years. Dr. Parker said such levels did not warrant further investigation. Regarding the Fine Tailings Ponds, Dr. Parker reiterated that the ponds are outside DTSC's jurisdiction, and DTSC has no authority to require any further investigation of the ponds.

II. Changes

The fifteen changes to the Report are as follows:

1) Report page 3, first line, should read, "Core Garden...hundreds of drums of hazardous waste excavated, the remaining recovered in 1992".

2) Report page 4, first paragraph, the following sentences should be inserted after the sentence ending with "July, 1995":
"Clean-ups of the scrap & salvage areas, the Central Pit Fueling Area, Powder Magazine, Scrap Staging Area, and East Pit Fueling Area were completed as of April 8, 1994, according to information provided by Kaiser Resources, Inc. However, additional clean-up of the demolition area (which includes the Metallurgical Laboratory, Beneficiation Plant, and the Fine Crusher Area), the Main Shop Fueling Area, and the Open Burn Pits, will be done by July, 1995 under the oversight of Riverside County's Environmental Health Division. The clean-up will include collection of scrap metal and remediation of oil or chemical contamination of the ground."

3) Report page 4, first paragraph, the last sentence which reads:
"In 1988, the mine site and other Kaiser assets were organizationally separated from the Fontana mill site to form Kaiser Resources Inc."
should be changed to read:
"In 1988, the mine site and other Kaiser assets were organizationally separated from the Fontana mill site under the reorganized successor of Kaiser Resources Inc."

4) Report page 7, #6, Fine Tailings Pond, first paragraph, the following sentence should be inserted after the sentence ending with, "...data analysis from water sampling and soil sampling":
"Several documents were noted in the Draft Environmental Impact Report for this site which indicated possible leakage from the ponds in the late 1960s."

5) Report page 7, #6, Fine Tailings Pond, second paragraph, the line which reads:
"...none of high are hazardous waste constituents."
should be changed to read, "...none of which are hazardous constituents."

6) Report page 9, Jan Roberts should be listed as the Kaiser Resources, Inc. (KRI) Director of Eagle Mountain Operations; she does not work for Mine Reclamation Inc. (MRI).

7) Report page 9; in addition to those persons listed as DTSC representatives, Rani Patole, Industrial Hygienist, was also in attendance.

8) Report pages 15 and 16, paragraph five, Open Burn Pits, the numbers of pits should be corrected to read:
"We observed three open trenches which were oriented in an east-west direction, and four closed pits."

9) Report page 16, first paragraph, the following sentence should be inserted after the sentence ending with, "closed pits had been partially reopened at the direction of RCEHS.":
"The "slit trenches" had been filled with construction debris, including wood, pipes, wires, and assorted scrap metals, including automobile bodies, which had then been set afire, and covered over with soil."

10) Report page 16, "V. Sampling and Chain of Custody", third paragraph, the following sentences should be inserted after the sentence ending with, "...below the regulatory levels for toxicity.":
"At the time of the inspection, the Department, Charpieds and Kaiser Resources decided not to analyze the Eagle Creek Wash and Scrap Staging Area samples for volatile organic constituents, since the photo-ionization detector field survey did not detect any organic vapors. Later, however, the Charpieds had the Eagle Creek Wash (EC-1-C) and Scrap Staging Area (SC-1-C) samples analyzed for volatile constituents using EPA Method 8240, and they provided the results to DTSC (Attachment 1A). The EC-1-C sample was found to have 37 parts per billion (ppb) of toluene and 170 ppb of p-isopropyl toluene. The SC-1-C sample was found to have 72 ppb n-butylbenzene, 31 ppb tert-butylbenzene, 92 ppb p-isopropyltoluene, 20 ppb napthalene, 28 ppb n-propylbenzene, 560 ppb 1,2,4-trimethylbenzene, and 220 ppb 1,3,5-trimethylbenzene. DTSC toxicologist Judy Parker, Ph.D., reviewed this data. Dr. Parker concluded that all these constituent levels were well below health risk based clean-up levels established by U.S.EPA, and did not therefore warrant further investigation."

11) Report page 17, first paragraph, Conclusions, the following sentence should be added to the end of the paragraph:
"At the time of the inspection, there were no hazardous wastes found to have been improperly disposed at the mine site."

12) Report page 17, second paragraph, the following sentence should be inserted after the sentence ending with, "... are located outside of the proposed landfill footprint": "...except the Shovel Area - North (SH-2)."

13) Report page 17, second paragraph, the following sentences should be inserted at the end of the paragraph:
Two magnetometer profiles were recorded during the inspection; however, their reliability could not be assured due to the widespread presence of magnetite ore tailings throughout the site. The results were inconclusive without more extensive surveys.

14) Report page 17, third paragraph, should be divided into two paragraphs as follows:
"The highest concentration of any hazardous constituent found in the tailings pond was approximately 600 mg/kg of copper. The California hazardous regulatory level for copper is 2,400 mg/kg total copper. Copper is not a federal RCRA hazardous constituent. Therefore, the fine tailings would be regulated under the jurisdiction of the Regional Water Quality Control Board, as explained in section IV. Regulatory Status of Site, Regulatory Definitions B.4. and B.6. on pages 6 & 7 of the Report."

"Based on information provided by the CR-RWQCB, the highest concentration of copper found in the fine tailings pond monitoring wells is 0.09 mg/l, and typically the copper values are much lower. In the worst case, the copper concentration is only 10% of the "objectionable" standard for water quality. These findings corroborate U.S. EPA's rulemaking findings that beneficiation wastes are typically low toxicity and low mobility waste streams."

15) Report page 17, fourth paragraph should include the following statement:

"The Colorado River Regional Water Quality Control Board has the regulatory jurisdiction to determine what levels of heavy metals in the tailings are acceptable for use as landfill liner material, and to prescribe fugitive dust emission controls in the event the tailings are moved."

The staff from the Department of Toxic Substances Control would like to acknowledge the extensive assistance and cooperation we received from the parties who were interested and involved in this complaint investigation, including representatives of the Bureau of Land Management, the Riverside County Department of Environmental Health, the Integrated Waste Management Board, Citizens of the Chuckwalla Valley, Kaiser Resources, Inc., and the Mine Reclamation Corporation.

If further information or clarification concerning the complaint investigation report or this addendum report is needed, please contact Richard Hubbell at (310) 590-5920, or Sharon Fair at (310) 590-5913.

Richard Hubbell Ray Jr.

Richard Hubbell
Associate Hazardous Materials Specialist
Surveillance and Enforcement Branch

5/20/94
Date Prepared

Sharon Fair

Sharon Fair
Unit Chief
Surveillance and Enforcement Branch

5/20/94
Date Reviewed

EAGLE MOUNTAIN MINE
MAILING LIST
Revised 2/2/94

John Key
U.S. Dept. of Interior
Bureau of Land Management
CA Desert District
6221 Box Springs Blvd.
Riverside, CA 92507-0714
FAX: (909) 697-5299

Kenneth Cohen, Director
Health Services Agency
and
John Fanning, Director
Dept. of Environ. Health
and
William Katzenstein,
Office of County Counsel
County of Riverside
4065 County Circle Drive
Riverside, CA 92503
FAX: (909) 358-5017

Edgar D. Bailey, Chief
and
Donald Bunn
CA Dept. of Health Services
Radiological Health Branch
601 No. 7th Street
Sacramento, CA 95814
FAX: (916)324-3610

Robert Conheim, Senior Counsel
and
Don Dier, Permitting Branch Manager
and
David Otsubo, Project Manager
CA Integrated Waste Management Board
Permitting and Enforcement Division
8800 Cal Center Drive
Sacramento, CA 95826
FAX: (916) 255-2574

Carolyn Douglas
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, CA 94105-3901
FAX: (415) 744-1044

EAGLE MOUNTAIN MINE
MAILING LIST
Continued

Robert Purdue, Sr. Engr. Geologist
and
LeAnne Chavez, Assoc. WRC Engr.
Colorado River Basin
Regional Water Quality Control Board
73-720 Fred Waring Drive, Suite 100
Palm Desert, CA 92260
FAX: (619) 341-6820

Larry and Donna Charpied
Citizens for the Chuckwalla Valley
P.O. Box 397
Desert Center, CA 92239
FAX: (619) 392-4722

John A. Hinton, Ombudsman
Office of External Affairs
Dept. of Toxic Substances Control
245 W. Broadway, Suite 425
Long Beach CA 90802-4444
FAX: (310) 590-4936

Gerald A. Fawcett, Executive Vice-President
and
Robert Hartman, Environmental Projects Manager
Kaiser Resources, Inc.
8300 Utica Avenue, Suite 301
P.O. Box 2249
Rancho Cucamonga, CA 91729
FAX: (909) 944-4158

Gary Johnson, Senior Vice-President
Mine Reclamation Corp.
960 Tahquitz Canyon, Suite 204
Palm Springs, CA 92262

Kay Ceniceros, Chairperson
Riverside County Board of Supervisors
P.O. Box 1359
Riverside, CA 92502

Dan Roman
and
Robert Roman
44-446 Biskra
Indio, CA 92201

Acquisition or (Disposal) (Exchange)
(Circle One)
Serial CA30070 FD (Public Lands)
CA Office Code CA-066.60

California BLM
Level I Survey
Contaminant Survey Checklist
of Proposed Real Estate Acquisitions and Disposals

INSTRUCTIONS: Check for each category. Explain briefly where something other than "No", "None," or "Not Applicable" is checked. Discuss whether a Level II or III Survey will be recommended. Describe the distance if nearby is checked and whether there is a known potential pathway for contamination on site. Attach a legal description of the real estate property covered by this Survey if several parcels are covered.

A. Background Information

Project Name Eagle Mountain County Riverside State California

Legal Description See "Selected Public Lands" and map attached
Landowner Name Public Lands District CDD RA Palm Springs-South Co.
Date of Survey 9/24-25/92

B. Site Inspection Screen: On-site and nearby	ONSITE	NEARBY	NONE	
1. Dump sites especially with drums, containers (Read labels if possible; do not open or handle! If no labels, note identifying characteristics)	X			*See NOTE
2. Other debris potentially causing problems (e.g. paint cans, industrial waste, mining wastes, etc)	X			
3. Fill material: possible cover for dumps	X			
4. Unusual chemical odors		X		
5. Storage tanks: petroleum products, pesticides, etc.		X		
6. Buildings: chemical storage, equipment repair, solvents, asbestos containing materials	X			
7. Vegetation different from surrounding for no apparent reason, e.g. bare ground			X	
8. "Sterile" or modified water bodies			X	
9. Oil seeps, stained ground, discolored stream banks			X	
10. Oil slicks on water, unusual colors in water			X	
11. Spray operation base: air strip, equipment parking area			X	
12. Machinery repair areas		X		
13. Pipelines; major electrical equipment		X		
14. Oiled or formerly oiled roads	X			
15. Evidence of leakage around electric transmission lines: pole mounted transformers, pad mounted transformers			X	

*NOTE: KAISER IS SIGNING A WAIVER REGARDING ANY POTENTIAL HAZARDS OR HAZARDOUS MATERIALS WHICH IS ATTACHED TO THIS LEVEL I CONTAMINANT SURVEY

C. Record Searches (Coordinate with Realty, title search, others as appropriate).

1. Past uses which might indicate potential problems of site (CIRCLE any that are applicable).

   Manufacturing, service stations, dry cleaning, air strip, pipelines, rail lines, facilities with large electrical transformers or pumping equipment, petroleum production, landfills, scrap metal, auto, or battery recycling, military, labs, wood preserving, agricultural chemicals, other describe: See Note on first page — None *

2. Nearby land uses, especially upstream or upgradient, or that might have had waste to dump at site. Identify: dump/storage — None *

3. Known contaminant sites in vicinity: NPL, state sites, candidate sites (check with EPA; State EPA counterpart). — Yes ___ No X

4. Interviews on past use: owners, neighbors, county agents and any appropriate Federal authorities: Problems? — Yes * No ___

5. Agricultural drainage history: surface, subsurface drains. — Yes ___ No X

D. A Federal agency has notified the Department under section 120(h) of CERCLA (Superfund) of past or current presence of a hazardous substance. Not Applicable ___ — Yes ___ No X

E. A non-Federal entity has documented hazardous materials on or near the site. Not Applicable ___ . — Yes ___ No X

F. A Level II study is recommended. — Yes ___ No *
   A Level III study is recommended. — Yes ___ No *

*See Note on first page.

G. Disposal Certification Kaiser Eagle Mountain, Inc. has signed a waiver attached to this report.

The above described lands have been examined in accordance with Section 120(h) of SARA. No evidence or recorded information was found to indicate that any hazardous substance was stored for one year or more or disposed of or released on the property.

Field Personnel

Signed Verla J. Harle Print Name Verla J. Harle

Date 2/9/93 Title Realty Specialist

Area Manager

Russell Kaldenberg ✓ Concur ____ Do Not Concur 2/10/93 Date

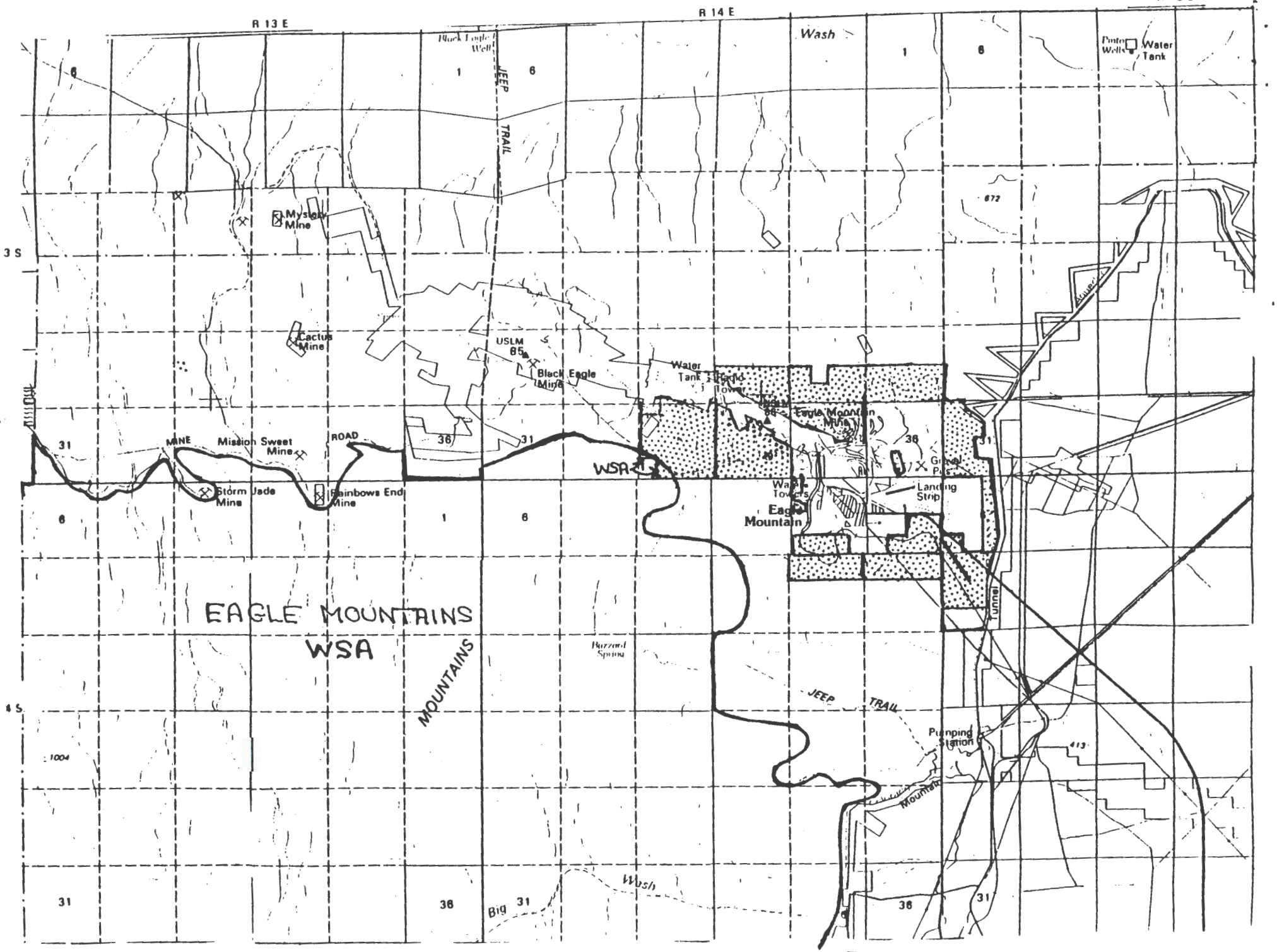
DO Haz Mat Coordinator

John W. Key ✓ Concur ____ Do Not Concur 2/16/93 Date

District Manager

Signed Henri R. Bisson Print Name Henri R. Bisson

Date 2/16/93 Title District Manager



CACA 30070 FD - SELECTED PUBLIC LANDS

Selected Public Lands

All remaining public lands located in:

San Bernardino Meridian
Riverside County, California

T. 3 S., R. 14 E.

Sec. 25:	Lots 5 and 6, SW¼, W½SE¼
Sec. 26:	SW¼, SW¼SE¼, E½SE¼
Sec. 27:	Lots 1 and 2, SE¼, N½SW¼
Sec. 28:	Lot 9
Sec. 33:	Lots 1, 2, 4 and 5, S½NE¼, E½NW¼, E½SW¼, SE¼
Sec. 34:	Lots 1-7, SE¼SE¼, W½SE¼, SW¼
Sec. 35:	Lots 1-4 and 9, NE¼NW¼, N½NE¼
Sec. 36:	Lot 12

T. 3 S., R. 15 E.

Sec. 31:	Lots 5, 10-14, 17-19

T. 4 S., R. 14 E.,

Sec. 1:	Lots 8-11, SW¼SE¼, E½SE¼SW¼, E½NW¼SE¼
Sec. 2:	Lots 7-9, S½SW¼, SW¼SE¼, W½SE¼SE¼
Sec. 11:	Lots 1-4
Sec. 12:	Lots 1-4

T. 4 S., R. 15 E.,

Sec. 6:	Lots 4, 5, 8-11
Sec. 7:	Lots 4-10, 12 and 13

These selected lands total 3,512.47 acres, more or less.

T 3 S., R. _ , E.

T. 3 S., R. 14 E.

T. 3 S., R. 15 E., SEC. 31

BROKEN WATER PIPELINE

BARREL AND WASTE DISPOSAL ON MOUNTAINSIDE

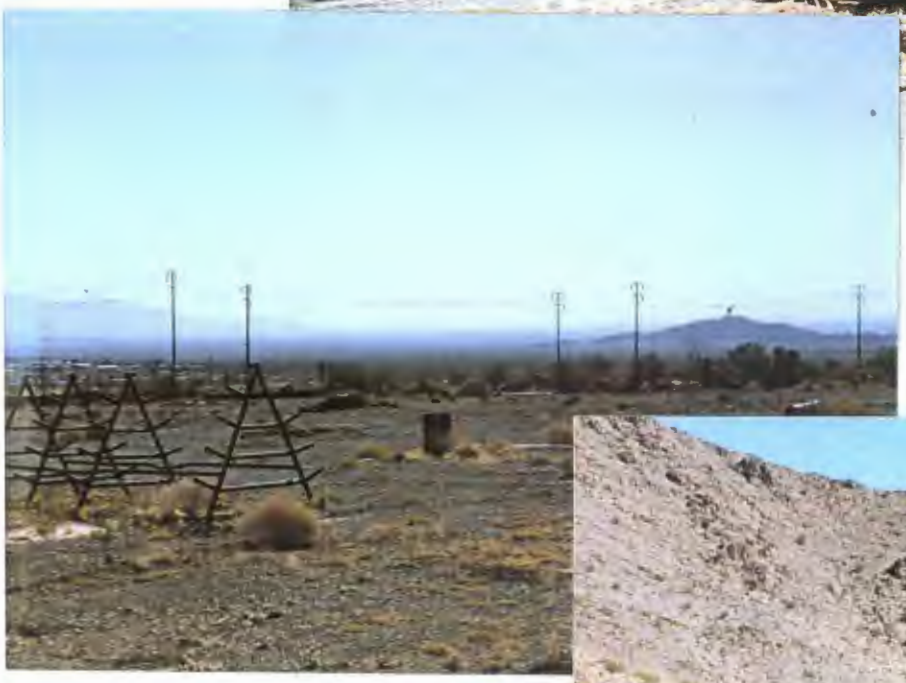
T. 3 S., R. 15 E., SEC. 31

COVERED BARRELS, NOT EMPTY

T. 4 S., R. 14 E.

PANORAMIC VIEW OF SEC. 2

T. 4 S., R. 14 E.



BARRELS OF UNKNOWN MATERIAL, TIRES, RAILROAD SPUR

SEWAGE TREATMENT PONDS

SEWAGE TREATMENT PONDS

T. 4 S., R. 14 E., SEC. 11-12

SEWAGE TREATMENT PONDS

T. 4 S., R. 14 E., SEC. 12

OLD 4-H, SADDLE CLUB AND RODEO GROUNDS

T. 4 S., R. 14 E., SEC. 12

POSSIBLY A DRUG LAB IN SEC. 12 AT ONE TIME

T. 4 S., R. 15 E., SEC. 6

EMPTY DRUM, NO MARKINGS

PIPELINE

T. 4 S., R. 15 E., SEC. 6

MILL TAILINGS WITH PIPE

ANOTHER DRUM

T. 4 S., R. 15 E., SEC. 6

EXPOSED PIPELINE WRAPPER, MATERIAL UNKNOWN

ADDITIONAL BARRELS

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Palm Springs — South Coast Resource Area
63-500 Garnet Avenue
Post Office Box 2000
North Palm Springs, CA 92258-2000

TAKE PRIDE IN AMERICA

IN REPLY REFER TO:

2200
CACA 30070
(CA-066.60)

FEB 10 1993

Mr. Gerald A. Fawcett, President
Kaiser Eagle Mountain, Inc.
8300 Utica Avenue, Suite 301
Rancho Cucamonga, CA 91730

Dear Mr. Fawcett:

It was agreed at our January 19, 1993 meeting that Kaiser Eagle Mountain, Inc. would waive BLM responsibility for any hazardous materials on the selected public lands included in the Eagle Mountain exchange (CACA 30070), and the waiver will be included in the patent issued. We would suggest this waiver:

> "If at any time after the conveyance of this land, any condition on the land covered by this patent is found to be in violation of any Federal, State or local laws or regulations, the Patentee shall immediately take all actions necessary to abate any such violation, and perform all activities required to remediate the site or condition consistent with all applicable Federal, State and local laws and regulations, irrespective of whether the Patentee caused, contributed to, or had actual knowledge of the activities or conditions causing the violation(s). Further, the Patentee shall hold the United States harmless from any liability and expense, including any court costs, attorney's fees or administrative costs, resulting from any such condition or activities. The Patentee's obligations under this provision shall continue in perpetuity."

If you concur, please sign at the bottom of this letter, which will be included with the Level I Contaminant Survey and in the exchange case file, CACA 30070.

Sincerely,

Russell L. Kaldenberg,
Area Manager

KAISER EAGLE MOUNTAIN, INC.

By: Gerald A. Fawcett

Title: EXECUTIVE VICE PRESIDENT

RECEIVED
BUREAU OF LAND MANAGEMENT
93 NOV -9 PM 12:44
DISTRICT
RIVERSIDE, CA.

ROUTING

TO	DATE	BY
DM	11/12	
ADM	11/16	
SA-W.M.		
SA-SCAG		
DSR		
P&EA	11/15	
PA		
ADMIN		
OPS		
L&RR		
MIN		
AMS		

ACTION RETURN BY TO CENTRAL FILES

DONNA AND LARRY CHARPIED
P.O. BOX 321
DESERT CENTER CA 92239
NOVEMBER 6, 1993

MR. GERALD FAWCETT
EXECUTIVE VICE PRESIDENT
KAISER RESOURCES INC.
8300 UTICA AVE., SUITE 301
RANCHO CUCAMONGA CA 91729

Dear Mr. Fawcett,

This is in response to your letter dated November 5, 1993, and hand delivered to Donna Charpied at approximately 1:00 PM, Saturday November 6, 1993, at our farm located at 45-200 Kaiser Road, Desert Center, by one of your employees. We have lived and farmed in this community for 13 years, and like you, we too are dedicated to being responsible citizens who participate in our desert community and will be for some time to come. Being certified organic farmers, we are greatly concerned about our water quality, for our farming operations, as well as for the well being of our community. You have attempted to address some of our concerns raised in the past, and recently. We feel that you may not understand our concerns and will attempt to clarify them for you by addressing your conclusions of your November 5, 1993 letter as follows:

1. You stated that the fine tailings and the earth beneath were tested and no contamination was found. However, in Volume 10 of the Administrative Record before Judge Judith McConnell of the California Superior Court in San Diego shows analysis of the fine tailings detecting Arsenic, Beryllium, Cadmium, Chromium, Hexavalent Chromium, and Nickel. The significance of this is, this material will be incorporated into the liner system, and coming into contact with leachate (garbage juice), could result in unforeseen chemical reactions, that could have a significant impact to our water quality. Furthermore, according to manifests that the RIVERSIDE COUNTY DEPARTMENT OF ENVIRONMENTAL HEALTH had sent to us show that barrels of liquids, with the chemical composition of Ethylbenzens, Xylene, Acetone, Toluene, Barium, Mercury, and barrels of PCB's were removed from the site. This information was withheld from us, as well as the RIVERSIDE BOARD OF SUPERVISORS, during the hearing process on the proposed dump. Also, the above cited chemicals seem to have been omitted from the analysis performed by your independent laboratory.

2. We issued a Freedom of Information Act request for the Level - I Contaminant Survey conducted by the Bureau Of Land Management (BLM) for the selected public lands at Eagle Mountain. Therefore, we feel that we have the full text of this document. This survey clearly shows that there are dump sites, barrels of unknown material, chemical odors, broken pipelines, and waste deposited on the mountain side. Anywhere on the survey that warrants an explanation is marked with an asterisk. The asterisk states that Kaiser has agreed to sign a waiver of liability to relieve the Federal Government of any responsibility, for perpetuity. Unfortunately "perpetuity" for Kaiser is whenever you declare bankruptcy. A waiver of liability is no remediation at all. Despite your claims that there is no hazardous materials at the site, the survey clearly indicates otherwise, and there have been no further investigations to substantiate your claims. Furthermore, since Kaiser and the County's Environmental Health Department have claimed, well over a year ago, that the hazardous materials have been cleaned up, the people of the desert communities are requesting citizen oversight to future clean up activities. Kaiser employees, in the past, and most recently last August, have drawn explicit maps for us where Kaiser has buried hazardous materials. These maps have been distributed to others, for safety reasons. We contend that there is a concerted effort to cover up this problem with certain BLM officials, Environmental Health officials, and executives of Kaiser, MRC and BFI. The suspicion arises from the mere fact that any information relating to

represents a very serious threat to the Eagle Mountain school children.

This brings us to the recent activities of November 1 through 4. You allegedly told the media that there is no night time activity, at the site, and that is just not true. Therefore, on the night of November 4, 1993, we asked the Sheriff to go to Eagle Mountain to inquire what is happening. Our contention was that hazardous materials were being removed, as you removed it during the night in 1992. However, the Sheriff reported that you are mining, and a rock crusher and oil to mix the gravel for road repair, is the reason we are seeing lights from near the East Pit area. We suppose you told the media there is no activity because you are aware that mining without environmental review is against the Development Agreement Number 47 that Kaiser signed with the Board of Supervisors. We are also aware, that FCI Contractors applied for an asphalt batch plant, a few months ago, to do road work in Desert Center, and the Planning Department denied them.

In closing, we see that Kaiser cannot comply with even the simplest conditions of approval, what can we expect once you are the landlords of the Nation's largest dump ? In light of all this information, and the relationship that seems to have been formed between Kaiser, BLM, County Environmental Health, MRC/BFI, citizens are insisting on investigations to get to the bottom of this. We will maintain pressure for Congressional "Field Hearings" into the BLM, as well as other Federal and State investigations. Throughout this entire process the burden of proof has been on the citizens, and now we feel we have that proof. We must reiterate our findings and conclusions show great harm to our community, the environment, and our precious water. As you stated in your letter, we believe the public has a right to know the facts. Please do not hesitate contacting us at (619) 392-4722 should you have any questions.

Yours Truly,

Donna Charpied
DONNA CHARPIED

Larry Charpied
LARRY CHARPIED

CC: See attached list

MR. PHIL HAMPTON
DESERT SUN
P.O. BOX 2734
PALM SPRINGS CA 92263

THE PRESS ENTERPRISE
MARCIA McQUERN, EDITOR
3512 14th STREET
RIVERSIDE CA 92501

MR. RON FORTNER
KNWZ RADIO
P.O. BOX 12700
PALM DESERT CA 92255

INTERESTED PARTIES

STATE OF CALIFORNIA — ENVIRONMENTAL PROTECTI[illegible]ENCY

PETE WILSON, Governor

DEPARTMENT OF TOXIC SUBSTANCES CONTROL
Region 4
245 West Broadway, Suite 350
Long Beach, CA 90802-4444

Document Control 862
File No. 62316[illegible]
File Code
cc:
Date Received 8/1/94

COMPLAINT INSPECTION AND SAMPLING REPORT
Eagle Mountain Mine
(EMM)

Desert Center, CA 92239
EPA ID# CAD003934890

Inspected by: Richard Hubbell
Dates of Inspection: February 10 & 11, 1994
Report by: Richard Hubbell
Date of Report: April 7, 1994

recycled paper

I. Purpose

In December 1993, the Riverside County Department of Environmental Health requested assistance from the Department of Toxic Substances Control (DTSC) in the investigation of citizen complaints that hazardous waste had been illegally disposed at the Eagle Mountain Mine. This request was formalized on January 11, 1994 following a resolution by the Riverside County Board of Supervisors. DTSC agreed to meet with the complainants, review site information, conduct a site inspection and to make recommendations concerning methods for further site characterization and remediation as needed.

II. Complaint Allegations

Complainants had alleged for about five years that hazardous wastes in large quantities were buried on this site, including PCBs, solvents, and waste oils. Several complainants have filed lawsuits regarding environmental issues against Kaiser Resources, Inc. (KRI), Mine Reclamation Corporation (MRC), and Riverside County, and filed an injunction against the U. S. Department of the Interior Bureau of Land Management (BLM) to prevent a land exchange for portion of the mine.

On January 27, 1994, Sharon Fair, Richard Hubbell and Chris Guerre of DTSC met with complainants Larry and Donna Charpied, Daniel and Robert Roman, and Lowell Ball to discuss sites at the Eagle Mountain Mine where hazardous waste may have been disposed. The information provided by the Charpieds, Romans, and Mr. Ball is summarized as follow:

Location:	Potential hazardous waste disposed:
Central Pit Fueling Station	Used motor oil from heavy equipment oil changes.
Underground	Off-site hazardous waste, type unknown
9% Grade Shovel Area	Used oil, solvent from heavy equipment maintenance
Metallurgical Lab	Lab chemicals disposed to tailings pond
Beneficiation Plant Area	PCBs and Oils drained to sump and out to Fine Tailings pond. PCB's burned in plant fire.
Scrap Staging Area & Main Shop Fueling Area	Oils, solvents
Coarse Tailings Pile	Unknown hazardous waste
Fine Tailings Pond	Oils, PCBs, solvent
East Pit Storage Yard	Oils and solvents
East Pit Overburden Pile	Drums of hazardous waste, type unknown

Core Garden	Hundreds of drums of hazardous waste excavated and reburied in December 1993
Jenkinville Site	Used motor oil from heavy equipment oil changes disposed to ground.
Open Burn Pits	Oil solvent paint

Citizens for the Chuckwalla Valley, represented by the above-listed persons, were concerned that residuals from past disposal of hazardous waste at the Eagle Mountain Mine could remain underground, with chemical contamination of groundwater, soil, and air accelerated and/or potentiated by the installation of a proposed Class III sanitary landfill. The citizens' groups also expressed the perception that these issues were not fully investigated and resolved by other agencies. A Riverside County Grand Jury investigation of these complaints was conducted in 1989; however, it did not result in the filing of any criminal charges for illegal treatment, storage, or disposal of hazardous wastes.

III. Site Background/ Proposed Landfill Project

A. Mining Operations

The Eagle Mountain Mine is located in Riverside County, 60 miles east of Indio. Eagle Mountain was acquired by Kaiser Steel Corporation in 1944, and mine production of iron ore began in 1948. The mine provided blast furnace feed for Kaiser's Fontana steel mill and ore for export to Japan. The closing of the Fontana steel mill caused the Eagle Mountain Mine to stop operating in 1983.

Kaiser mining operations included beneficiation facilities and ore blending installations to produce concentrated ores. Kaiser developed slurry blasting and down-the-hole drilling technologies. The water process mining operation utilized metal separators, magnetic separation and process facilities. Other operations included primary and secondary crushing, pelletizing, and loading. The basic purpose of the beneficiation processes at the mine site was to separate iron-bearing minerals from the non-iron-bearing minerals without changing the chemical nature of the minerals, and then to pelletize the concentrated ore for ease of handling and proper smelting characteristics. No acids or hazardous chemicals were used to process the ores.

In 1986, Kaiser developed a workplan to dismantle the mining operations and the former mine labor camp. This workplan is being carried out under the oversight of

Riverside County and other regulatory agencies. Current projections are that the clean-up should be completed by approximately July, 1995. On February 11, 1987, Kaiser Steel filed bankruptcy due to problems at the Fontana mill site. In 1988, the mine site and other Kaiser assets were organizationally separated from the Fontana mill site ~~to form~~ under Kaiser Resources Inc.

B. Proposed Class III Landfill

An Environmental Impact Statement/ Environmental Impact Report (EIS/EIR) was completed in June, 1992 under the lead of the U.S. Department of the Interior Bureau of Land Management and the County of Riverside Planning Department. As noted in the June 1992 final EIS/EIR, Section 1, page 1-2, for the Eagle Mountain Landfill Project:

The "Eagle Mountain open pit iron ore mine was operated by Kaiser Steel Corporation until 1983. Three large open pits (approximately one to two miles long) were excavated during Kaiser's operations at the Eagle Mountain Mine. These are named the Black Eagle Pit (westernmost), Central Pit, and East Pit (formerly known as the North-South Pit). The past mining activities have resulted in the creation of significant stockpiles of spoils material on the site. Mine Reclamation Corporation has leased approximately 8,300 acres of the former Eagle Mountain mine from Kaiser Steel Resources, Inc. for a period of 100 years. MRC proposes to develop approximately 4,684 acres of this property to operate a Class III nonhazardous sanitary landfill, of which 2,262 acres would contain the landfill itself. The East Pit, which is proposed for use for landfilling, is approximately two miles long and in an east-west direction, 2,000 feet wide north to south, and 400 to 800 feet deep. The proposed action will involve a land exchange between BLM and Kaiser Steel Resources, Inc. and the conversion of the existing 52-mile Kaiser railroad right-of-way and Eagle Mountain Road right-of-way to new FLPMA rights-of-way. The Kaiser railroad would be reactivated to allow rail transport to the site." (Please see map Attachment 10 showing the landfill "footprint" superimposed on the mine site.)

"Hazardous waste" generated at this site included grease, diesel fuels, oils, solvents, and PCBs from decommissioned transformers. Other "non-hazardous solid wastes" included overburden, coarse tailings, fine tailings and demolition debris such as scrap metal, wood, and piping. (Please see Section IV-B of this report for regulatory definitions.) During the decommissioning period between 1983 and 1987, Kaiser entered into contract with numerous

vendors for surplus equipment selling, and dismantling and demolition of the mine infrastructure. Kaiser currently continues to operate a fleet of vehicles which generate hazardous waste, such a waste oil and solvents, from routine vehicle maintenance. Hazardous wastes are characterized before shipping, and are sent off-site via registered hazardous waste haulers under hazardous waste manifests.

IV. Regulatory Status of Site

A. "Hazardous Waste Generator" Classification - Kaiser Resources, Inc.

In terms of waste generation and disposal regulatory jurisdiction at the facility, Kaiser was and continues to be a hazardous waste generator and a mining solid waste disposal site. Hazardous waste generators are typically regulated by local agencies such as Riverside County Environmental Health Services as authorized under a Memorandum of Understanding (MOU) with the DTSC. Solid waste disposal facilities are regulated by Regional Water Quality Control Boards, the Local Enforcement Agencies, and the California Integrated Waste Management Board.

B. Regulatory Definitions (Please see Attachments for excerpts from Health and Safety Code and title 22, Cal. Code Regs.)

1. "Hazardous Material" is defined in the California Health and Safety Code (HSC) section 25501(k) as any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. "Hazardous materials" include, but are not limited to, hazardous substances, hazardous waste, and any material which a handler or the administering agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.

2. "Hazardous waste" is defined in HSC section 25117 as either of the following:

> "(1) A waste, or combination of wastes, which because of its quantity, concentration, or physical, chemical, or infectious characteristics may either:

(A) Cause, or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness.

(B) Pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported, or disposed of or otherwise managed.

(2) A waste which meets any of the criteria for the identification of a hazardous waste adopted by the department pursuant to Section 25141."

3. The "criteria" for the identification of a hazardous waste adopted by the department are found in title 22, Cal. Code Regs. section 66261 et seq., and include toxicity, reactivity, ignitability, and corrosivity.

4. During 1980 to 1989, the U.S. Environmental Protection Agency (U.S. EPA) Office of Solid Waste Mining Waste Section went through a rulemaking process to study those mining wastes which needed to be regulated as hazardous wastes and which could feasibly be regulated as such. U.S. EPA concluded that extraction, beneficiation and 20 specified mineral processing waste streams did not need to be regulated as hazardous waste. U.S. EPA found those wastes were high volume, low toxicity and low mobility wastes. U.S. EPA also specified that in the event that mining wastes from a mining operation did contaminate drinking water sources, the mining operation must cease, and the mine site be remediated under the requirements of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).

Wastes from the "extraction, beneficiation and mineral processing" of ores and minerals which are not regulated under the federal Resource Conservation and Recovery Act (RCRA) Subtitle C (hazardous waste, see Attachment 16, 40 CFR 261.4(b)(7)) are also exempt from the California hazardous waste statutes and regulations (Attachment 17, HSC section 25143.1(b)). Such wastes are regulated as solid wastes by the Regional Water Quality Control Board under the provisions of title 23, Cal. Code Regs. HSC section 25143.1(b)(3)(A) defines wastes from the extraction, beneficiation and mineral processing as follows:

"(i) Soil, waste rock, overburden, and any other solid, semi-solid, or liquid natural materials that are removed, unearthed, or otherwise displaced as a result

of excavating or recovering an ore or a mineral.
(ii) Residuals of ores or minerals after those ores or minerals have been removed, unearthed, or otherwise displaced from their natural sites and physically or chemically treated or otherwise managed in order to separate or concentrate the commercial product present in the ore or mineral, or processed to produce a final marketable product."

5. "Maximum Contaminant Level" (MCL) is described by title 22, California Code of Regulations (Cal. Code Regs.) section 64473(a) as follows:

"Distribution system water containing substances exceeding the maximum contaminant levels shown in Tables 6 and 7 may be objectionable to an appreciable number of people, but is not generally hazardous to health."

MCL's from Table 6 of constituents tested for as part of this investigation:

copper.....1.0 mg/l
zinc.....5.0 mg/l

6. Fine Tailings Pond

The fine tailings are "beneficiation" wastes and therefore not subject to hazardous waste regulation. The fine tailings are regulated by the Colorado River Regional Water Quality Control Board (RWQCB) under title 23, Cal. Code Regs. The fine tailings ponds have been "certified closed" by the RWQCB.. In order for the RWQCB to certify the ponds "closed", the facility had to undergo a "closure" process, and prove to the RWQCB that the ponds had not contaminated the groundwater by means of the prescribed data/analysis from water sampling and soil sampling. The facility is currently in the 30-year post-closure monitoring program to ensure that the ponds will not contaminate groundwater in the future.

MRC has drilled and sampled 15 monitoring wells around the proposed landfill site. The monitoring data shows that the groundwater is high in total dissolved solids, sodium and fluorides, none of ~~of high~~ are hazardous waste constituents. ~~which~~ which

7. During the active mining period, Kaiser Steel, Inc. used radioactive gauges ("sources") to monitor ore on

conveyor belts. During the decommissioning process, Kaiser dismantled the gauges. According to information provided to DTSC by Department of Health Services Radiologic Health Branch, the disposal process met all regulatory requirements.

V. Contacts with Other Agencies and Preparatory Meetings

Background information on this site was gathered from the USDI BLM, RWQCB, CIWMB, Riverside County EHS, DHS-Rad Health.

A preparatory meeting was held with interested parties on February 9, 1994 at the U.S. Department of the Interior's BLM office in Palm Springs. During the meeting, KRI representatives described the history of the mining operations and site clearance and environmental activities. Riverside County staff described the county's involvement and showed a video of the mine site. The complainants discussed their concerns. MRC personnel presented maps showing the proposed landfill footprint, explaining which areas of the mine fell within and outside the footprint. Finally, the Department's staff discussed the proposed investigation and tour sequence, and explained the Department's sampling techniques. Site safety measures and logistics were discussed. KRI reserved their rights as operator to limit site access to three complainants and agency representatives and to two additional members of the public.

IV. Observations

On February 10, 1994, representatives of various private organizations and public agencies met at the Kaiser Resources, Inc. office at the Eagle Mountain Mine to conduct a tour and sampling exercise at the Eagle Mountain Mine. These representatives were as follows:

Concerned Citizens of the Chuckwalla Valley (CCV)

Larry Charpied
Donna Charpied
Lowell Ball

Kaiser Resources, Inc. (KRI)

Gerry Fawcett, Executive Vice President
Rob Hartman, Environmental Projects Manager

Mine Reclamation Corporation (MRC)

Orlo Anderson, Mine Superintendent
Gary Johnson, Vice President
Kaiser Jan Roberts, Director of Eagle Mountain Operations

Bureau of Land Management (BLM)

John Key, Senior Hazmat Coordinator
Verla Harle, Realty Specialist
Don Stager, Ranger

Riverside Environmental Health Services (RCEHS)

John Fanning, Director
Joe Asbury, Inspector
Laurie Holk, Sanitarian

California Integrated Waste Management Board (CIWMB)

David Otsubo, Associate Waste Management Specialist

Members of the Community

Noel Brush
Lester Wilson

Department of Toxic Substances Control (DTSC)

Sharon Fair, Senior Hazardous Materials Specialist
Richard Hubbell, Associate HMS
Mark Fuentes, HMS
Chris Guerre, Associate Engineering Geologist
Bill Owens, AEG

After a brief organizational discussion, the group divided up into different vehicles and we started the tour. We drove to the extreme western border of the proposed landfill where we surveyed a location known as the Central Pit Fueling Station.

A. <u>Central Pit Fueling Station</u>

The Central Pit Fueling Station was a two-level area. Ten above-ground tanks were located on the upper level; all of the tanks were empty. These tanks had been used to store solvents, diesel, and hydraulic fluids. We surveyed the upper area; observed no surface soil contamination was observed. On the lower level, we observed some surface soil contamination at the service station site. According to Rob

Hartman, KRI already has plans to remediate the site. Most of the staining appeared to be diesel which is typically non-hazardous. We took no samples since this was an area that KRI already had identified to remediate and the extent of contamination appeared to be limited. (Photos 1-6)

B. Underground

Next, we proceeded to the Underground, which was an underground mining operation. The Underground was 3,800 feet long, and consisted of two parallel tunnels, joined at the far end. About 14 members of the tour group drove through the Underground, riding in two vans supplied by MRC. We stopped at a civil defense shelter in the Underground. The shelter had empty water drums, food rations and various of survival supplies. We observed no hazardous waste in the shelter or anywhere else in the underground.

The Underground did have an upper level which was blocked off to vehicular traffic by cave-ins. According to Rob Hartman, the air in the upper level has an oxygen level less than 19.5%. Such conditions require using self-contained breathing apparatuses and obtaining a "Confined Space Entry Permit" from Cal-OSHA, so we decided not to enter that portion of the Underground. We concluded that if the area was closed to vehicular traffic it would be unlikely that anybody would have been able to dispose of any hazardous waste in the upper level. (Photo 7)

When we exited the underground, we walked to a former explosives magazine, which was northeast of the Underground entrance. I observed that the magazine was completely empty. Larry Charpied and Lowell Ball discovered thick waste grease which had been disposed along the side of the road between the underground and the explosives magazine. They showed me the location and I observed that the area covered 2 to 3 square feet and consisted of surface staining with grease. (Photos 8-10)

C. 9% Grade, Shovel Area and Eagle Creek Wash

The 9% Grade Shovel Area was the next place that we inspected. According to Mr. Ball, large electric shovels were serviced in the area, where the waste oil, grease and solvent would be disposed to the soil. I asked him to suggest specific locations where we could sample. Mr. Ball said that the wastes had been disposed of all over place and we would likely find contaminants anywhere we sampled.

Mark Fuentes sampled the soil on the south side of the 9% Grade road and east of an electric shovel near a gravel pile. Mr. Fuentes dug a hole 10 inches deep with a shovel and scooped out the samples with a disposable plastic scoop. Mr. Fuentes collected three co-located samples from this hole. The samples were placed into jars, sealed with evidence tape and labeled. The samples were given identified as "SH-1-A", "B", & "C". DTSC retained custody of the "A" & "C" samples and Rob Hartman of KRI took custody of the B sample. Mr. Charpied signed the evidence tape on their "C" sample. We followed this system of chain of custody for the remainder of the two-day sampling exercise, with either Larry or Donna Charpied signing the evidence tape on their samples. (Photos 11 & 12)

Next, we observed an area of dead grass down in the Eagle Creek wash just below the shovel area. Bill Owens surveyed the area with the magnetometer, which is a device for locating buried iron or steel objects. Mr. Owens was attempting to discover if any steel drums had been buried in the area of the dead grass,but he found nothing to indicate the presence of any buried drums. Rani Patole surveyed the area of the dead grass with an Hnu photo-ionization detection meter and detected no organic vapors. Mark Fuentes took three co-located soil samples from a 10 inch deep hole within the area of dead grass. These samples were labeled "EC-1-A", "B", & "C". (Photos 13 & 14)

We then went to the north side of the road and took three more co-located soil samples from a 6 inch deep hole. The samples were identified as "SH-2-A", "B", & "C". The "B" sample was given to Rob Hartman and we kept the "A" and "C" samples. (Photos 15 & 16)

D. <u>Metallurgical Laboratory</u>

The next site that we investigated was the Metallurgical Laboratory. The Lab was used for assaying iron ore samples during the time when ore was being actively mined. The Lab had been inactive since 1982, and had been partially dismantled. During the walk-through, I observed reagent bottles and containers of naphtha solvent, 2-propanol, sodium thiosulfate powder, sodium sulfite and paint. Although these containers appeared to be in good condition, and the materials contained in them appeared to be usable product, I suggested to the KRI representatives that these be properly disposed.

E. Beneficiation Plant Area

We went to the site of the former Beneficiation Plant. The Plant had been demolished. According to Larry Charpied, a fire occurred in the Beneficiation Plant in July 1989 and during the course of the fire transformers containing PCBs had burned. Mr. Charpied had learned this information from prison inmates who had been called in to fight the fire. Inspector Joe Asbury of RCEHS confirmed that the fire had occurred as Mr. Charpied claimed.

Joe Asbury had also responded to the fire and was the individual who had discovered the PCBs at the fire. Joe Asbury oversaw the clean-up of the burned plant. RCEHS required the facility to clean the site. The clean-up standard for PCB contamination was "non-detect" (i.e. the contaminant concentration was lower than the ability of any chemical analytical method to detect and therefore presumably totally absent).

The fire was confined to the structure of the Beneficiation Plant. The Beneficiation Plant had been demolished since the fire. The Plant had been a steel structure; the steel was scrapped and sent to a metal recycler. Since the building no longer existed, it was agreed that there was nothing left to sample.

F. Fine Crusher

According to Lowell Ball, when the Fine Crusher was being demolished, a transformer containing PCBs was damaged and spilled PCBs to the ground. Kaiser's Gerry Fawcett concurred that the spill had occurred, but stated the site had been remediated and tested. Based on this information we decided that there was nothing at that site left for us to sample.

G. Scrap Staging Area

Next we went to the Scrap Staging Area. This area had been used to stage scrap metal and drums of material, prior to being shipped off-site for disposal or recycling. In this, area we observed several areas of surface staining. Mark Fuentes collected 3 co-located samples from an area of the surface staining. The samples were identified as "SC-1-A", "B", and "C". We gave the "B" sample to Rob Hartman and we kept the "A" & "C" samples. (Photos 17 & 18)

H. Main Shop Fueling Area (MSFA)

We then proceeded to the wash adjacent to the MSFA. John Fanning and I discovered what appeared to be a pile of course sand and gravel which was contaminated with a viscous petroleum hydrocarbon material. We also discovered what appeared to be a piece of a rusty drum, and more petroleum hydrocarbon staining. Mr. Fanning and I observed what appeared to be recent backhoe teeth marks in the location of the rusty drum piece. We also observed what appeared to be backhoe tracks in the same area. (Photos 19-26)

On the north side of the wash opposite the contaminated dirt pile, Mr. Fanning and I observed an area where some kind of hydrocarbon material appeared to have leaked from a tank and flowed down the bank of the wash. The material was dried and cracked giving the appearance that it had been spilled several years previously. Mr. Fanning and I climbed up the bank of the wash to trace the flow of the hydrocarbon material. On top of the bank where the hydrocarbon staining ended, we observed a circular excavation, which appeared to have been the location where a tank had been. We were unable to determine what the former tank had contained. We took no samples since laboratory analysis of such hydrocarbon materials typically shows them to be non-hazardous. (Photos 27-30)

I. Container Storage Area

We went to the hazardous waste container storage area (CSA). The CSA was located in the main vehicle maintenance shop. We observed small tanks and containers for accumulating waste oil and decommissioned electrical transformers for time periods less than 90 days. The area was bermed and lined with plastic tarps. These wastes were generated by ongoing vehicle maintenance and decommissioning of electrical transformers.

The CSA was the last location of the day that we inspected.

On February 11, 1994, we returned to the Eagle Mountain Mine to resume the sampling exercise.

J. Coarse Tailings Pile

The first location of the day we went to on the second day was the Coarse Tailings Pile. It was alleged that the coarse tailings were contaminated with hazardous constituents but were also being used to make asphalt as a

means of disposal. We went to the location where coarse tailings, destined to be made into asphalt, were being loaded into trucks. We observed no visible signs of contamination. I observed that the coarse tailings material was gravel, having the same visible characteristics as gravel-aggregate which is typically used for making asphalt. Mr. Charpied, Mr. Fanning and I agreed there was not enough evidence of any contamination to warrant taking a sample of the coarse tailings.

Mr. Fawcett said that the county road department had been buying the coarse tailings for years for use in making asphalt. Mr. Fawcett also said that the coarse tailings pile consisted of approximately ~~400,000~~ tons of gravel material. 1,000,000 -> check w/ G. Faw

K. Fine Tailings Pond

We then proceeded to Fine Tailings Pond #6. Mr. Charpied selected a sampling location, and requested that we take a sample from a depth of approximately 12 inches. I used a hand auger to bore a hole to that depth. Using the hand auger, we collected 3 co-located samples from the requested depth. The samples were identified as "FTP-1-A", "B" & "C". I gave the "B" sample to Rob Hartman and retained custody of the "A" & "C" samples.

L. East Pit Storage Yard

The next site we inspected was the East Pit Storage Yard (EPSY). The EPSY had been used as a scrap and demolition debris accumulation area. I observed rubber conveyor belts, wood pallets, empty metal cans, and bits of scrap metal scattered around. According to Mr. Ball, waste oil and solvents had been disposed to the ground in the site. I asked him where the solvents and oil had been disposed. Mr. Ball said that the solvents and oils had been disposed all over the EPSY, and that one site was as representative as another. I chose a relatively rock free location for ease of sample collection. Mark Fuentes dug a 6 inch hole and collected three co-located samples. These samples were identified as "EPS-1-A", "B" & "C". I gave the "B" sample to Mr. Hartman and I retained custody of the "A" & "C" samples. (Photo 31)

M. East Pit Overburden Pile

We then walked over to the East Pit Overburden Pile (EPOP). Larry and Donna Charpied had discovered empty drums around the perimeter of the pile on a previous visit. I

observed that these same drums were empty. I observed no soil staining in the area of the drums. At one point, Joe Asbury and I observed a buried metal drum, which had been exposed by water erosion up on the side of the pile. Mr. Asbury and I climbed up the side of the pile to investigate the drum more closely. When we reached the drum, we observed that it was empty and had no residue inside. We then climbed up to the top of the pile. (Photo 32)

When we reached the top of the pile, we observed two trenches. Mr. Asbury informed me that they were two of the burn pits which the facility had used for burning trash and debris. We postponed any sampling until later in the afternoon.

N. Core Garden

We then proceeded to the vicinity of what is known as the Core Garden where rock core sample from the mine were stored in drums and in rows on the ground. Mr. Charpied's informant had made a map indicating that hundreds of barrels of waste had been buried at the terminus of the road leading to the Core Garden. According to Mr. Charpied, 200 barrels had been excavated in December, 1993, and several more hundred barrels had been reburied. We observed no hazardous waste, nor disturbed soils in the area of the Core Garden. Mr. Charpied investigated the area around a monitoring well which was a quarter mile north of the Core Garden, but he found no sign of any excavation in that area which was suggestive of buried drums.

O. Jenkinsville Site

We then proceeded to the Jenkinsville site. This had been a heavy equipment fueling and maintenance operation. Thirty to 40 pickup trucks and 20 flatbed trucks had been serviced here, including the Jenkins Truck which held 500 tons when fully loaded. The equipment maintenance site ceased operations in 1982 when the active mining operations ceased. At the fueling station, I observed a large area where some sort of petroleum hydrocarbon material had spilled onto the ground. The spilled material appeared to be dried out and cracked, indicating that it had been exposed to the weather for several years. (Photos 33-35)

P. Open Burn Pits

The final site that we inspected was the Open Burn Pit area located on top of the East Pit Overburden Pile. We observed ~~two~~ 3 open trenches which were oriented in an east-

west direction, and ~~six~~ 4 closed pits. Two of the previously closed pits had been partially reopened at the direction of RCEHS. Mark Fuentes collected two sets of three co-located soil samples from the trenches. The samples taken from the southern trench were identified as "OBP-1A", "1B", & "1C" and the samples taken from the northern trench were identified as "OPB-2A", "2B" & "2C". The samples were sealed with evidence tape. The "B" samples were given to Rob Hartman. The Charpieds signed the "C" samples evidence tape. I retained the "A" & "C" samples.

V. Sampling and Chain of Custody

Nine sets of three co-located soil samples were taken from the Shovel Storage Area, Eagle Creek Wash, Scrap Staging Area, Main Shop Fueling Area, Fine Tailings Pond, East Pit Storage Area, and Open Burn Pit.

All the "A" & "C" samples were placed in an ice chest, which I kept in the DTSC utility truck. At the end of the sampling operations, I drove the truck back to Long Beach. The truck was kept at my residence over the weekend. On Tuesday, February 15, 1994, I delivered the "A" samples to the DTSC Southern California Laboratory at 1449 Temple Street, Los Angeles. The samples were received by Janice Wakakuwa, who signed the chain of custody form. I retained custody of the "C" samples, and returned the "C" samples to my cubicle at 245 West Broadway, Long Beach. On February 17, 1994, I delivered the "C" samples to the E. S. Babcock & Sons Laboratory at 6100 Quail Valley Court, Riverside per the instructions of Mr. Charpied. The samples were received by Gail Traynor. The samples had remained chilled and sealed until they were received by the laboratory.

These samples were analyzed for pH, metals, semi-volatile organic constituents, volatile organic constituents, and PCBs based on the suspected hazardous waste that may have been disposed at each of the locations. According to laboratory analytical results, no hazardous waste constituents were detected in any of the samples with the exception of native heavy metals which were all well below the regulatory levels for toxicity. Sample EC-1-C showed very low levels of toluene and isopropyl toluene, and SC-1-C showed very low levels of n-butylbenzene, sec-butylbenzene, 1, 2, 4-trimethylbenzene and 1, 3, 5-trimethylbenzene for which there are no regulatory levels for being hazardous. The pH of the samples ranged between 6.1 and 7.4. A complete listing of locations, analytical parameters, and results is included in the Attachments.

III. Conclusions

Samples were taken from soils at levels ranging from 3 to 15 inches, which should be at sufficient depth to detect levels of volatile and semi-volatile organic compounds, heavy metals and PCBs. Results of the analyses do not indicate the presence of hazardous constituents above regulatory levels or thresholds for waste oil, solvents, acids, bases, heavy metals, PCBs, or industrial organic chemicals. Toluene + isopropyl toluene

Based on the sampling results and direct observations of the specified locations, the Department cannot find evidence to support the allegations that hazardous waste was disposed at the facility in sufficient quantities or with toxic characteristics so as to noticeably impact the environment, or to warrant a formal enforcement action against the facility. All of the potential hazardous waste disposal sites which were identified are located outside of the proposed landfill footprint. All the alleged sources of the hazardous wastes were from mining operations and processes that have not operated for over ten years. Based on this information, the environmental viability of this site as a Class III solid waste landfill and any potential hazardous waste disposal are independent issues.

The highest concentration of any hazardous constituent found in the tailings pond was approximately 600 mg/kg of copper. The California hazardous regulatory level for copper is 2,400 mg/kg total copper. Copper is not a federal RCRA hazardous constituent. The highest concentration of copper found in the fine tailings pond monitoring wells is 0.09 mg/l and typically the copper values are much lower. In the worst case, the copper concentration is only 10% of the "objectionable" standard for water quality. These findings corroborate U.S. EPA's rulemaking findings that beneficiation wastes are typically low toxicity and low mobility waste streams.

See EIR Vol 2 20 years ago

Neither the analytical results nor the regulatory status of the fine tailings material would preclude it from being used as Class III landfill liner material. The current fine tailings ponds disposal sites were constructed to a lower environmental protection standard than were the proposed landfill; also, the tailings ponds held much more water than will be allowed into the landfill. Despite these two factors, the tailings ponds did not contaminate the groundwater. Therefore, it would seem unlikely that the fine tailings would contaminate the groundwater if they were used to line the proposed landfill.

Analytical Results

Sample ID & Location	Sample Type	Analytical Parameters	Results
SH-1-A Shovel area south	Soil	Metals 6010 Semi-volatiles pH	 all ND* 6.9
EC-1-A Eagle Creek Wash dead grass shovel area	Soil	Metals 6010 Semi-volatiles 8270 pH	 all ND* 7.2
SH-2-A Shovel area north	Soil	Metals 6010 Semi-volatiles 8270 pH	 all ND* 6.8
SC-1-A Scrap staging area	Soil	Metals 6010 Semi-volatiles 8270 pH	 all ND* 6.9
SC-2-A Main shop fueling area	Soil	Metals 6010 Semi-volatiles 8270 pH	 all ND* 6.1
FTP-1-A Fine Tailings Pond	Soil	Metals 6010 Semi-volatiles 8270 pH	 all ND* 7.2
EPS-1-A East Pit Storage Area	Soil	Semi-volatiles 8270 volatiles 8240 pH	all ND* ND 7.3
OBP-1-A Open Burn Pit	Soil	Semi-volatiles 8260 volatiles 8240 pH PCB's 8080	all ND* ND 7.0 ND
OBP-2-A Open Burn Pit	Soil	Semi-volatiles 8260 Volatiles 8240 pH PCB's 8080	all ND* ND 7.4 ND

C 8240

Cu mg/kg	Pb mg/kg	Mo mg/kg	Ni mg/kg	Se mg/kg	Ag mg/kg	Th mg/kg	V mg/kg	Zn mg/kg	Hg mg/kg
290 200	76.1 46	<3.75 ND	15.9 15	<7.50 ND	NA ND	<15.0 ND	16.6 5.3	177 110	NA 0.21
108 120 120	23.4 25 16	<3.75 ND ND	17.5 18 20	<7.5 ND ND	NA ND ND	<15 ND ND	43.5 30 33	129 130 140	NA 1.9 0.5
242 170	54.2 30	<3.75 ND	11.4 9.5	<7.5 ND	ND	<15.0 ND	17.6 7	264 200	NA 0.2
52.5 72 66	11.4 9.5 ND	<3.75 ND ND	9.95 8.9 11	<7.5 ND ND	ND ND	<15.0 ND ND	26.2 11 12	67.7 50 69	NA 1.0 ND
273 340	68.1 38	<3.75 ND	18.9 13	<7.5 ND	ND	<15.0 ND	23.5 12	487 410	NA 0.56
605 530 570	96.1 34 73	<3.75 ND ND	21.3 19 25	<7.5 ND 22	ND ND	<15.0 ND ND	17.5 9.7 ND	386 310 370	NA .63 ND
26.9	6.70	<3.75	8.92	<7.5	NA	<15.0	34.7	30.9	NA
429 190 300	46.6 38 34	<3.75 ND ND	27.6 14 ND	<7.5 ND ND	ND ND	<15.0 ND ND	29.2 9.5 12	166 140 270	NA .35 ND
240	51	ND	13	ND	ND	ND	6.9	180	ND
2,500	1,000	3,500	2,000	100	500	700	2,400	5,000	20
25	5	350	20	1.0	5	7.0	24	250	0.2
251.82	48.18	<3.75	16.05	<7.5	ND	<15	23.97	209	NA

VIII. Attachments

1. Sampling Plan
2. Sample Analysis Request and Chain of Custody Form for DTSC samples
3. Sample Analysis Report for pH analyses
4. Sample Analysis Report for PCBs
5. Sample Analysis Report for semi-volatiles
6. Chain of Custody Form for Charpied samples
7. Results of Magnetometer Profiles, memo
8. Photos
9. Sample Analysis Report for Metals
10. Landfill "Footprint" Map
11. HSC 25501(k)
12. HSC 25117
13. HSC 25141
14. title 22, Cal. Code Regs., section 66261
15. Federal Register Sept. 1, 1989
16. 40 CFR 261.4(b)(7)
17. HSC 25143.1(b)
18. title 22, Cal. Code Regs., section 64473
19. Mailing List

Richard Hubbell
Richard Hubbell
Associate Hazardous Materials Specialist
Surveillance & Enforcement Branch

4/7/94
Prepared Date

Sharon Fair
Sharon Fair
Unit Chief
Surveillance & Enforcement Branch

4/7/94
Date Reviewed

COUNTY OF RIVERSIDE • HEALTH SERVICES AGENCY
DEPARTMENT OF ENVIRONMENTAL HEALTH

December 16, 1993

State of California
Department of Toxic Substances Control
Sharon Fair, Unit Chief
245 West Broadway, Suite 350
Long Beach, CA 90802

RE: Joint Facility Inspection - Eagle Mountain Mine/Kaiser Steel Resources Desert Center

Dear Ms. Fair:

The Riverside County, Health Services Agency, Department of Environmental Health requests your participation in a joint site evaluation for the purpose of determining if any hazardous waste has been improperly disposed of at the proposed regional landfill project known as Eagle Mountain Mine, Desert Center, California

Your Department will be provided with all of the documentation and allegations relating to this issue to date. I believe that it would be appropriate to have a pre-site work plan for the on-site review. We are developing a preliminary work plan and will fax this draft plan to your office for review and comment. It is anticipated that the first week in January will be the target date for the on-site inspection.

I have communicated with your office this date and spoke to Ms. Sue Hakiem regarding this request. She has advised me that you would be the person coordinating CAL-EPA Toxics' participation on this project. I have also contacted the Region 3 Toxics office to request the assistance of Mr. Dennis Dickerson, Ombudsman. I realize that Mr. Dickerson is out of the Region 3 office, however, in the absence of Mr. John Hinton, Ombudsman from your office, Dennis has agreed to participate.

[illegible] Director
[illegible]

Thank you in advance for your assistance in this matter I am trying to set up a meeting early next week to review and coordinate the work plan

Sincerely,

John M. Fanning

John M Fanning, Director
Department of Environmental Health

JMF rz

cc Kenneth B. Cohen, Director, Health Services Agency
Dennis Dickerson, Region 3 Toxics
Margaret Szczepaniak, Assistant Public Health Administrator, Special Services
Larry Parrish, County Administrative Officer
Gerry Fawcett, Kaiser Resources, Inc.

ATTACHMENT 1

SAMPLING PLAN

Eagle Mountain Mine
(EMM)
Desert Center, CA 92239
EPA ID# CAD003934890

Date of Plan: February 3, 1994
Expected Date of Sampling: February 10 & 11, 1994

I. Purpose

The purpose of this sampling operation is to identify hazardous waste streams disposed at the EMM site.

II. Items to be Sampled

The following items will be sampled:

	Location	Sample Type	Parameters
A.	"Jenkinville" site	Soil	TPH metals
B.	Car Trench	Soil	solvents, semi-volatiles, PCB's
C.	Pit Dump	inaccessible site	
D.	Scrap Yard	Soil	TPH metals
E.	Main Shop drain	sludge/soil	PCB's
F.	9% Equipment storage	Soil	TPH metals
G.	"Lay-Down" area	Soil	TPH, solvent metals
H.	Coarse Tailings/asphalt	Soil	TPH, solvents PCB's

(Site Map Attached)

III. Sampling Team:

Richard Hubbell, DTSC, SEB, Site Safety Officer and Lead Sampler
Mark Fuentes, Sampler
Chris Guerre, Documenter
Sharon Fair, Supervisor

IV. Equipment:

A. Safety Equipment:

1. Poly tyvek coveralls, large
2. Safety goggles
3. Hard hats
4. Nitrile gloves
5. Respirators
6. GMC-H respirator cartridges

7. Boots
8. Duct tape
9. Drinking water
10. Hudson sprayer for decon
11. Kimwipes
12. Hand cleaner, waterless
13. Water jugs
14. Water canteens
15. Binoculars
16. Cotton Gloves
17. Ludlum Radiation Meter
18. Hnu

B. Sampling Equipment:

1. Hand auger with trap door
2. Wide mouth sample jars, 48
3. Marking board
4. Dry erase marker
5. Sharpie marker
6. Card table
7. Ice chests, 2X
8. Scoops
9. Camera
10. Film
11. Teflon scoops
12. Round Point Shovel

VI. Sampling Procedures

All locations visited by the sampling team will be surveyed for radiation prior to any work being performed.

A. "Jenkinville" site

The site will be visually surveyed for surface oil stains and also it will be surveyed for any vapors using a photoionization detector (Hnu). Areas of surface staining will be sampled using teflon scoops. If there is evidence of recent soil disturbance in locations suspected of contamination soil will be sampled using the auger and checking for vapors in the borehole.

B. Car Trench

The site will be visually surveyed for surface oil stains and also it will be surveyed for any vapors using a photoionization detector (Hnu). Areas of surface staining will be sampled using teflon scoops. If there is evidence of recent soil disturbance in locations suspected of contamination soil will be sampled using the auger and checking for vapors in the borehole. This area will be surveyed using a magnetometer to locate areas where drums may have been buried.

C. Pit Dump Inaccessible

D. Scrap Yard

The site will be visually surveyed for surface oil stains and also it will be surveyed for any vapors using a photoionization detector (Hnu). Areas of surface staining will be sampled using teflon scoops. If there is evidence of recent soil disturbance in locations suspected of contamination soil will be sampled using the auger and checking for vapors in the borehole.

E. Main Shop drain

The sampling team will try to determine where the drain led to and sample that location. Any visible contamination in the drain area will be sampled using a scoop to collect the sample. The site will be visually surveyed for surface oil stains and also it will be surveyed for any vapors using a photoionization detector (Hnu). Areas of surface staining will be sampled using teflon scoops. If there is evidence of recent soil disturbance in locations suspected of contamination soil will be sampled using the auger and checking for vapors in the borehole.

F. 9% Equipment storage

The site will be visually surveyed for surface oil stains and also it will be surveyed for any vapors using a photoionization detector (Hnu). Areas of surface staining will be sampled using teflon scoops. If there is evidence of recent soil disturbance in locations suspected of contamination soil will be sampled using the auger and checking for vapors in the borehole.

G. "Lay-Down" area

The site will be visually surveyed for surface oil stains and also it will be surveyed for any vapors using a photoionization detector (Hnu). Areas of surface staining will be sampled using teflon scoops. If there is evidence of recent soil disturbance in locations suspected of contamination soil will be sampled using the auger and checking for vapors in the borehole.

H. Coarse Tailings/asphalt

The site will be visually surveyed for surface oil stains and also it will be surveyed for any vapors using a photoionization detector (Hnu). Areas of surface staining will be sampled using teflon scoops. If there is evidence of recent soil disturbance in locations suspected of contamination soil will be sampled using the auger and

checking for vapors in the borehole. The pile will also be surveyed using a magnetometer to locate buried drums.

VII. Special Safety Considerations

1. Ionizing Radiation

It has been alleged that radioactive sources may have been disposed at the site. The work areas will be surveyed using a Ludlum radiation meter. Any locations having greater than .05mREM/hour will be noted and the survey team will evacuate to areas with less than .05mREM/hour. Radioactive areas will be referred to the Department of Health Services Radiologic Health Branch for follow-up.

2. Chemical Hazards

The main chemical hazards would be solvents, waste oil, and PCB's which samples may inhale or come in contact with when handling the samples. Gloves, chemical resistant boots, and Tyvek will be used to prevent physical contact with the samples. The Hnu will be used to survey work areas to identify areas where solvent vapors may be present. In those areas, the sampling team will wear full face respirators equipped with GMC-H cartridges to prevent inhalation of solvent vapors.

Local sources of drinking water contain high levels of arsenic, fluoride and nitrate. The sampling team will be required to bring fresh drinking water.

3. Deconning

The sampling sites are generally not supplied with sources of fresh water for washing boots and respirators. A Hudson sprayer will be brought to each sampling site for deconning the respirators. The boots will be protected by disposable boots covers to minimize the need for washing them.

VIII. Attachments

A. Facility and hospital location map
B. Lab analysis request form
C. HARP
D. Chain of custody form

Richard Hubbell
Richard Hubbell
Associate Hazardous Materials Specialist
Surveillance & Enforcement Branch

2/1/94
Prepared Date

Sharon Fair
Unit Chief
Surveillance & Enforcement Branch

2/2/94
Date Reviewed

ATTACHMENT 2

State of California Health and Welfare Agency

Department of Health Services
Hazardous Materials Laboratory

HAZARDOUS MATERIALS SAMPLE ANALYSIS REQUEST

1. Authorization Number: S C J 2 0 2 1

HML No. To

2. Page 1 of

3. Requestor: Rich Hubbell, DTSC
Address (To Receive Results): 245 W. Broadway #425, Long Beach CA 90802

4. Phone (8) 435-5920

5. Priority [2]
a. Authorized by

6. Date Sampled 2/10+11/94

7. Time Sampled • Hours

8. Codes (fill in all applicable codes)

a. STC	3 0 8 0
b. Region	0 4
c. TPC	
d. INDEX	6 4 1 0
e. PCA	3 6 3 2 0
f. SITE	
g. County	0 3 3

9. Activity: [x] SEB [ ] SMB [ ] FPB [ ] ATD [ ] PASD [ ] Other

10. SAMPLING LOCATION: C A D 0 0 3 9 3 4 8 9 0

a. EPA ID No.

b. Site: Eagle Mountain Mine

c. Address: Eagle Mtn Mine, Desert Center 92239
Number Street City Zip

11. SAMPLES

a. ID	b. Collector's No.	c. Lab No.	Sample d. Type	Container e. Type	Container f. Size	g. Field Information
A	SH-1-A	13479	Soil	glass	16oz	Shovel Area
B	EC-1A	13480	"	"	"	Eagle Creek [illegible]
C	SH-2A	13481	"	"	"	Shovel Area
D	SC-1A	13482	"	"	"	Scrap Staging [illegible]
E	SC-2A	13483	"	"	"	Main Shop [illegible]
F	FH-1A	13484	"	"	"	Fine Tailings
G	EP-1A	13485	"	"	"	East Pit Storage
H	CBP-1A	13486	"	"	"	Open Brush [illegible]

12. ANALYSIS REQUESTED

a. [x] pH
b. [x] Metal Scan: A, B, C, D, E, F
c. [ ] Metals (Spec)
d. [ ] W.E.T.
f. [x] PCB: H
g. [ ] VOA-H/S
h. [x] VOA-8240: G, H
i. [ ] VOA-8260
j. [x] SVO-8270: A, B, C, D, E, G, H
k. [ ] Ext. Org (Screening)
l. [ ] Flash Point
m. [ ]
n. [ ]
o. [ ]

13. SUPPLEMENTAL REQUESTS [ ] [ ] [ ] [ ]

Initials
Date

14. CHAIN OF CUSTODY

	Signature	Name/Title	Inclusive Dates
a.	Richard Hubbell	Richard Hubbell AHMS	2/10/94
b.	Janice Wakakuwa	Janice Wakakuwa / PHC III	2/15/94
c.			/ / - /
d.			/ / - /

15. SPECIAL REMARKS:

16. ASSIGNED TO: Date

17. LAB REMARKS:

DHS 6002 (Rev 10/90)

Original Lab • Duplicate File • Triplicate Inspector

State of California Health and Welfare Agency

Department of Health Services
Hazardous Materials Laboratory

HAZARDOUS MATERIALS SAMPLE ANALYSIS REQUEST

1. Authorization Number: S C J 2 0 2 1

HML No. To

2. Page of

3. Requestor: Rich Hubbell
Address (To Receive Results): 245 W. Broadway #175, Long Beach CA 90802

4. Phone (8) 635-5922

5. Priority ☐
a. Authorized by

6. Date Sampled 2/11/94

7. Time Sampled • Hours

8. Codes (fill in all applicable codes)

a. STC	3 0 8 7
b. Region	0 4
c. TPC	
d. INDEX	0 4 1 0
e. PCA	3 6 3 2
f. SITE	
g. County	0 3 3

9. Activity: ☒ SEB ☐ SMB ☐ FPB ☐ ATD ☐ PASD ☐ Other

10. SAMPLING LOCATION: C A D 0 0 3 9 3 4 8 9 0

a. EPA ID No.

b. Site: Eagle Mountain Mine

c. Address: Eagle Mtn Mine, Desert Center 92239
Number Street City Zip

11. SAMPLES

a. ID	b. Collector's No.	c. Lab No.	Sample d. Type	Container e. Type	Container f. Size	g. Field Information
A	OPB-2A	13480A	Soil	glass	1 oz	Open Pan [illegible]
B						
C						
D						
E						
F						
G						
H						

12. ANALYSIS REQUESTED

a. ☐ pH
b. ☐ Metal Scan
c. ☐ Metals (Spec)
d. ☐ W.E.T.
f. ☒ PCB A
g. ☐ VOA-H/S
h. ☒ VOA-8240 A
i. ☐ VOA-8260
j. ☒ SVO-8270 A
k. ☐ Ext. Org (Screening)
i. ☐ Flash Point
m. ☐
n. ☐
o. ☐

13. SUPPLEMENTAL REQUESTS ☐ ☐ ☐ ☐ Initials Date

14. CHAIN OF CUSTODY

a. Richard Hubbell — Signature; Richard Hubbell / AHMS — Name/Title; 2/11/94 — Inclusive Dates
b. Janice Wakakuwa — Signature; Janice Wakakuwa / PHCTII — Name/Title; 2/15/94 — Inclusive Dates
c. Signature; Name/Title; / / - / / — Inclusive Dates
d. Signature; Name/Title; / / - / / — Inclusive Dates

15. SPECIAL REMARKS:

16. ASSIGNED TO: Date

17. LAB REMARKS:

(Rev 10/90) Original Lab • Duplicate File • Triplicate Inspector

ATTACHMENT 3

LABORATORY REPORT
Hazardous Materials Laboratory - Southern California
1449 Temple Street Los Angeles Ca. 90026
Telephone 213-620-3376

To :Rich Hubbell SCL No. ;13479-13486A

Sampling No : see below Date :02/28/94

Sample Location :Eagle Mountain Mine
Eagle Mountain Mine, Desert Center,92237

Analytical Procedures Used : HML 407-S (FOR DRY SOLIDS)
EPA 9045 (FOR THE pH)

Analysis Results

SCL NO.	COLLECTOR'S NO.	% DRY SOLIDS	pH	TEMPERATURE FOR pH °C
13479	SH-1A	96	6.9	22.5
13480	EC-1A	92	7.2	22.5
13481	HS-2	94	6.8	22.5
13482	SC-1A	98	6.9	22.5
13483	SC-2A	98	6.1	22.5
13484	FTP-1A	94	7.2	22.5
13485	EPS-1A	98	7.3	22.5
13486	OBP-1A	98	7.0	22.5
13486A	OPB-2A	98	7.4	22.5

Analyst's Signatures: Supervising Chemist's Signature

Prem S Hira — Date 3/1/94

Janice Wakakuwa — Date 3/1/94

ATTACHMENT 4

LABORATORY REPORT
DEPARTMENT OF TOXIC SUBSTANCES CONTROL
HAZARDOUS MATERIALS LABORATORY - SOUTHERN CALIFORNIA
1449 WEST TEMPLE STREET, LOS ANGELES, CA 90026
TELEPHONE (213) 620-3376

COLLECTOR'S NAME: RICH HUBBELL

SCL NO. : 13486-13486A

DATE REPORTED : 02/2[illegible]/94

SAMPLE LOCATION : EAGLE MOUNTAIN MINE
DESERT CENTER

ANALYTICAL PROCEDURES USED: EPA 8081 GC/ECD FOR ANALYSIS
EPA 3540 SOXHLET EXTRACTION

PCBs ANALYSIS

ANALYTE	SCL NO.	13486	13486A	QUANTITATION LIMIT 13486 13486A
	COL. NO.	OBP-1A	OPB-2A	
	MATRIX	SOIL	SOIL	
	UNITS	MG/KG	MG/KG	
PCB 1016 CAS NO. 12674-11-2		ND	ND	0.5
PCB 1221 CAS NO. 11104-28-2		ND	ND	0.5
PCB 1232 CAS NO. 11141-16-5		ND	ND	0.5
PCB 1242 CAS NO. 53469-21-9		ND	ND	0.5
PCB 1248 CAS NO. 12672-29-6		ND	ND	0.5
PCB 1254 CAS NO. 11097-69-1		ND	ND	0.5
PCB 1260 CAS NO. 11096-82-5		ND	ND	0.5
PCB 1262 CAS NO. 37324-23-5		ND	ND	0.5

Note: ND = NOT DETECTED

QUANTITATION LIMIT =
(CONCENTRATION OF LOWEST CALIBRATION STANDARD) X (DILUTION FACTOR)

SAMPLE PREPARATION:		ANALYST		SUPERVISING CHEMIST
MONINA LIGAO	5/3/94 DATE	MONINA LIGAO	5/3/94 DATE	RUSS CHIN

QUALITY CONTROL (QC) REPORT
DEPARTMENT OF TOXIC SUBSTANCES CONTROL
HAZARDOUS MATERAILS LABORATORY - SOUTHERN CALIFORNIA
1449 WEST TEMPLE STREET, LOS ANGELES, CA 90026
TELEPHONE (213) 620-3376

COLLECTOR'S NAME : RICH HUBBELL — DATE SAMPLE RECEIVED: 02/15/94

SAMPLING LOCATION: EAGLE MOUNTAIN MINE

DESERT CENTER, CA 92237 — DATE SAMPLE PREPARED: 02/16/94 02/18/94

ANALYTICAL BATCH LAB ID NO.: SCL 13486 - 13486A

ANALYTICAL PROCEDURES USED: EPA METHOD 8081 GC/ECD FOR PCB ANALYSIS — DATE SAMPLE ANALYZED: 02/18/94
EPA METHOD 3540 SOXHLET EXTRACTION

QC REPORT FOR

A: METHOD BLANK
B: METHOD STANDARD RECOVERY
C: LABORATORY CONTROL SAMPLE - LCS1187PCB
D: SAMPLE DUPLICATE ANALYSIS

	A	B		C	
		METHOD STANDARD		LABORATORY CONTROL SAMPLE	
COMPOUND	METHOD BLANK mg/kg	RECOVERY %	CONTROL LIMIT %	Found mg/kg	Control limit mg/kg
PCB 1016	<0.5				
PCB 1221	<0.5				
PCB 1232	<0.5				
PCB 1242	<0.5				
PCB 1248	<0.5				
PCB 1254	<0.5				
PCB 1260	<0.5	104	78.8-120	15	11.0 -16.4
PCB 1262	<0.5				

D			
DUPLICATE SAMPLE ANALYSIS Performed on SCL 13486A	Matrix Soil		
	RUN 1	Run 2	RPD
	mg/kg	mg/kg	%
NO DATA	-		
(NO PCBS DETECTED)			
	CONTROL LIMITS		

NDT - NOT DETERMINED YET

SAMPLE PREPARATION — MONINA LIGAO — DATE 3/2/94

ANALYST — MONINA LIGAO — DATE 3/2/94

SUPERVISING CHEMIST — RUSS CHIN — DATE

QUALITY CONTROL (QC) REPORT
DEPARTMENT OF TOXIC SUBSTANCES CONTROL
HAZARDOUS MATERIALS LABORATORY - SOUTHERN CALIFORNIA
1449 WEST TEMPLE STREET, LOS ANGELES, CA 90026
TELEPHONE (213) 620-3376

COLLECTOR'S NAME : RICH HUBBELL

DATE SAMPLE RECEIVED:02/15/94

SAMPLING LOCATION: EAGLE MOUNTAIN MINE

DESERT CENTER, CA 92237

DATE SAMPLE PREPARED:02/16/94 02/18/94

ANALYTICAL BATCH LAB ID NO.: SCL 13486 - 13486A

ANALYTICAL PROCEDURES USED: EPA METHOD 8081 GC/ECD FOR PCB ANALYSIS
EPA METHOD 3540 SOXHLET EXTRACTION

DATE SAMPLE ANALYZED:02/18/94

QC REPORT FOR
MATRIX SPIKE(MS)/MATRIX SPIKE DUPLICATE(MSD) PERCENT RECOVERY

MATRIX SPIKE PERFORMED ON SCL 13486A TYPE OF MATRIX SOIL TYPE OF SPIKED PCB 1260

COMPOUND	AMOUNT OF ANALYTE IN SAMPLE	AMOUNT ANALYTE ADDED	MATRIX SPIKE		MATRIX SPIKE DUPLICATE		AVE	CONTROL LIMITS FOR % REC	R % D BETWEEN MS/MSD	[illegible]
			AMOUNT RECOVERED	% REC	AMOUNT RECOVERED	% REC	% REC			
	mg/kg	mg/kg	mg/kg	%	mg/kg	%	%	%	%	
PCB 1260	<0.5	100	115	115	119	119	117	72.0-122	3.4	

NOTE: NDY = NOT DETERMINED YET

SAMPLE PREPARATION: ANALYST: SUPERVISING CHEMIST:

Monina Ligao 3/2/94 Monina Ligao 3/2/94 Russ Chin

MONINA LIGAO DATE MONINA LIGAO DATE RUSS CHIN

DEPARTMENT OF TOXIC SUBSTANCES CONTROL
HAZARDOUS MATERIALS LABORATORY - SOUTHERN CALIFORNIA
1449 W. TEMPLE STREET, LOS ANGELES, CA 90026
TELEPHONE (213) 620-3376

CASE NARRATIVE

1. THIS ANALYTICAL REPORT PACKAGE WAS PREPARED FOR SCL SAMPLES 13486 - 13486A

2. SAMPLES WERE COLLECTED ON 02/10/94 - 02/11/94 AT EAGLE MOUNTAIN MINE

3. COLLECTOR'S NAME ON THE SAMPLE ANALYSIS REQUEST FORM IS RICH HUBBELL

4. SAMPLES WERE :

   RECEIVED ON 02/15/94

   EXTRACTED ON 02/16/94 - 02/18/94 BY EPA METHOD 3540 (SOXHLET EXTRACTION)

   ANALYZED ON 02/18/94 BY EPA METHOD 8081 (PCB ANALYSIS)

   DATA PACKAGE WAS COMPLETED ON 02/22/94

5. NO MAJOR PROBLEMS WERE ENCOUNTERED DURING THE COURSE OF THESE ANALYSES.

6. QC PARAMETERS/INDICATORS WERE WITHIN ESTABLISHED CONTROL LIMITS.

7. INSTRUMENT INITIAL CALIBRATION & CONTINUING CALIBRATION CRITERIA WERE MET.

8. SAMPLE HOLDING TIMES WERE MET.

DEPARTMENT OF TOXIC SUBSTANCES CONTROL
HAZARDOUS MATERIALS LABORATORY - SOUTHERN CALIFORNIA
1449 WEST TEMPLE STREET, LOS ANGELES, CA 90026
TELEPHONE (213) 620-3376

INDEX

EPA 8081 FOR SCL 13486-13486A

		PAGE
1.	CASE NARRATIVE	1
2.	INDEX	2
3.	HAZARDOUS MATERIALS SAMPLE ANALYSIS REQUEST FORMS	3 - 4
4.	LABORATORY ANALYTICAL REPORT(S)	5
5.	QC REPORT FOR a. Method Blank b. Method Standard recovery c. Laboratory Control Sample d. Sample Duplicate Analysis	6
6.	QC REPORT FOR Matrix Spike / Matrix Spike Duplicate Recovery	7

TOTAL PAGES = 7

ATTACHMENT 5

DEPARTMENT OF TOXIC SUBSTANCES CONTROL
HAZARDOUS MATERIALS LABORATORY - SOUTHERN CALIFORNIA
1449 WEST TEMPLE STREET, LOS ANGELES, CA 90026
TELEPHONE (213) 620-3376

CASE NARRATIVE

1. THIS ANALYTICAL REPORT PACKAGE WAS PREPARED FOR SCL SAMPLES 13479,13480,13481,13482 13483,13485,13486,13486A

2. SAMPLES WERE COLLECTED ON 02/10,11/94 AT EAGLE MOUNTAIN MINE EAGLE MOUNTAIN MINE DESERT CENTER 92237

3. COLLECTOR'S NAME ON THE SAMPLE ANALYSIS REQUEST FORM IS RICHARD HUBBELL

4. SAMPLES WERE :

RECEIVED ON 02/15/94

EXTRACTED ON 02/17-23/94 BY EPA METHOD 3540 (SOXHLET EXTRACTION)

CLEANEDUP ON 02/23/94 BY EPA METHOD 3640 (GEL PERMEATION COLUMN)

ANALYZED ON 02/24,25/94 BY EPA METHOD 8270 (SEMIVOLATILE ORGANICS)

DATA PACKAGE WAS COMPLETED ON 02/25/94

5. NO MAJOR PROBLEMS WERE ENCOUNTERED DURING THE COURSE OF THESE ANALYSES.

6. ALL QC PARAMETERS/INDICATORS WERE WITHIN CONTROL LIMITS.

7. INSTRUMENT INITIAL CALIBRATION & CONTINUING CALIBRATION CRITERIA WERE MET.

8. HOLDING TIMES WERE MET.

DEPARTMENT OF TOXIC SUBSTANCES CONTROL
HAZARDOUS MATERIALS LABORATORY - SOUTHERN CALIFORNIA
1449 WEST TEMPLE STREET, LOS ANGELES, CA 90026
TELEPHONE (213) 620-3376

INDEX

(EPA 8270 FOR SCL 13479,13480,13481,13482,13483,13485,13486,13486A)

	PAGE
1. CASE NARRATIVE	1
2. INDEX	2
3. HAZARDOUS MATERIALS SAMPLE ANALYSIS REQUEST FORMS	3 - 4
4. LABORATORY ANALYTICAL REPORT(S)	5 - 7
5. QC REPORT FOR a. Method Standard Recovery b. Laboratory Control Sample c. Duplicate Sample Analysis	8
QC REPORT FOR Matrix Spike / Matrix Spike Duplicate Recovery	9
QC REPORT FOR Surrogate Recovery	10

TOTAL PAGES = 10

State of California Health and Welfare Agency

Department of [illegible]
Hazardous Mat[illegible]

HAZARDOUS MATERIALS SAMPLE ANALYSIS REQUEST

1. Authorization Number: S C J 2 0 2 1

HML No.
To

3. Requestor: Rich Hubbell, [illegible]
Address (To Receive Results): 245 [illegible] #425, [illegible]

4. Phone (8) 635-5428

5. Priority [2]
a. Authorized by

6. Date Sampled 2/10/94

7. Time Sampled • Hours

8. Codes (fill in all applicable codes)

a. STC	3 0 8 [illegible]
b. Region	0 4
c. TPC	
d. INDEX	6 4 1 0
e. PCA	3 6 3 2 0
f. SITE	
g. County	0 3 3

9. Activity: [x] SEB [ ] SMP [ ] FPB [ ] ATD [ ] PASD [ ] Other

10. SAMPLING LOCATION

a. EPA ID No.: C A D 0 0 3 9 3 4 8 9 0

b. Site: Eagle Mountain Mine

c. Address: Eagle Mtn Mine, Desert Center 92239
Number Street City Zip

11. SAMPLES

a. ID	b. Collector's No.	c. Lab No.	Sample d. Type	Container e. Type	Container f. Size	g. Field Information
A	SH-1-A	13479	Soil	glass	16oz	Shovel Area
B	EC-1A	13480	"	"	"	Eagle Creek [illegible]
C	SH-2A	3481	"	"	"	Shovel Area
D	SC1A	13482	"	"	"	Scrap Stage [illegible]
E	SC2A	13483	"	"	"	Main Shop [illegible]
F	[illegible]1A	13484	"	"	"	[illegible]
G	[illegible]1A	13485	"	"	"	East Pit [illegible]
H	CBP1A	13486	"	"	"	Open Barn [illegible]

12. ANALYSIS REQUESTED

a. [ ] pH
b. [x] Metal Scan: A, B, C, D, E, F
c. [ ] Metals (Spec)
d. [ ] W.E.T.
f. [x] PCB
g. [ ] VOA-H/S
h. [x] VOA 8240: G, H
i. [ ] VOA-8260
j. [x] SVO-8270: A, B, C, D, E, G, H
k. [ ] Ext. Org (Screening)
l. [ ] Flash Point
m. [ ]
n. [ ]
o. [ ]

13. SUPPLEMENTAL REQUESTS [ ] [ ] [ ] [ ]
Initials
Date

14. CHAIN OF CUSTODY

a. [signature] Signature — Richard Hubbell AHMS Name/Title — 2/10/94 21 Inclusive Dates
b. Janice Wakakuwa Signature — Janice Wakakuwa PHS III Name/Title — 2/15/94 Inclusive Dates
c. Signature — Name/Title — / / / Inclusive Dates
d. Signature — Name/Title — / / / Inclusive Dates

15. SPECIAL REMARKS:

16. ASSIGNED TO: Date

17. LAB REMARKS:

[illegible] (Rev 10/90)

Original Lab • Duplicate File • Triplicate Inspector

State of California Health and Welfare Agency

Department of He
Hazardous Mater

HAZARDOUS MATERIALS SAMPLE ANALYSIS REQUEST

1. Authorization Number: 5 C T 2 C 2 1

HML No.
To

3. Requestor: Rich Indrelli
4. Phone (8)0 [illegible]
Address (To Receive Results): 245 W. Broadway #[illegible] Long Beach CA 90[illegible]

5. Priority [2]
a. Authorized by _____

6. Date Sampled 2/14/94
7. Time Sampled • Hours

8. Codes (fill in all applicable codes)

a. STC	3 6 5 [illegible]
b. Region	0 4
c. TPC	
d. INDEX	0 4 1 [illegible]
e. PCA	3 6 3 1
f. SITE	
g. County	1 3 3

9. Activity: ☒ SEB ☐ SMB ☐ FPB ☐ ATD ☐ PASD ☐ Other

10. SAMPLING LOCATION

a. EPA ID No. C A C 0 0 3 9 3 4 5 4 0

b. Site Eagle Mountain Mine

c. Address (Number, Street, City, Zip) Eagle Min Mine, Desert Center 92239

11. SAMPLES

a. ID	b. Collector's No.	c. Lab No.	d. Sample Type	e. Container Type	f. Container Size	g. Field Information
A	DPB-2A	13436A	Soil	glass	16 oz.	Open Pit
B						
C						
D						
E						
F						
G						
H						

12. ANALYSIS REQUESTED

a. [ ] pH		f. ☒ PCB	A	k. ☐ Ext. Org (Screening)	
b. [ ] Metal Scan		g. ☐ VOA H/S		l. ☐ Flash Point	
c. [ ] Metals (Spec)		h. ☒ VOA-8240	A	m. ☐	
d. [ ] W.E.T.		i. ☐ VOA-8260		n. ☐	
		j. ☒ SVO-8270	A	o. ☐	

13. SUPPLEMENTAL REQUESTS ☐ _____ ☐ _____ ☐ _____ ☐ _____

Initials _____
Date _____

14. CHAIN OF CUSTODY

	Signature	Name/Title	Inclusive Dates
a	[illegible]	Richard Indrelli / [illegible]	2/11 [illegible]
b	Janice Wakakuwa	Janice Wakakuwa / PHC III	2/15/94
c			/ / - / /
d			/ / - / /

15. SPECIAL REMARKS: _____

16. ASSIGNED TO: _____ Date _____

17. LAB REMARKS: _____

(Rev 1/90)

Original Lab • Duplicate File • Duplicate Inspector

ATTACHMENT 11

California Environmental Protection Agency
Department of Toxic Substances Control
Hazardous Materials Laboratory (Inorganic Section)
151 Berkeley Way, Berkeley, CA 94704

Phone: (510) 540-3003 or (ATSS) 571-3003

HML #: 931188 to 931195

Collector's Name: RICH HUBBEL
Site of Sampling: EAGLE MOUNTAIN MINE
EAGLE MOUNTAIN MINE
DESERT CITY, 92239

Auth. No.: HMJ2021
Activity : SEB
Date Collected: 2/10
Date Received: 3/9/94

Analytical Procedure: EPA-SW 846

Samples are digested with 1:1 HNO3 (and 30% H2O2, and 1:1 HCl, if applicable) over a hot plate. Digests are cooled, filtered and made to final volume with deionized H2O. Metal analysis of the digests is by ICPAES (EPA #6010). Units are mg/kg.

Method: 3050 for solids; 3010 for liquids; 3005 for clean water.

HML Number:	931193	931194	931195
Collector's Sample No.:	ETP-1-A	EPS-1-A	OBP-1-A
Sample Type:	SOIL	SOIL	SOIL
Arsenic	31.0	<5.00	16.6
Barium	28.8	55.2	66.2
Beryllium	0.49	0.48	0.62
Cadmium	7.26	0.49	4.96
Cobalt	161	8.06	126
Chromium	8.64	7.16	17.1
Copper	605	26.9	429
Molybdenum	<3.75	<3.75	<3.75
Nickel	21.3	8.92	27.6
Lead	96.1	6.70	46.6
Selenium	<7.50	<7.50	<7.50
Thallium	<15.0	<15.0	<15.0
Vanadium	17.5	34.7	29.2
Zinc	386	30.9	166

Notes: < - below detection limit of method.

ICP Analyst, Marlyn de Guzman — 3/18/94 Date

Chemist's Signature, Zenaida Odion, Chemist — 3/31/94 Date

Milad S. Iskander, Supervisor — 4/4/94 Date

ATTACHMENT 10

"business" includes a business organized for profit and a nonprofit business.

(e) "Business plan" means a separate plan for each facility, site, or branch of a business which meets the requirements of Section 25504.

(f) "Chemical name" means the scientific designation of a substance in accordance with the nomenclature system developed by the International Union of Pure and Applied Chemistry or the system developed by the Chemical Abstracts Service.

(g) "Common name" means any designation or identification, such as a code name, code number, trade name, or brand name, used to identify a substance other than by its chemical name.

(h) "Department" means the State Department of Health Services and "director" means the State Director of Health Services.

(i) "Handle" means to use, generate, process, produce, package, treat, store, emit, discharge, or dispose of a hazardous material in any fashion.

(j) "Handler" means any business which handles a hazardous material.

(k) "Hazardous material" means any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. "Hazardous materials" include, but are not limited to, hazardous substances, hazardous waste, and any material which a handler or the administering agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.

(l) "Hazardous substance" means any substance or chemical product for which one of the following applies:

(1) The manufacturer or producer is required to prepare a MSDS for the substance or product pursuant to the Hazardous Substances Information and Training Act (Chapter 2.5 (commencing with Section 6360) of Part 1 of Division 5 of the Labor Code) or pursuant to any applicable federal law or regulation.

(2) The substance is listed as a radioactive material in Appendix B of Chapter 1 of Title 10 of the Code of Federal Regulations, maintained and updated by the Nuclear Regulatory Commission.

(3) The substances listed pursuant to Title 49 of the Code of Federal Regulations.

(4) The materials listed in subdivision (b) of Section 6382 of the Labor Code.

(m) "Hazardous waste" means hazardous waste, as defined by Sections 25115, 25117, and 25316.

(n) "Office" means the Office of Emergency Services.

(o) "Release" means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, unless permitted or authorized by a regulatory agency.

(p) "SIC Code" means the identification assigned by the Standard Industrial Classification to specific types of businesses.

(q) "Threatened release" means a release creating a substantial probability of harm, where the probability and potential extent of harm make it reasonably necessary to take immediate action to prevent, reduce, or mitigate damages to persons, property, or the environment.

(r) "Emergency rescue personnel" means any public employee, including, but not limited to, a fireman, firefighter, or emergency rescue personnel defined in Section 245.1 of the Penal Code, or personnel of a local EMS agency, as designated pursuant to Section 1797.200, or a poison control center, as defined in Section 1797.97, who responds to any condition caused in whole or in part, by a hazardous material that jeopardizes, or could jeopardize, public health or safety or the environment.

(s) "City" includes any city and county.

(t) "Trade secret" means trade secrets as defined in subdivision (d) of Section 6254.7 of the Government Code and Section 1060 of the Evidence Code.

(Amended by Stats. 1990, Ch. 1662.)

25501.1. Notwithstanding Section 25501, for purposes of this chapter, a hazardous substance specified in paragraph (3) of subdivision (k) of Section 25501 means those hazardous materials or substances listed in Parts 172 and 173 of Title 49 of the Code of Federal Regulations.

(Added by Stats. 1986, Ch. 463.)

25501.2. For purposes of the inventory requirements of this chapter, "store," as used in subdivision (h) of Section 25501, does not include the storage of hazardous materials which are in transit or which are temporarily maintained in a fixed facility for a period of less than 30 days during the course of transportation.

(Added by Stats. 1986, Ch. 463.)

25501.3. "Handle" also means the use or potential for use of a quantity of hazardous material by the connection of any marine vessel, tank vehicle, tank car, or container to a system or process for any purpose other than the immediate transfer to or from an approved atmospheric tank or approved portable tank.

(Added by Stats. 1991, Ch. 1183)

25501.4. (a) Notwithstanding subdivision (c) of Section 25501, "business" also includes the federal government, to the extent authorized by federal law, and any agency, department, office, board, commission, or bureau of state government, including, but not limited to, the campuses of the California Community Colleges, the

ATTACHMENT 12

disposal, or handling of hazardous waste or hazardous materials in the three years preceding the filing of the disclosure statement.

(8) A listing and explanation of any federal or state conviction, judgment, or settlement, in the three years immediately preceding the filing of the statement, with any remedial actions or resolutions if applicable, relating to the generation, transportation, treatment, storage, recycling, disposal, or handling of hazardous waste or hazardous materials by the applicant, or by the applicant under any previous name or names, or if the applicant is a business concern, by any officer, director, or partner of the business concern.

(9) A listing of all owners, officers, directors, trustees, and partners of the applicant who have owned, or been an officer, director, trustee, or partner of, any company which generated, transported, treated, stored, recycled, disposed of, or handled hazardous wastes or hazardous materials and which was the subject of any of the actions described in paragraphs (6) and (8) for the three years preceding the filing of the statement.

(b) In lieu of the statement specified in subdivision (a), a corporation, the stock of which is listed on a national securities exchange and registered under the Securities Exchange Act of 1934 (15 U.S.C. Sec. 78a et seq.), or a subsidiary of such a corporation, may submit to the department copies of all periodic reports, including, but not limited to, those reports required by Section 78m of Title 15 of the United States Code and Part 229 (commencing with Section 229.10) of Chapter II of Title 17 of the Code of Federal Regulations which the corporation or subsidiary has filed with the Securities and Exchange Commission in the three years immediately preceding the submittal, if the corporation or subsidiary or it has held a hazardous waste facility permit or operated a hazardous waste facility under interim status pursuant to Section 25200 or 25200.5 since January 1, 1981.

(Added by Stats. 1989, Ch. 1257.)

25113. (a) "Disposal" means either of the following:

(1) The discharge, deposit, injection, dumping, spilling, leaking, or placing of any waste so that the waste or any constituent of the waste is or may be emitted into the air or discharged into or on any land or waters, including groundwaters, or may otherwise enter the environment.

(2) The abandonment of any waste.

(b) The amendment of the section made at the 1989-90 Regular Session of the Legislature does not constitute a change in, but is declaratory of, the existing law.

(Amended by Stats. 1989, Ch. 1436.)

25114. "Disposal site" means the location where any final deposition of hazardous waste occurs.

(Amended by Stats. 1977, Ch. 1039.)

25115. "Extremely hazardous waste" means any hazardous waste or mixture of hazardous wastes which if human exposure should occur, may likely result in death, disabling personal injury or serious illness caused by the hazardous waste or mixture of hazardous waste because of its quantity, concentration, or chemical characteristics.

(Amended by Stats. 1977, Ch. 1039.)

25115.1. "Federal act" means the Resource Conservation and Recovery Act of 1976, as amended (42 U.S.C. Sec. 6901 et seq.).

(Added by Stats. 1988, Ch. 1061.)

25116. "Handling" means the transporting or transferring from one place to another, or pumping, processing, storing, or packaging of hazardous waste, but does not include the handling of any substance before it becomes a waste.

(Amended by Stats. 1980, Ch. 878.)

25116.5. (Repealed by Stats. 1986, Ch. 1187.)

25117. (a) "Hazardous waste" means either of the following:

(1) A waste, or combination of wastes, which because of its quantity, concentration, or physical, chemical, or infectious characteristics may either:

(A) Cause, or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness.

(B) Pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported, or disposed of, or otherwise managed.

(2) A waste which meets any of the criteria for the identification of a hazardous waste adopted by the department pursuant to Section 25141.

(b) "Hazardous waste" includes, but is not limited to, RCRA hazardous waste.

(c) Unless expressly provided otherwise, the term "hazardous waste" shall be understood to also include extremely hazardous waste and acutely hazardous waste.

(Amended by Stats. 1989, Ch. 1436.)

25117.1. "Hazardous waste facility" means all contiguous land and structures, other appurtenances, and improvements on the land used for the treatment, transfer, storage, resource recovery, disposal, or recycling of hazardous waste. A hazardous waste facility may consist of one or more treatment, transfer, storage, resource recovery, disposal, or recycling hazardous waste management units, or combinations of these units.

(Amended by Stats. 1990, Ch. 1686.)

25117.2. "Hazardous waste management" or "management" means the transportation, transfer

ATTACHMENT 13

in achieving operational status, including a timetable for becoming operational.

(3) An assessment of the need for additional hazardous waste facilities to manage the volumes of hazardous waste currently produced or which are expected to be produced during the next 20 years.

(4) An identification of the area or regions of the state where new or expanded capacity to manage hazardous wastes are needed and the types of facilities that should be sited and constructed.

(5) A description of the policies, programs, incentives, requirements, prohibitions, or other measures which, if implemented, would reduce or eliminate the need for new or expanded facilities.

(6) A statement of goals, objectives, and policies currently in effect, or in the process of development, for the siting of hazardous waste facilities and the management of hazardous wastes during the next five years.

(7) A schedule of recommended actions, including specific dates, for carrying out state, regional, and local actions to implement the state hazardous waste management plan.

(Amended by Stats. 1990, Ch. 1093.)

Article 4. Listings

(Article 4 added by Stats. 1972, Ch. 1236)

25140. The department shall prepare, adopt and may revise when appropriate, a listing of the wastes which are determined to be hazardous, and a listing of the wastes which are determined to be extremely hazardous. In identifying such wastes the department shall consider, but not be limited to, the immediate or persistent toxic effects to man and wildlife and the resistance to natural degradation or detoxification of the wastes.

(Added by Stats. 1972, Ch. 1236.)

25141. The department shall develop and adopt by regulation criteria and guidelines for the identification of hazardous wastes and extremely hazardous wastes.

(Added by Stats. 1977, Ch. 1039.)

25141.1. (a) The California Environmental Protection Agency shall enter into a contract for a study to determine if the criteria specified in Section 66261.22 of Title 22 of the California Code of Regulations, including existing testing protocols, should apply to cementitious wastes, including, but not limited to, portland cement and cement kiln dust. Until the study is completed, or until January 1, 1994, whichever occurs first, the department shall suspend the application of Section 66261.22 of Title 22 of the Code of Regulations with regard to determining corrosivity for these cementitious wastes.

(b) The Secretary for Environmental Protection shall appoint a technical advisory committee to assist in the selection of the contractor who is to conduct the study required by this section and to provide technical assistance during the study. The committee shall include a representative of all of the following, and the member appointed shall be technically qualified in the field of environmental science, chemistry, or biochemistry.

(1) The Secretary for Environmental Protection.

(2) The department.

(3) The State Water Resources Control Board.

(4) The California Integrated Waste Management Board.

(5) The state's cement industry.

(6) An environmental organization.

(c) It is the intent of the Legislature that the study required by this section shall be funded solely from funds provided from private industry, but the cost of the study shall not exceed one hundred thousand dollars ($100,000).

(d) The California Environmental Protection Agency shall only implement this section if private funds are made available in an amount sufficient to cover the total costs, including administrative expenses, of implementation.

(e) No state funds shall be used to implement this section.

(f) This section shall remain in effect only until January 1, 1994, and as of that date is repealed, unless a later enacted statute, which is enacted before January 1, 1994, deletes or extends that date.

(Added by Stats. 1992, Ch. 1125)

25141.5. The department shall, when classifying a waste as hazardous pursuant to the criteria in paragraph (8) of subdivision (a) of Section 66261.24 of Title 22 of the California Code of Regulations, as that section read on January 1, 1993, incorporate the department's decision into a regulation, if the deaprtment determines that the waste's classification as a hazardous waste is likely to have broad application beyond the producer who initiated the request.

(Added by Stats. 1992, Ch. 1058)

25142. Any waste which conforms to a criterion adopted pursuant to Section 25141 shall be managed in accordance with permits, orders, and regulations issued or adopted by the department pursuant to this chapter and building standards published in the State Building Standards Code relating to hazardous waste facilities, or recycled consistent with the list of hazardous wastes which the department, pursuant to Section 25175, finds are economically and technologically feasible to recycle until the waste is cited in a list adopted by the department pursuant to Section 25140.

(Amended by Stats. 1988, Ch. 1631.)

25143. (a) The department may grant a variance from one or more of the requirements of this chapter, or the regulations adopted pursuant to this chapter, for the

ATTACHMENT 14

(7) it contains any of the following substances at a single or combined concentration equal to or exceeding 0.001 percent by weight:

(A) 2–Acetylaminofluorene (2–AAF);

(B) Acrylonitrile;

(C) 4–Aminodiphenyl;

(D) Benzidine and its salts;

(E) bis (Chloromethyl) ether (BCME);

(F) Methyl chloromethyl ether;

(G) 1,2–Dibromo–3–chloropropane (DBCP);

(H) 3,3′–Dichlorobenzidine and its salts (DCB);

(I) 4–Dimethylaminoazobenzene (DAB);

(J) Ethyleneimine (EL);

(K) alpha–Naphthylamine (1–NA);

(L) beta–Naphthylamine (2–NA);

(M) 4–Nitrobiphenyl (4–NBP);

(N) N–Nitrosodimethylamine (DMN);

(0) beta–Propiolactone (BPL);

(P) Vinyl chloride (VCM);

(8) it has been shown through experience or testing to pose a hazard to human health or environment because of its carcinogenicity, acute toxicity, chronic toxicity, bioaccumulative properties or persistence in the environment.

(b) A waste containing one or more materials which exhibit the characteristic of toxicity because the materials have the property specified in subsection (a)(5) of this section may be classified as nonhazardous pursuant to section 66260.200 if the waste does not exhibit any other characteristic of this article and is not listed in article 4 of this chapter and its head space vapor contains no such toxic materials in concentrations exceeding their respective acute inhalation LC_{50} or their LC_{LO}. The head space vapor of a waste shall be prepared, and two milliliters of it shall be sampled using a five milliliter gas–tight syringe, according to Method 5020 in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW–846, 2nd edition, U.S. Environmental Protection Agency, 1982 (incorporated by reference, see section 66260.11). The quantity in milligrams of each material, which exhibits the characteristic of toxicity because it has the property specified in subsection (a)(5) of this section, in the sampling syringe shall be determined by comparison to liquid standard solutions according to the appropriate gas chromatographic procedures in Method 8010, 8015, 8020, 8030 or 8240 in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW–846, 3rd edition, U.S. Environmental Protection Agency, 1986 (incorporated by reference, see section 66260.11). The concentration of each material in the head space vapor shall be calculated using the following equation:

$$C_A = \frac{Q_A}{MW} \times \frac{29.8\text{ml}}{\text{mmole}} \times \frac{1}{2 \times 10^{-6} M^3}$$

where C (in parts per million) is the concentration of material A in head space vapor, Q (in milligrams) is the quantity of material A in sampling syringe and MW (in milligrams per millimole) is the molecular weight of material A. Where an acute inhalation LC_{50} is not available, an LC_{50} measured for another time (t) may be converted to an eight–hour value with the following equation:

Eight–hour LC_{50} = (t/8) x (t–hour LC_{50}).

(c) A waste containing one or more materials which exhibit the characteristic of toxicity because the materials have either of the properties specified in subsection (a)(3) or (a)(4) of this section may be classified as nonhazardous pursuant to section 66260.200 if the waste does not exhibit any other characteristic of this article and is not listed in article 4 of this chapter and the calculated oral LD_{50} of the waste mixture is greater than 5,000 milligrams per kilogram and the calculated dermal LD_{50} is greater than 4,300 milligrams per kilogram by the following equation:

$$\text{Calculated oral or dermal } LD_{50} = \frac{100}{\sum_{x=1}^{n} \frac{\%}{{}^{T}A_x}}$$

where $\%A_x$ is the weight percent of each component in the waste mixture and ${}^{T}A_X$ is the acute oral or dermal LD_{50} or the acute oral LD_{LO} of each component.

NOTE: Authority cited: Sections 208, 25141 and 25159, Health and Safety Code. Reference: Sections 25117, 25120.2, 25141, 25159 and 25159.5, Health and Safety Code and 40 CFR Section 261.24.

HISTORY

1. New section filed 5–24–91; effective 7–1–91 (Register 91, No. 22).

Article 4. Lists of RCRA Hazardous Wastes

§ 66261.30. General.

(a) A waste is a RCRA hazardous waste if it is listed in this article, unless it has been excluded from this list pursuant to 40 CFR sections 260.20 and 260.22 or is categorized as a non–RCRA hazardous waste pursuant to section 66261.101. Wastes shall only be listed in this article if they are listed in 40 CFR Part 261 Subpart D.

(b) The Department will indicate the USEPA Administrator's basis for listing the classes or types of wastes listed in this article by employing one or more of the following Hazard Codes:

Ignitable Waste	(I)
Corrosive Waste	(C)
Reactive Waste	(R)
Acute Hazardous Waste	(H)
Toxic Waste	(T)

Appendix VII of this chapter identifies the constituent which caused the USEPA Administrator to list the waste as a Toxic Waste (T) as included in sections 66261.31 and 66261.32.

(c) Each RCRA hazardous waste listed in this article is assigned an EPA Hazardous Waste Number which precedes the name of the waste. This number shall be used in complying with the notification requirements of Health and Safety Code section 25153.6 and certain recordkeeping and reporting requirements under chapters 12 through 15, 18, and 20 of this division.

NOTE: Authority cited: Sections 208, 25141 and 25159, Health and Safety Code. Reference: Sections 25117, 25120.2, 25141, 25159 and 25159.5, Health and Safety Code and 40 CFR Section 261.30.

HISTORY

1. New section filed 5–24–91; effective 7–1–91 (Register 91, No. 22).

EPA Hazardous Waste Number	Contaminant	Chemical Abstracts Service Number	Regulatory Level Mg/l
D004	Arsenic	7440–38–2	5.0
D005	Barium	7440–39–3	100.0
D018	Benzene	71–43–2	0.5
D006	Cadmium	7440–43–9	1.0
D019	Carbon tetrachloride	56–23–5	0.5
D020	Chlordane	57–74–9	0.03
D021	Chlorobenzene	108–90–7	100.0
D022	Chloroform	67–66–3	6.0
D007	Chromium	7440–47–3	5.0
D023	o–Cresol	95–48–7	200.0[1]
D024	m–Cresol	108–39–4	200.0[1]
D025	p–Cresol	106–44–5	200.0[1]
D026	Cresol		200.0[1]
D016	2,4–D	94–75–7	10.0
D027	1,4–Dichlorobenzene	106–46–7	7.5
D028	1,2–Dichloroethane	107–06–2	0.5
D029	1,1–Dichloroethylene	75–35–4	0.7
D030	2,4–Dinitrotoluene	121–14–2	0.13
D012	Endrin	72–20–8	0.02
D031	Heptachlor (and its epoxide)	76–44–8	0.008
D032	Hexachlorobenzene	118–74–1	0.13
D033	Hexachlorobutadiene	87–68–3	0.5
D034	Hexachloroethane	67–72–1	3.0
D008	Lead	7439–92–1	5.0
D013	Lindane	58–89–9	0.4
D009	Mercury	7439–97–6	0.2
D014	Methoxychlor	72–43–5	10.0
D035	Methyl ethyl ketone	78–93–3	200.0
D036	Nitrobenzene	98–95–3	2.0
D037	Pentachlorophenol	87–86–5	100.0
D038	Pyridine	110–86–1	5.0[2]
D010	Selenium	7782–49–2	1.0
D011	Silver	7440–22–4	5.0
D039	Tetrachloroethylene	127–18–4	0.7
D015	Toxaphene	8001–35–2	0.5
D040	Trichloroethylene	79–01–6	0.5
D041	2,4,5–Trichlorophenol	95–95–4	400.0
D042	2,4,6–Trichlorophenol	88–06–2	2.0
D017	2,4,5–TP (Silvex)	93–72–1	1.0
D043	Vinyl chloride	75–01–4	0.2

[1] If o–, m– and p–Cresol concentrations cannot be differentiated, the total cresol (D026) concentration is used. The regulatory level of total cresol is 200 mg/l.

[2] Quantitation limit is greater than the calculated regulatory level. The quantitation limit therefore becomes the regulatory level.

(2) it contains a substance listed in subsections (a)(2)(A) or (a)(2)(B) of this section at a concentration in milligrams per liter of waste extract, as determined using the Waste Extraction Test (WET) described in Appendix II of this chapter, which equals or exceeds its listed soluble threshold limit concentration or at a concentration in milligrams per kilogram in the waste which equals or exceeds its listed total threshold limit concentration;

(A) Table II – List of Inorganic Persistent and Bioaccumulative Toxic Substances and Their Soluble Threshold Limit Concentration:

(STLC) and Total Threshold Limit Concentration (TTLC) Values.

Substance**	STLC mg/l	TTLC Wet–Weight mg/kg
Antimony and/or antimony compounds	15	500
Arsenic and/or arsenic compounds	5.0	500
Asbestos		1.0 (as percent)
Barium and/or barium compounds (excluding barite)	100	10,000++
Beryllium and/or beryllium compounds	0.75	75
Cadmium and/or cadmium compounds	1.0	100
Chromium (VI) compounds	5	500
Chromium and/or chromium (III) compounds	5**	2,500
Cobalt and/or cobalt compounds	80	8,000
Copper and/or copper compounds	25	2,500
Fluoride salts	180	18,000
Lead and/or lead compounds	5.0	1,000
Mercury and/or mercury compounds	0.2	20
Molybdenum and/or molybdenum compounds	350	3,500
Nickel and/or nickel compounds	20	2,000
Selenium and/or selenium compounds	1.0	100
Silver and/or silver compounds	5	500
Thallium and/or thallium compounds	7.0	700
Vanadium and/or vanadium compounds	24	2,400
Zinc and/or zinc compounds	250	5,000

*STLC and TTLC values are calculated on the concentrations of the elements, not the compounds.

**If the soluble chromium, as determined by the TCLP set forth in Appendix I of chapter 18 of this division, is less than 5 mg/l, and the soluble chromium, as determined by the procedures set forth in Appendix II of chapter 11, equals or exceeds 560 mg/l and the waste is not otherwise identified as a RCRA hazardous waste pursuant to section 66261.100, then the waste is a non–RCRA hazardous waste.

+In the case of asbestos and elemental metals, the specified concentration limits apply only if the substances are in a friable, powdered or finely divided state. Asbestos includes chrysotile, amosite, crocidolite, tremolite, anthophyllite, and actinolite.

++Excluding barium sulfate.

(B) Table III – List of Organic Persistent and Bioaccumulative Toxic Substances and Their Soluble Threshold Limit Concentration (STLC) and Total Threshold Limit Concentration (TTLC) Values:

Substance	STLC mg/l	TTLC Wet Weight mg/kg
Aldrin	0.14	1.4
Chlordane	0.25	2.5
DDT, DDE, DDD	0.1	1.0
2,4–Dichlorophenoxyacetic acid	10	100
Dieldrin	0.8	8.0
Dioxin (2,3,7,8–TCDD)	0.001	0.01
Endrin	0.02	0.2
Heptachlor	0.47	4.7
Kepone	2.1	21
Lead compounds, organic	—	13
Lindane	0.4	4.0
Methoxychlor	10	100
Mirex	2.1	21
Pentachlorophenol	1.7	17
Polychlorinated biphenyls (PCBs)	5.0	50
Toxaphene	0.5	5
Trichloroethylene	204	2,040
2,4,5–Trichlorophenoxypropionic acid	1.0	10

(3) it has an acute oral LD_{50} less than 5,000 milligrams per kilogram;

(4) it has an acute dermal LD_{50} less than 4,300 milligrams per kilogram;

(5) it has an acute inhalation LC_{50} less than 10,000 parts per million as a gas or vapor;

(6) it has an acute aquatic 96–hour LC_{50} less than 500 milligrams per liter when measured in soft water (total hardness 40 to 48 milligrams per liter of calcium carbonate) with fathead minnows (*Pimephales promelas*), rainbow trout (*Salmo gairdneri*) or golden shiners (*Notemigonus crysoleucas*) according to procedures described in Part 800 of the "Standard Methods for the Examination of Water and Wastewater (16th Edition)," American Public Health Association, 1985 and "Static Acute Bioassay Procedures for Hazardous Waste Samples," California Department of Fish and Game, Water Pollution Control Laboratory, revised November 1988 (incorporated by reference, see section 66260.11), or by other test methods or test fish approved by the Department, using test samples prepared or meeting the conditions for testing as prescribed in subdivisions (c) and (d) of Appendix II of this chapter, and solubilized, suspended, dispersed or emulsified by the cited procedures or by other methods approved by the Department;

In addition to the sampling methods in chapter nine of SW–846, the Department will consider samples obtained using any of the other applicable sampling methods specified in Appendix 1 of this chapter to be representative samples.

NOTE: Authority cited: Sections 208, 25141 and 25159, Health and Safety Code. Reference: Sections 25141, 25159 and 25159.5, Health and Safety Code and 40 CFR Section 261.20.

HISTORY

1. New section filed 5–24–91; effective 7–1–91 (Register 91, No. 22).

§ 66261.21. Characteristic of Ignitability.

(a) A waste exhibits the characteristic of ignitability if representative samples of the waste have any of the following properties:

(1) it is a liquid, other than an aqueous solution containing less than 24 percent alcohol by volume, and has a flash point less than 60°C (140°F), as determined by a Pensky–Martens Closed Cup Tester, using the test method specified in ASTM Standard D–93–79 or D–93–80 (incorporated by reference, see section 66260.11), or a Setaflash Closed Cup Tester, using the test method specified in ASTM Standard D–3278–78 (incorporated by reference, see section 66260.11), or as determined by an equivalent test method approved by the Department pursuant to section 66260.21;

(2) it is not a liquid and is capable, under standard temperature and pressure, of causing fire through friction, absorption of moisture or spontaneous chemical changes and, when ignited, burns so vigorously and persistently that it creates a hazard;

(3) it is an ignitable compressed gas as defined in 49 CFR section 173.300 (as amended September 30, 1982) and as determined by the test methods described in that regulation or equivalent test methods approved by the Department pursuant to section 66260.21;

(4) it is an oxidizer as defined in 49 CFR section 173.151 (as amended May 31, 1979).

(b) A waste that exhibits the characteristic of ignitability has the EPA Hazardous Waste Number of D001.

NOTE: Authority cited: Sections 208, 25141 and 25159, Health and Safety Code. Reference: Sections 25117, 25120.2, 25141, 25159 and 25159.5, Health and Safety Code and 40 CFR Section 261.21.

HISTORY

1. New section filed 5–24–91; effective 7–1–91 (Register 91, No. 22).

§ 66261.22. Characteristic of Corrosivity.

(a) A waste exhibits the characteristic of corrosivity if representative samples of the waste have any of the following properties:

(1) it is aqueous and has a pH less than or equal to 2 or greater than or equal to 12.5, as determined by a pH meter using either the EPA test method for pH or an equivalent test method approved by the Department pursuant to section 66260.21. The EPA test method for pH is specified as Method 9040 in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW–846, 3rd edition, U.S. Environmental Protection Agency, 1986 (incorporated by reference, see section 66260.11);

(2) it is a liquid and corrodes steel (SAE 1020) at a rate greater than 6.35 mm (0.250 inch) per year at a test temperature of 55°C (130°F) as determined by the test method specified in NACE Standard TM–01–69 as standardized in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW–846, 3rd edition, U.S. Environmental Protection Agency, 1986 (incorporated by reference, see section 66260.11) or an equivalent test method approved by the Department pursuant to section 66260.21;

(3) it is not aqueous and, when mixed with an equivalent weight of water, produces a solution having a pH less than or equal to 2 or greater than or equal to 12.5, as determined by a pH meter using either Method 9040 in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW–846, 3rd edition, U.S. Environmental Protection Agency, 1986 (incorporated by reference, see section 66260.11) or an equivalent test method approved by the Department pursuant to 66260.21;

(4) it is not a liquid and, when mixed with an equivalent weight of water, produces a liquid that corrodes steel (SAE 1020) at a rate greater than 6.35 mm (0.250 inch) per year at a test temperature of 55°C (130°F) as determined by the test method specified in NACE Standard TM–01–69 as standardized in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW–846, 3rd edition, U.S. Environmental Protection Agency, 1986 (incorporated by reference, see section 66260.11) or an equivalent test method approved by the Department pursuant to 66260.21.

(b) A waste that exhibits the characteristic of corrosivity specified in subsection (a)(1) or (a)(2) of this section has the EPA Hazardous Waste Number of D002.

NOTE: Authority cited: Sections 208, 25141 and 25159, Health and Safety Code. Reference: Sections 25117, 25120.2, 25141, 25159 and 25159.5, Health and Safety Code and 40 CFR Section 261.22.

HISTORY

1. New section filed 5–24–91; effective 7–1–91 (Register 91, No. 22).

§ 66261.23. Characteristic of Reactivity.

(a) A waste exhibits the characteristic of reactivity if representative samples of the waste have any of the following properties:

(1) it is normally unstable and readily undergoes violent change without detonating;

(2) it reacts violently with water;

(3) it forms potentially explosive mixtures with water;

(4) when mixed with water, it generates toxic gases, vapors or fumes in a quantity sufficient to present a danger to human health or the environment;

(5) it is a cyanide or sulfide bearing waste which, when exposed to pH conditions between 2 and 12.5, can generate toxic gases, vapors or fumes in a quantity sufficient to present a danger to human health or the environment;

(6) it is capable of detonation or explosive reaction if it is subjected to a strong initiating source or if heated under confinement;

(7) it is readily capable of detonation or explosive decomposition or reaction at standard temperature and pressure;

(8) it is a forbidden explosive as defined in 49 CFR section 173.51 (as amended April 20, 1987), or a Class A explosive as defined in 49 CFR section 173.53 (as amended April 5, 1967) or a Class B explosive as defined in 49 CFR section 173.88 (as amended May 19, 1980).

(b) A waste that exhibits the characteristic of reactivity has the EPA Hazardous Waste Number of D003.

NOTE: Authority cited: Sections 208, 25141 and 25159, Health and Safety Code. Reference: Sections 25117, 25120.2, 25141, 25159 and 25159.5, Health and Safety Code and 40 CFR Section 261.23.

HISTORY

1. New section filed 5–24–91; effective 7–1–91 (Register 91, No. 22).

§ 66261.24. Characteristic of Toxicity.

(a) A waste exhibits the characteristic of toxicity if representative samples of the waste have any of the following properties:

(1) when using the Toxicity Characteristic Leaching Procedure (TCLP) in Appendix I of chapter 18 of this division or equivalent methods approved by the Department under the procedures set forth in section 66260.21, the extracts from representative samples of the waste contain any of the contaminants listed in Table I of this section at a concentration equal to or greater than the respective value given in that table unless the waste is excluded from classification as a solid waste or hazardous waste or is exempted from regulation pursuant to 40 CFR section 261.4. Where the waste contains less than 0.5 percent filterable solids, the waste itself, after filtering, is considered to be the extract for the purposes of this section;

(A) a waste that exhibits the characteristic of toxicity pursuant to subsection (a)(1) of this section has the EPA Hazardous Waste Number specified in Table I of this section which corresponds to the toxic contaminant causing it to be hazardous;

(B) Table I – Maximum Concentration of Contaminants for the Toxicity Characteristic:

ATTACHMENT 15

not low hazard (based on currently available data) at ore and mineral processing facilities. Therefore, the impacts of today's rule fall within any metal or non-metal commodity sectors generating such waste streams from mineral processing operations, but only to the extent that these wastes exhibit the characteristic tests for hazardous wastes under subtitle C of RCRA.

EPA's impact assessment indicates that today's rule is not a major rule (at least according to criterion 1, above), in that preliminary screening level estimates place the total annual costs of compliance at about $53 million per year. Because this is a screening level analysis, however, the level and distribution of impacts is uncertain. It does appear that a few individual mineral commodity sectors or processing technologies could incur annual costs in the range of one to seven percent of their annual value of shipments (sales). These sectors or technologies, though few in number and small in total value of shipments relative to the 101 commodity sectors reviewed in the study, could be said to incur moderate to substantial impacts. Overall, however, with respect to the mineral industry as a whole or the portion of the industry that performs "mineral processing" in particular, the Agency believes, on the basis of its screening analysis, that today's rule does not constitute a major rule within the context of E.O. 12291.

A. General Approach to Compliance Cost Estimation

The purpose of this analysis was to assess the general level of costs and resultant economic impacts arising from the imposition of current subtitle C requirements on smaller volume mineral processing wastes and high volume wastes that are not low hazard that were previously exempt under the Bevill Amendment. As noted above, a complete and detailed examination of the costs and potential impacts of today's rule was not possible given the Court-ordered schedule prompting this rulemaking. The Agency has, however, undertaken a comprehensive screening-level review of all sectors that could be affected directly by today's rule.

EPA's economic screening methodology consisted of a number of straightforward steps designed to (1) identify and describe all mineral processing sectors, (2) characterize and determine the approximate quantities of relevant waste streams, and (3) estimate the subtitle C compliance costs for all sectors generating potentially hazardous wastes. This section briefly describes the approaches and information sources used to develop these preliminary cost estimates. The following two sections describe the cost estimates and discuss impacts on affected sectors. Additional information concerning the techniques, assumptions, and data sources used in this analysis may be found in a technical background document in the docket for today's rule.[9]

1. Processing Sector Identification

The starting point for the analysis was to identify mineral industry commodity sectors that conduct mineral processing operations within the definition of today's rule. Obviously, facilities in sectors that do not employ such operations will not experience any economic impacts. Working with the U.S. Bureau of Mines, the Agency identified a total of 101 differentiable mineral commodity sectors for initial review. Those specific sectors that employ mineral processing operations were identified by intensive contact with commodity and technical specialists at the U.S. Bureau of Mines, and by consulting outside mineral industry experts particularly knowledgeable of specific industry production techniques and waste management practices. Of the 101 initial sectors, 43 were identified as domestic mineral commodity processing sectors subject to further analysis and review of waste stream characteristics. Of the 58 remaining sectors, 51 commodity sectors were screened out as not conducting processing (i.e., their finished product resulted directly from beneficiation activities). The commodities produced domestically using extraction and beneficiation operations exclusively are listed in appendix A. An additional 7 mineral commodities are not currently processed in the United States. These include arsenic trioxide, cobalt, gallium, graphite, indium, nickel, and thallium.

It is highly noteworthy that the vast majority of mineral commodities listed in appendix A are non-metallic and that only nine of the 43 domestic sectors conducting mineral processing operations produce non-metallic commodities. Thus, the first conclusion that EPA may draw from this screening analysis is that the results from previous cost and impact studies focusing on metallic ore processing sectors are not likely to dramatically underestimate total regulatory compliance costs associated with this rule, as some commenters have persistently claimed.

[9] USEPA, "Technical Background Document: Development of the Cost, Economic, and Small Business Impacts Arising from the Reinterpretation of the Bevill Exclusion for Mineral Processing Wastes", August 18, 1989.

2. Waste Characterization

The next step was to identify, quantify, and characterize the specific waste streams generated by the 43 identified processing sectors in order to ascertain the extent to which these facilities might be brought into the subtitle C hazardous waste management system. For a few of these sectors, the Agency had past field surveys or sampling data to draw upon, supplemented to some degree by data submitted by commenters in response to previous NPRM's. For the majority of commodity sectors, however, we relied upon technical expertise provided by process engineers experienced in designing and constructing mineral processing facilities and associated waste management systems.

TABLE 3.—MINERAL PROCESSING SECTORS NOT GENERATING POTENTIALLY HAZARDOUS MINERAL PROCESSING WASTES

Antimony [1]
Barite
Bauxite
Beryllium
Boron
Cadmium
Cerium
Cesium/Rubidium
Chromium
Coal Gas
Gemstones
Gold/Silver
Hydrofluoric Acid
Iron
Lightweight Aggregate
Lithium (from ore)
Magnesium (from ore)
Manganese, Ferromanganese
Phosphoric Acid (wet process)
Silicon, Ferrosilicon
Steel
Strontium
Synthetic Rutile
Titanium Dioxide
Zirconium/Hafnium

[1] From pyrometallurgical operations

For each sector, a brief but systematic review was conducted for the principal or typical processing operation(s), including, for each waste, a waste description, waste generation-to-product ratio estimates, and an assessment of the likelihood of the particular waste exhibiting one or more hazardous waste characteristics. Based upon available information and best professional judgment, 25 of the 43 mineral processing commodity sectors evaluated were found not to generate any solid wastes that are likely to fail characteristic tests for hazard. Because these sectors, which are listed in Table 3, will not suffer economic impacts because of today's final rule, they were not considered further. A total of 18

ATTACHMENT 16

toxicity, and do not fail the test for any other characteristic) are:

(A) Chrome (blue) trimmings generated by the following subcategories of the leather tanning and finishing industry; hair pulp/chrome tan/retan/wet finish; hair save/chrome tan/retan/wet finish; retan/wet finish; no beamhouse; through-the-blue; and shearling.

(B) Chrome (blue) shavings generated by the following subcategories of the leather tanning and finishing industry: Hair pulp/chrome tan/retan/wet finish; hair save/chrome tan/retan/wet finish; retan/wet finish; no beamhouse; through-the-blue; and shearling.

(C) Buffing dust generated by the following subcategories of the leather tanning and finishing industry; hair pulp/chrome tan/retan/wet finish; hair save/chrome tan/retan/wet finish; retan/wet finish; no beamhouse; through-the-blue.

(D) Sewer screenings generated by the following subcategories of the leather tanning and finishing industry: Hair pulp/crome tan/retan/wet finish; hair save/chrome tan/retan/wet finish; retan/wet finish; no beamhouse; through-the-blue; and shearling.

(E) Wastewater treatment sludges generated by the following subcategories of the leather tanning and finishing industry: Hair pulp/chrome tan/retan/wet finish; hair save/chrome tan/retan/wet finish; retan/wet finish; no beamhouse; through-the-blue; and shearling.

(F) Wastewater treatment sludes generated by the following subcategories of the leather tanning and finishing industry: Hair pulp/chrome tan/retan/wet finish; hair save/chrome-tan/retan/wet finish; and through-the-blue.

(G) Waste scrap leather from the leather tanning industry, the shoe manufacturing industry, and other leather product manufacturing industries.

(H) Wastewater treatment sludges from the production of TiO_2 pigment using chromium-bearing ores by the chloride process.

(7) Solid waste from the extraction, beneficiation, and processing of ores and minerals (including coal, phosphate rock and overburden from the mining of uranium ore), except as provided by § 266.112 of this chapter for facilities that burn or process hazardous waste. For purposes of § 261.4(b)(7), beneficiation of ores and minerals is restricted to the following activities: Crushing; grinding; washing; dissolution; crystallization; filtration; sorting; sizing; drying; sintering; pelletizing; briquetting; calcining to remove water and/or carbon dioxide; roasting, autoclaving, and/or chlorination in preparation for leaching (except where the roasting (and/or autoclaving and/or chlorination)/leaching sequence produces a final or intermediate product that does not undergo further beneficiation or processing); gravity concentration; magnetic separation; electrostatic separation; flotation; ion exchange; solvent extraction; electrowinning; precipitation; amalgamation; and heap, dump, vat, tank, and *in situ* leaching. For the purpose of § 261.4(b)(7), solid waste from the processing of ores and minerals includes only the following wastes:

(i) Slag from primary copper processing;

(ii) Slag from primary lead processing;

(iii) Red and brown muds from bauxite refining;

(iv) Phosphogypsum from phosphoric acid production;

(v) Slag from elemental phosphorus production;

(vi) Gasifier ash from coal gasification;

(vii) Process wastewater from coal gasification;

(viii) Calcium sulfate wastewater treatment plant sludge from primary copper processing;

(ix) Slag tailings from primary copper processing;

(x) Fluorogypsum from hydrofluoric acid production;

(xi) Process wastewater from hydrofluoric acid production;

(xii) Air pollution control dust/sludge from iron blast furnaces;

(xiii) Iron blast furnace slag;

(xiv) Treated residue from roasting/leaching of chrome ore;

(xv) Process was
mary magnesium pr
hydrous process;

(xvi) Process wast
phoric acid producti

(xvii) Basic oxyge
hearth furnace air
dust/sludge from ca
tion;

(xviii) Basic oxy
open hearth furnace
steel production;

(xix) Chloride pr
from titanium tetr
tion;

(xx) Slag from pri
ing.

(8) Cement kiln d
as provided by § 266.
ter for facilities that
hazardous waste.

(9) Solid waste whi
carded wood or wood
fails the test for the
teristic solely for ars
not a hazardous was
reason or reasons, if
erated by persons wh
senical-treated wood
ucts for these materi
use.

(10) Petroleum-cont
and debris that fail
toxicity Characteris
Hazardous Waste
through D043 only) a
corrective action r
280 of this chapte

(11) Injected groun
hazardous only becaus
toxicity Characteris
Waste Codes D018 thr
261.24 of this part
through an underg
pursuant to free
recovery operation
oleum refineries,
terminals, p
petroleum pipel
transportation s
25, 1993. This
recovery oper
for which cont
or before M
groundwater return
galleries fro
petroleum refi
terminals, and bul
date six months

ATTACHMENT 17

management of a hazardous waste if all of the following conditions apply:

(1) The hazardous waste is solely a non-RCRA hazardous waste or the hazardous waste or its management is exempt from, or is not otherwise regulated pursuant to, the Resource Conservation and Recovery Act of 1976, as amended, (42 U.S.C. Sec. 6901 et seq.).

(2) The department makes one of the following findings:

(A) The hazardous waste, the amount of the hazardous waste, or the hazardous waste management activity or management unit is insignificant or unimportant as a potential hazard to human health and safety, and the environment.

(B) The handling, processing, or disposal of the hazardous waste, or the hazardous waste management activity, is regulated by another governmental agency in a manner that ensures it will not pose a substantial present or potential hazard to human health and safety, and the environment.

(3) The variance is granted in accordance with this section.

(b) The department may grant a variance only upon receipt of a variance application containing sufficient information to enable the department to determine if all of the conditions required by subdivision (a) are satisfied.

(c) Each variance issued pursuant to this section shall be issued on a form prescribed by the department and shall include, but not be limited to, all of the following:

(1) The name of the producer of the hazardous waste or the owner and operator of the hazardous waste management facility or unit to whom the variance is granted.

(2) A description of the physical characteristics and chemical composition of the hazardous waste or the specifications of the hazardous waste management activity or unit to which the variance applies.

(3) The time period during which the variance is effective.

(4) A specification of the requirements of this chapter or the regulations adopted pursuant to this chapter from which the variance is granted.

(5) A specification of the conditions, limitations, or other requirements to which the variance is subject.

(d) Variances issued pursuant to subdivision (a) are subject to review at the discretion of the department and may be revoked at any time. The department shall revoke a variance if the department finds any of the following:

(1) The conditions required by subdivision (a) are no longer satisfied.

(2) The holder of the variance is in violation of one or more of the conditions, limitations, or other requirements of the variance, and, as a result of the violation, the conditions required by subdivision (a) are no longer satisfied.

(3) If the variance was granted because of the finding specified in subparagraph (B) of paragraph (2) of subdivision (a), the holder of the variance is in violation of one or more of the regulatory requirements of another governmental agency to which the holder is subject and the violation invalidates that finding.

(Amended by Stats. 1992, Ch. 1345)

25143.1. (a) Any geothermal waste resulting from drilling for geothermal resources is exempt from the requirements of this chapter because the disposal of the geothermal wastes is regulated by the California regional water quality control boards.

(b) (1) Wastes from the extraction, beneficiation, and processing of ores and minerals that are not subject to regulation under Subchapter III (commencing with Section 6921) of Chapter 82 of Title 42 of the United States Code are exempt from the requirements of this chapter, except the requirements of Article 9.5 (commencing with Section 25208), as provided in paragraph (2).

(2) The wastes subject to this subdivision are subject to Article 9.5 (commencing with Section 25208) and Chapter 6.8 (commencing with Section 25300) if the wastes would otherwise be classified as hazardous waste pursuant to Section 25117 and the regulations adopted pursuant to Section 25141.

(3) For purposes of this subdivision, the following definitions shall apply:

(A) "Wastes from the extraction, beneficiation, and processing of ores and minerals" means any of the following:

(i) Soil, waste rock, overburden, and any other solid, semisolid, or liquid natural materials that are removed, unearthed, or otherwise displaced as a result of excavating or recovering an ore or a mineral.

(ii) Residuals of ores or minerals after those ores or minerals have been removed, unearthed, or otherwise displaced from their natural sites and physically or chemically treated or otherwise managed in order to separate or concentrate the commercial product present in the ore or mineral, or processed to produce a final marketable product.

(B) "Minerals" has the same meaning as defined in Section 2005 of the Public Resources Code.

(Amended by Stats. 1991, Ch. 174) See also 14[illegible]

Exclusions

25143.2. (a) Recyclable materials are subject to the requirements of this chapter and the regulations adopted by the department to implement this chapter which apply to hazardous wastes, unless the department issues a variance pursuant to Section 25143, or except as provided otherwise in subdivision (b), (c), or (d) or the regulations adopted by the department pursuant to Sections 25150 and 25151. For the purposes of this section, recyclable material does not include infectious waste.

(b) Except as otherwise provided in subdivision (e), (f), and (g), recyclable material which is managed in accordance with Section 25143.9 and is or will be recycled by any of the following methods shall be excluded from classification as a waste:

ATTACHMENT 18

wholesome and potable water. These standards specify maximum contaminant levels:

(1) At the point of delivery to the consumer which may adversely affect the taste, odor or appearance of drinking water.

(2) Which, if exceeded, may cause a substantial number of persons served by the community water system to discontinue its use.

(b) The local health officer shall ensure compliance with the requirements of this article by community water systems with less than 200 service connections and state small water systems.

§ 64473. Maximum Contaminant Levels.

(a) Distribution system water containing substances exceeding the maximum contaminant levels shown in Tables 6 and 7 may be objectionable to an appreciable number of people, but is not generally hazardous to health.

Table 6
Consumer Acceptance Limits—Secondary Drinking Water Standards

Constituents	*Maximum Contaminant Levels*
Color	15 Units
Copper	1.0 mg/l
Corrosivity	Relatively low
Iron	0.3 mg/l
Manganese	0.05 mg/l
Odor—Threshold	3 Units
Foaming Agents (MBAS)	0.5 mg/l
Thiobencarb	1.0 ug/l
Turbidity	5 Units
Zinc	5.0 mg/l

Table 7
Mineralization—Secondary Drinking Water Standards

	Maximum Contaminant Levels		
Constituent, Units	*Recommended*	*Upper*	*Short Term*
Total Dissolved Solids, mg/l	500	1,000	1,500
or			
Specific Conductance, micromhos	900	1,600	2,200
Chloride, mg/l	250	500	600
Sulfate, mg/l	250	500	600

(b) The maximum contaminant levels listed in Table 6:

(1) Shall not be exceeded in:

(A) New community water systems.

(B) New sources developed for existing community water systems.

(2) Shall not be exceeded in existing community water systems. The distribution system water shall be free from significant amounts of particulate matter in all public water systems.

(c) In existing community water systems, if any maximum contaminant level in Table 6 is exceeded, the water supplier, pursuant to Section 4023, Health and Safety Code, may be required, following an investigation by the Department, to conduct a study.

(1) The investigation by the Department shall determine the extent of:

(A) Noncompliance with the maximum contaminant levels.

(B) Consumer dissatisfaction which is based upon the secondary drinking water standards.

(2) The study conducted by the water supplier shall:

(A) Be conducted in a manner and in accordance with a schedule acceptable to the Department and be completed in a period of time not to exceed one year.

(B) Be made by persons acceptable to the Department.

(C) Determine the degree of consumer acceptance of the water supply.

(D) Investigate the causes, methods of correction and estimate the cost of one or more alternative solutions.

(3) The results of the study conducted by the water supplier shall be made available to the:

(A) Users at an appropriately noticed public meeting.

(B) Department.

(C) Public Utilities Commission, if appropriate.

(d) The requirements of (b) (1) (B) and (b) (2) may be waived by the Department following the completion of an investigation as required in (c) based upon, but not necessarily limited to:

(1) Consumer acceptance of water not meeting the maximum contaminant levels shown in Table 6.

(2) Economic considerations.

(e) For the constituents shown on Table 7, no fixed consumer acceptance contaminant level has been established.

(1) Constituent concentrations lower than the Recommended contaminant level are desirable for a higher degree of consumer acceptance.

(2) Constituent concentrations ranging to the Upper contaminant level are acceptable if it is neither reasonable nor feasible to provide more suitable waters.

(3) Constituent concentrations ranging to the Short Term contaminant level are acceptable only for existing systems on a temporary basis pending construction of treatment facilities or development of acceptable new water sources.

(f) New services from systems serving water which carries constituent concentrations between the Upper and Short Term contaminant levels shall be approved only:

(1) If adequate progress is being demonstrated toward providing water of improved mineral quality.

(2) For other compelling reasons approved by the Department.

NOTE: Authority cited: Sections 208 and 4026, Health and Safety Code. Reference: Sections 4017 and 4024, Health and Safety Code.

HISTORY

1. Amendment of subsection (a) (Table 6) filed as an editorial correction 1-18-78; effective thirtieth day thereafter (Register 78, No. 3).
2. Amendment of subsection (a) (Table 6) filed 3-6-89; operative 4-5-89 (Register 89, No. 11).

§ 64475. Distribution System Physical Water Quality.

(a) The water supplier shall determine the physical water quality in the distribution system. This determination may be based upon:

(1) Main flushing operations and flushing records.

(2) Consumer complaint records showing location, nature and duration of the physical water quality problem.

(3) Other pertinent data relative to physical water quality in the distribution system.

(b) The Department may also require the water supplier to take samples for general physical analyses as defined in Section 64433 (a)(2).

(c) Samples, for required general physical analyses, shall be collected from representative points in the distribution system. Samples shall be collected at the following minimum frequencies:

(1) For community water systems with 200 to 1,000 service connections: one sample per month.

(2) For community water systems with greater than 1,000 service connections: one sample for every four bacteriological samples required per month.

(3) For community water systems with less than 200 service connections: as established by the local health officer.

(d) Odor samples required as a part of general physical analyses may be examined in the field as per Section 64415(b).

NOTE: Authority cited: Sections 208 and 4026, Health and Safety Code. Reference: Section 4024, Health and Safety Code.

HISTORY

1. Amendment of subsection (b) filed as an editorial correction 1-18-78; effective thirtieth day thereafter (Register 78, No. 3).
2. New NOTE filed 12-7-84 (Register 84, No. 49).

Article 9. Water Testing Laboratories

§ 64481. Application.

(a) Any person, firm, partnership, association, corporation, or political subdivision of a governmental agency desiring certification as a Water Testing Laboratory shall make application on forms and following instructions supplied by the Department. The applicant shall set forth all pertinent information required by the application and shall furnish any additional information requested by the Department.

(b) The Department shall make a site visit to verify information contained in an application and to secure additional information necessary for evaluation of the application.

NOTE: Authority cited: Sections 208 and 4025, Health and Safety Code. Reference: Section 4025, Health and Safety Code.

ATTACHMENT 19

EAGLE MOUNTAIN MINE
MAILING LIST
Continued

Robert Perdue, Sr. Engr. Geologist
and
LeAnne Chavez, Assoc. WRC Engr.
Colorado River Basin
Regional Water Quality Control Board
73-720 Fred Waring Drive, Suite 100
Palm Desert, CA 92260
FAX: (619) 341-6820

Larry and Donna Charpied
Citizens for the Chuckwalla Valley
P.O. Box 397
Desert Center, CA 92239
FAX: (619) 392-4722

John A. Hinton, Ombudsman
Office of External Affairs
Dept. of Toxic Substances Control
245 W. Broadway, Suite 425
Long Beach CA 90802-4444
FAX: (310) 590-4936

Gerald A. Fawcett, Executive Vice-President
and
Rob Hartman, Environmental Projects Manager
Kaiser Resources, Inc.
8300 Utica Avenue, Suite 301
P.O. Box 2249
Rancho Cucamonga, CA 91729
FAX: (909) 944-4158

Gary Johnson, Senior Vice-President
Mine Reclamation Corp.
960 Tahquitz Canyon, Suite 204
Palm Springs, CA 92262

Kay Ceniceros, Chairperson
Riverside County Board of Supervisors
P.O. Box 1359
Riverside, CA 92502

Dan Roman
and
Robert Roman
44-446 Biskra
Indio, CA 92201

EAGLE MOUNTAIN MINE
MAILING LIST
Continued

Robert Perdue, Sr. Engr. Geologist
and
LeAnne Chavez, Assoc. WRC Engr.
Colorado River Basin
Regional Water Quality Control Board
73-720 Fred Waring Drive, Suite 100
Palm Desert, CA 92260
FAX: (619) 341-6820

Larry and Donna Charpied
Citizens for the Chuckwalla Valley
P.O. Box 397
Desert Center, CA 92239
FAX: (619) 392-4722

John A. Hinton, Ombudsman
Office of External Affairs
Dept. of Toxic Substances Control
245 W. Broadway, Suite 425
Long Beach CA 90802-4444
FAX: (310) 590-4936

Gerald A. Fawcett, Executive Vice-President
and
Rob Hartman, Environmental Projects Manager
Kaiser Resources, Inc.
8300 Utica Avenue, Suite 301
P.O. Box 2249
Rancho Cucamonga, CA 91729
FAX: (909) 944-4158

Gary Johnson, Senior Vice-President
Mine Reclamation Corp.
960 Tahquitz Canyon, Suite 204
Palm Springs, CA 92262

Kay Ceniceros, Chairperson
Riverside County Board of Supervisors
P.O. Box 1359
Riverside, CA 92502

Dan Roman
and
Robert Roman
44-446 Biskra
Indio, CA 92201

LABORATORY REPORT
DEPARTMENT OF TOXIC SUBSTANCES CONTROL
HAZARDOUS MATERIALS LABORATORY - SOUTHERN CALIFORNIA
1449 WEST TEMPLE STREET, LOS ANGELES, CA 90026
TELEPHONE (213) 620 3376

Collector's Name: RICHARD HUBBELL

SCL NO. : 13479-13483,13485, 13486,13486A

Sample Location : EAGLE MOUNTAIN MINE
EAGLE MOUNTAIN MINE DESERT CENTER 92237

DATE REPORTED : 02/25/94

Analytical Procedures Used : EPA 8270

GC/MS SEMIVOLATILE ORGANICS ANALYSIS

											QUANTITATION LIMIT		
	SCL NO.	Method Blank	13479	13480	13481	13482	13383	13485	13486	13486A	Method Blank	13479 13480 13481 13483 13485 13486 13486A	13482
	COL.NO.		SH-1A	EC-1A	SH-2A	SC-1A	SC-2A	EPS-1A	OBP-1A	OBP-2A			
	MATRIX	SAND	SOIL	SOIL	SOIL	SOIL	SOIL	SOIL	SOIL	SOIL			
COMPOUNDS	UNIT	MG/KG	MG/KG	MG/KG	MG/KG	MG/KG	MG/KG	MG/KG	MG/KG	MG/KG	MG/KG	MG/KG	MG/KG
	CAS No.												
1,3-DICHLOROBENZENE	541-73-1	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
BIS(2-CHLOROETHYL) ETHER	111-44-4	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
1,4-DICHLOROBENZENE	106-46-7	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
1,2-DICHLOROBENZENE	95-50-1	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
HEXACHLOROETHANE	67-72-1	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
BIS(2-CHLOROISOPROPYL)ETHER	39638-32-9	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
N-NITROSO-DI-N-PROPYLAMINE	621-64-7	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
NITROBENZENE	98-95-3	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
ISOPHORONE	78-59-1	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
1,2,4-TRICHLOROBENZNE	120-82-1	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
BIS(2-CHLOROETHOXY) METHANE	111-91-1	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
HEXACHLOROBUTADIENE	87-68-3	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
HEXACHLOROCYCLOPENTADIENE	77-47-4	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
2-CHLORONAPHTHALENE	91-58-7	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
DIMETHYLPHTHALATE	131-11-3	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
2,6-DINITROTOLUENE	606-20-2	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
4-CHLOROPHENYL PHENYL ETHER	7005-72-3	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
2,4-DINITROTOLUENE	121-14-2	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
DIETHYL PHTHALATE	84-66-2	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10

NOTE : QUANTITATION LIMIT = (CONCENTRATION OF THE LOWEST CALIBRATION STANDARD) TIMES (DILUTION FACTOR)
ND = NOT DETECTED

SAMPLE PREPARATION

NOEMI COSON

ANALYST

MARY NEE

LABORATORY REPORT
DEPARTMENT OF TOXIC SUBSTANCES CONTROL
HAZARDOUS MATERIALS LABORATORY - SOUTHERN CALIFORNIA
1449 WEST TEMPLE STREET, LOS ANGELES, CA 90025
TELEPHONE (213) 620 3376

13479-13483
SCL NO. 13485,13486,13486A

GC/MS SEMIVOLATILE ORGANICS ANALYSIS

COMPOUNDS	SCL NO.	Method Blank	13479	13480	13481	13482	13483	13485	13486	13486A	QUANTITATION LIMIT Method Blank	QUANTITATION LIMIT 13479 13480 13481 13483 13485 13486 13486A	QUANTITATION LIMIT 13482
	COL.NO.		SH-1A	EC-1A	SH-2A	SC-1A	SC-2A	EPS-1A	OBP-1A	OBP-2A			
	MATRIX	SAND	SOIL	SOIL	SOIL	SOIL	SOIL	SOIL	SOIL	SOIL			
	UNIT	MG/KG	MG/KG	MG/KG	MG/KG	MG/KG	MG/KG	MG/KG	MG/KG	MG/KG	MG/KG	MG/KG	MG/KG
CAS No.													
N-NITROSODIPHENYLAMINE	80-30-6	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
4-BROMOPHENYL PHENYL ETHER	101-55-3	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
HEXACHLOROBENZENE	118-74-1	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
DI-N-BUTYL PHTHALATE	84-74-2	ND	ND	ND	ND	ND	ND	ND	ND	ND	20	20	40
BUTYL BENZYL PHTHALATE	85-68-7	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
BIS(2-ETHYL HEXYL) PHTHALATE	117-81-7	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
3,3-DICHLOROBENZIDINE	91-94-1	ND	ND	ND	ND	ND	ND	ND	ND	ND	20	20	40
DI-N-OCTYL PHTHALATE	117-84-0	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
NAPHTHALENE	91-20-3	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
ACENAPHTHYLENE	208-96-8	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
ACENAPHTHENE	83-32-9	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
FLUORENE	86-73-7	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
PHENANTHRENE	85-01-08	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
ANTHRACENE	120-12-7	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
FLUORANTHENE	206-44-0	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
PYRENE	129-00-0	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
BENZO(a)ANTHRACENE	56-55-3	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
CHRYSENE	218-01-9	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
BENZO(b)FLUORANTHENE	205-99-2	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
BENZO(k)FLUORANTHENE	207-08-9	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
BENZO(a)PYRENE	50-32-8	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
INDENO(1,2,3-cd)PYRENE	193-39-5	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
DIBENZ(a,h)ANTHRACENE	50-70-3	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10
BENZO(ghi)PERYLENE	191-24-2	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	5	10

Note: ND = NOT DETECTED

SAMPLE PREPARTION

NOEMI COSON

ANALYST

MARY NEE

Continue on next page

LABORATORY REPORT
DEPARTMENT OF TOXIC SUBSTANCES CONTROL
HAZARDOUS MATERIALS LABORATORY - SOUTHERN CALIFORNIA
1449 WEST TEMPLE STREET, LOS ANGELES, CA 90026
TELEPHONE (213) 620-3376

SCL NO. 13479 13483 13485,13486,13486A

GC/MS SEMIVOLATILE ORGANICS ANALYSIS

COMPOUNDS	SCL NO.	Method Blank	13479	13480	13481	13482	13483	13485	13486	13486A	QUANTITATION LIMIT Method Blank	13479 13480 13481 13483 13485 13486 13486A	13482
	COL.NO.		SH-1A	EC-1A	SH-2A	SC-1A	SC-2A	EPS-1A	OBP-1A	OBP-2A			
	MATRIX	SAND	SOIL	SOIL	SOIL	SOIL	SOIL	SOIL	SOIL	SOIL			
	UNIT	MG/KG	MG/KG	MG/KG	MG/KG	MG/KG	MG/KG	MG/KG	MG/KG	MG/KG	MG/KG	MG/KG	MG/KG
2-CHLOROPHENOL	CAS No. 95-57-8	ND	ND	ND	ND	ND	ND	ND	ND	ND	10	10	20
PHENOL	108-95-2	ND	ND	ND	ND	ND	ND	ND	ND	ND	10	10	20
2-NITROPHENOL	88-75-5	ND	ND	ND	ND	ND	ND	ND	ND	ND	10	10	20
2,4-DIMETHYL PHENOL	105-67-9	ND	ND	ND	ND	ND	ND	ND	ND	ND	10	10	20
2,4-DICHLOROPHENOL	120-83-2	ND	ND	ND	ND	ND	ND	ND	ND	ND	10	10	20
4-CHLORO-3-METHYL PHENOL	59-50-7	ND	ND	ND	ND	ND	ND	ND	ND	ND	10	10	20
2,4,6-TRICHLOROPHENOL	88-06-2	ND	ND	ND	ND	ND	ND	ND	ND	ND	10	10	20
2,4 DINITROPHENOL	51-28-5	ND	ND	ND	ND	ND	ND	ND	ND	ND	50	50	100
2 METHYL-4,6-DINITROPHENOL	534-52-1	ND	ND	ND	ND	ND	ND	ND	ND	ND	50	50	100
4 NITROPHENOL	100-02-7	ND	ND	ND	ND	ND	ND	ND	ND	ND	50	50	100
PENTACHLOROPHENOL	87-86-5	ND	ND	ND	ND	ND	ND	ND	ND	ND	50	50	100
BENZYL ALCOHOL	100-51-6	ND	ND	ND	ND	ND	ND	ND	ND	ND	10	10	20
2-METHYLPHENOL	95-48-7	ND	ND	ND	ND	ND	ND	ND	ND	ND	10	10	20
4 METHYLPHENOL	106-44-5	ND	ND	ND	ND	ND	ND	ND	ND	ND	10	10	20
BENZOIC ACID	65-85-0	ND	ND	ND	ND	ND	ND	ND	ND	ND	50	50	100
4 CHLOROANILINE	106-47-8	ND	ND	ND	ND	ND	ND	ND	ND	ND	10	10	20
2 METHYL NAPHTHALENE	91-57-6	ND	ND	ND	ND	ND	ND	ND	ND	ND	10	10	20
2,4,5-TRICHLOROPHENOL	95-95-4	ND	ND	ND	ND	ND	ND	ND	ND	ND	10	10	20
2-NITROANILINE	88-74-4	ND	ND	ND	ND	ND	ND	ND	ND	ND	20	20	40
DIBENZOFURAN	132-64-9	ND	ND	ND	ND	ND	ND	ND	ND	ND	10	10	20
3-NITROANILINE	99-09-2	ND	ND	ND	ND	ND	ND	ND	ND	ND	20	20	40
4-NITROANILINE	100-01-6	ND	ND	ND	ND	ND	ND	ND	ND	ND	50	50	100

TENTATIVELY IDENTIFIED COMPOUNDS : ALIPHATIC HYDROCARBONS(C19-C22 & UP);CYCLIC HYDROCARBONS WERE ALSO PRESENT IN SAMPLE 13482.

NOTE: ND = NOT DETECTED

SAMPLE PREPARATION — NOEMI COSON — Date 3/7/94

ANALYST — MARY NEE — Date 3/7/94

SUPERVISING CHEMIST — RUSS CHIN — Date 3/

QUALITY CONTROL (QC) REPORT
DEPARTMENT OF TOXIC SUBSTANCES CONTROL
HAZARDOUS MATERIALS LABORATORY - SOUTHERN CALIFORNIA
1449 WEST TEMPLE STREET LOS ANGELES CA. 90026
TEL:(213) 620-3376

COLLECTOR'S NAME : RICHARD HUBBELL

DATE SAMPLE RECEIVED: 02/15/94

SAMPLING LOCATION: EAGLE MOUNTAIN MINE
EAGLE MOUNTAIN MINE DESERT CENTER 92237

DATE SAMPLE PREPARED: 02/17 23/94

ANALYTICAL BATCH LAB ID NO.: SCL 13479-13483,13485,13486,13486A

DATE SAMPLE ANALYZED: 02/24,25/94

ANALYTICAL PROCEDURES USED: EPA METHOD 8270 GC/MS FOR SEMIVOLATILE ORGANICS
EPA METHOD 3540 SOXHLET EXTRACTION
EPA METHOD 3640 GEL PERMEATION COLUMN CLEANUP

QC REPORT FOR

A: METHOD STANDARD
B: LABORATORY CONTROL SAMPLE
C: DUPLICATE SAMPLE ANALYSIS

	A		B	
	METHOD STANDARD RECOVERY FOR EPA 3540	CONTROL LIMITS FOR METHOD STANDARD % RECOVERY	LAB CONTROL SAMPLE ID NO: LCS-BNA-1-0492 LCS-BNA-2-0492	
			Found	Control Limit
COMPOUND	%	%	mg/kg	mg/kg
PHENOL	100	59.8-117	709	485-940
2 CHLOROPHENOL	95	50.7-137	566	373-831
1,4-DICHLOROBENZENE	66	25.8-107	322	312-534
N-NITROSO-DI-N-PROPYLAMINE	94	60.8-115	1042	584-1154
1,2,4-TRICHLOLROBENZENE	90	48.2-115	490	418-774
4 CHLORO-3-METHYL PHENOL	99	68.6-117	835	672-936
ACENAPHTHENE	103	77.8-111	564	424-835
4-NITROPHENOL	100	60.0-128	931	508-1151
2,4-DINITROTOLUENE	104	73.0-119	806	578-1063
PENTACHLOROPHENOL	97	64.7-125	829	589-1020
PYRENE	114	73.1-117	552	386-820

C			
DULPICATE SAMPLE ANALYSIS			
Performed on SCL 13480	Matrix	SOIL	
	Run 1	Run 2	RPD
COMPOUND	mg/kg	mg/kg	%
NO DATA(ANALYTE WAS NOT DETECTED OR BELOW QUANTITATION LIMIT)	-	-	
CONTROL LIMIT			0-20

SAMPLE PREPARATION:

NOEMI COSON DATE 3/7/94

ANALYST:

MARY NEE DATE 3/7/94

SUPERVISING CHEMIST

RUSS CHIN DATE

QUALITY CONTROL (QC) REPORT
DEPARTMENT OF TOXIC SUBSTANCES CONTROL
HAZARDOUS MATERIALS LABORATORY - SOUTHERN CALIFORNIA
1449 WEST TEMPLE STREET, LOS ANGELES CA. 90026
TEL:(213) 620-3376

COLLECTOR'S NAME : RICHARD HUBBELL

SAMPLING LOCATION: EAGLE MOUNTAIN MINE
EAGLE MOUNTAIN MINE DESERT CENTER 92237

ANALYTICAL BATCH LAB ID NO.: SCL 13479-13483,13485,13486,13486A

ANALYTICAL PROCEDURES USED: EPA METHOD 8270 GC/MS FOR SEMIVOLATILE ORGANICS
EPA METHOD 3540 SOXHLET EXTRACTION
EPA METHOD 3640 GEL PERMEATION COLUMN CLEANUP

DATE SAMPLE RECEIVED: 02/15/94

DATE SAMPLE PREPARED: 02/17 23/94

DATE SAMPLE ANALYZED: 02/24,25/94

QC REPORT FOR

MATRIX SPIKE(MS)/MATRIX SPIKE DUPLICATE(MSD) PERCENT RECOVERY

MATRIX SPIKE REFORMED ON SCL 13480 TYPE OF MATRIX SOIL

COMPOUND	AMOUNT OF ANALYTE IN SAMPLE	AMOUNT ANALYTE ADDED	MATRIX SPIKE		MATRIX SPIKE DUPLICATE		AVE	CONTROL LIMITS FOR % REC	R % D BETWEEN MS/MSD	[illegible]
			AMOUNT RECOVERED	% REC	AMOUNT RECOVERED	% REC	% REC			
	MG/KG	MG/KG	MG/KG	%	MG/KG	%	%	MG/KG	%	%
PHENOL	<10	1000	976	98	987	99	98	57.0-125	1.0	0-20
2-CHLOROPHENOL	<10	1000	972	97	972	97	97	54.9-118	0	0-20
1,4 DICHLOROBENZENE	<5	500	405	81	418	84	82	38.3-117	3.6	0-20
N NITROSO-DI-N-PROPYLAMINE	<5	500	453	91	460	92	92	48.7-137	1.1	0-20
1,2,4-TRICHLOROBENZENE	<5	500	462	92	465	93	92	63.3-107	1.1	0-20
4 CHLORO-3-METHYL PHENOL	<10	1000	944	94	970	97	96	60.8-132	3.1	0-20
ACENAPHTHENE	<5	500	492	98	498	100	99	74.4-114	2.0	0-20
4 NITROPHENOL	<50	1000	999	100	1026	103	102	35.5-148	2.9	0-20
2,4-DINITROTOLUENE	<5	500	485	97	495	99	98	54.3-129	2.0	0-20
PENTACHLOROPHENOL	<50	1000	978	98	988	99	98	48.5-134	1.0	0-20
PYRENE	<5	500	559	112	534	107	110	52.4-131	4.5	0-20

SAMPLE PREPARATION ANALYST SUPERVISING CHEMIST

NOEMI COSON 3/7/94 DATE MARY NEE 3/7/94 DATE RUSS CHIN DATE

QUALITY CONTROL (QC) REPORT
DEPARTMENT OF TOXIC SUBSTANCES CONTROL
HAZARDOUS MATERIALS LABORATORY - SOUTHERN CALIFORNIA
1449 WEST TEMPLE STREET, LOS ANGELES CA. 90026
TEL:(213) 620-3376

COLLECTOR'S NAME : RICHARD HUBBELL

SAMPLING LOCATION: EAGLE MOUNTAIN MINE
EAGLE MOUNTAIN MINE DESERT CENTER 92237

ANALYTICAL BATCH LAB ID NO.: SCL 13479-13483,13485,13486,13486A

ANALYTICAL PROCEDURES USED: EPA METHOD 8270 GC/MS FOR SEMIVOLATILE ORGANICS
EPA METHOD 3540 SOXHLET EXTRACTION
EPA METHOD 3640 GEL PERMEATION COLUMN CLEANUP

DATE SAMPLE RECEIVED:02/15/94

DATE SAMPLE PREPARED:02/17 23/94

DATE SAMPLE ANALYZED:02/24,25/94

QC REPORT FOR SEMIVOLATILE SURROGATE RECOVERY

	2-FLUOROPHENOL			PHENOL-d6			NITROBENZENE-d5			2-FLUOROBIPHENYL			2,4,6-TRIBROMOPHENOL		
	ADDED	RECOVERED		ADDED	RECOVERED		ADDED	RECOVERED		ADDED	RECOVERED		ADDED	RECOVERED	
QC SAMPLES / SAMPLE NO.	MG/KG	MG/KG	% REC	MG/KG	MG/KG	% REC	MG/KG	MG/KG	% REC	MG/KG	MG/KG	% REC	MG/KG	MG/KG	% REC
METHOD BLANK	200	163	81	200	182	91	100	85	85	100	102	102	200	165	83
METHOD STANDARD	200	186	93	200	195	97	100	95	95	100	100	100	200	196	98
MATRIX SPIKE	1000	1000	100	1000	985	98	500	492	98	500	501	100	1000	969	97
MATRIX SPIKE DUPLICATE	1000	986	99	1000	992	99	500	489	98	500	507	101	1000	949	[illegible]
LAB CONTROL SAMPLE(LCS)	1000	897	[illegible]	1000	958	96	500	475	95	500	477	95	1000	926	93
SCL 13479	200	179	90	200	187	93	100	91	91	100	102	102	200	165	83
SCL 13480	200	181	90	200	188	94	100	92	92	100	100	100	200	155	77
SCL 13480 DUPLICATE	200	197	98	200	196	98	100	97	97	100	102	102	200	163	81
SCL 13481	200	179	89	200	186	93	100	94	94	100	101	101	200	149	74
SCL 13482	200	183	92	200	187	94	100	92	92	100	108	108	200	155	77
SCL 13483	200	184	92	200	190	95	100	95	95	100	100	100	200	166	83
SCL 13485	200	177	88	200	184	92	100	89	89	100	97	97	200	163	81
SCL 13486	200	188	94	200	195	98	100	94	94	100	100	100	200	165	82
SCL 13486A	200	170	85	200	182	91	100	90	90	100	101	101	200	166	83
CONTROL LIMIT FOR %REC	38.6-149			56.7-141			38.2-138			60.1-123			41.6 1[illegible]		

SAMPLE PREPARATION: NOEMI COSON — DATE 3/7/94

ANALYST: MARY NEE — DATE 3/7/94

SUPERVISING CHEMIST: RUSS CHIN

ATACHMENT 6

E.S. BABCOCK & SONS, INC.
6100 Quail Valley Court
Riverside, CA 92502
(909) 653-3351
FAX (909) 653-1662

CHAIN OF CUSTODY RECORD

[illegible] + Donna Charpied / [illegible] Hubbell DTSC
Customers

Lab #s: _____ Invoice No. _____

Project No.

Project Name / Location: Eagle Mountain Mine, Eagle Mountain, CA

Samplers: (signature) Richard Hubbell

Description	Sampled Date	Sampled Time	Determination Requested	Number of Containers	Condition of Sample: Sealed	Condition of Sample: Chilled	Condition of Sample: Preserved	Remarks
Soil shovel area SH-1-C	2/10/94	12:00		1	Y	Y	—	Sampler
[illegible] area grass EC-1-C	2/10/94	12:30		1	Y	Y	—	Mark Fuentes DTSC
[illegible] area SH-2-C	2/10/94	1300		1	Y	Y	—	Sample Custodian
Soil scrap staging area SC-1-C	2/10/94	1600		1	Y	Y	—	Rich Hubbell
Soil Central Cueling area wash SC2C	2/10/94	1615		1	Y	Y	—	DTSC
Soil Fine Tailings Pond FTP 1-C	2/11/94	0925		1	Y	Y	—	
East Pit Storage EPS-1-C	2/11/94			1	Y	Y	—	Evidence tape
Open burn pit OPB-1-C	2/11/94			1	Y	Y	—	intact
Open burn pit OPB 2-C	2/11/94			1	Y	Y	—	

Relinquished By:	Date/Time	Received By:	Relinquished By:	Date/Time	Received By:
Richard Hubbell	2/11/94 0650				

Relinquished By:	Date/Time	Received By:	Received For Lab By:	Date / Time

ATTACHMENT 7

STATE OF CALIFORNIA—ENVIRONMENTAL PROTECTION AGENCY

DEPARTMENT OF TOXIC SUBSTANCES CONTROL
400 P Street, 4th Floor
P.O. Box 806
Sacramento, CA 95812-0806

Post-It™ brand fax transmittal memo 7671 | # of pages ▸ 4

To Chris Guerre	From Bill Owen
Co. DTSC	Co.
Dept. FPB - GSU	Phone # Calnet 494 2406
Fax # 8 635 5511	Fax #

M E M O R A N D U M

TO: Christopher Guerre
Geological Services Unit, Region 4

FROM: William Owen *Will Owen*
Geological Services Unit, Headquarters

DATE: February 22, 1994

SUBJECT: Results of Magnetometer Profiles, Eagle Mountain Mine

---

This memo summarizes the results of two magnetometer profiles recorded at the Eagle Mountain Mine, near Desert Center in Riverside County, California. These profiles were recorded on February 10 and 11, 1994, during a facility inspection conducted by the Region 4 Surveillance and Enforcement Branch, to screen areas suspected to contain buried ferromagnetic objects (i.e., drums or other waste containers).

Due to the widespread presence of magnetite ore tailings throughout the site, I could not assure reliable magnetic data from this site. Additionally, time constraints associated with the inspection would not allow detailed grid surveying. Therefore, rather than conduct grid surveys (which could yield considerably more data), I made one profile over each suspected area to screen for possible buried ferromagnetic objects. The results from these profiles, if negative, could not conclusively rule out the presence of buried objects. If positive, however, this information could be used to guide soil sampling locations during the inspection.

The profile data are shown in figures 1 and 2. Figure 1, from the Electric Scoop area, shows a sinusoidal anomaly that is often characteristic of a dipole source (most ferromagnetic objects behave as dipoles); however, the orientation of the high and low points on the profile is opposite of predicted for an induced dipole. This creates two contradictory interpretations: 1) the anomaly is not caused by buried iron or steel, or 2) if caused by iron or steel, the buried object(s) have a high degree of permanent magnetization. Given the presence of large amounts of magnetite at the site and the high permanent magnetization common to iron and steel, either interpretation is plausible.

Figure 2 shows the profile recorded from the Burn Pit Area. This profile shows a westerly increasing trend in total field intensity, with a spike of about 125 nanoteslas between 175 and

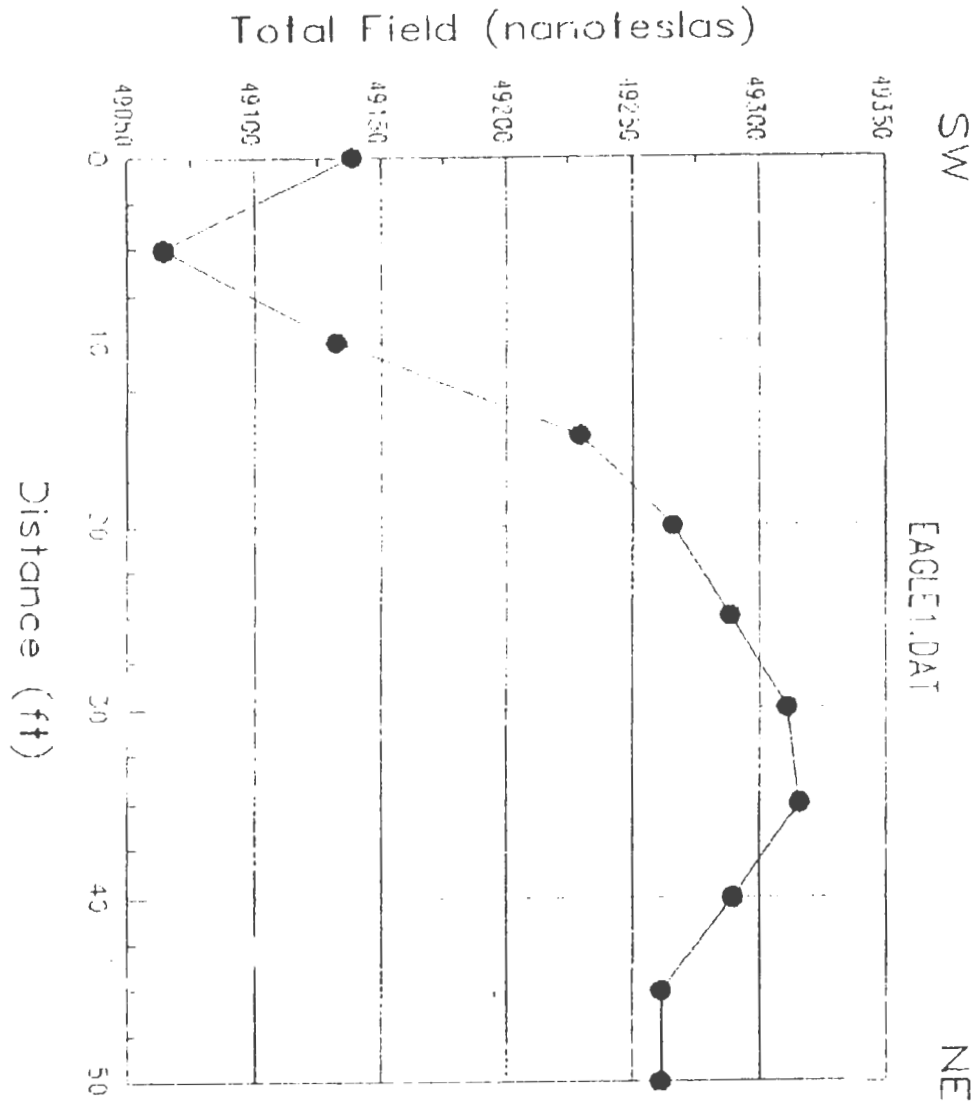
250 feet. This interval is near a suspected former waste disposal trench, and the observed spike could be related to the presence of buried iron or steel objects. However, the suspected trench is on a large pile of mine tailings; therefore, this single profile cannot be considered conclusive evidence of buried iron or steel.

Unfortunately, the presence of magnetic noise from the ore tailings and the limited magnetic profile data could not enable reliable interpretation. However, the data may be augmented by running grid surveys. This would allow better analysis of the shape and amplitude of the magnetic anomalies and hopefully lead to a more reliable interpretation. Pending analytical results of soil samples collected from the Electric Scoop and Burn Pit areas, if these areas are still of interest a more detailed grid survey using a magnetometer may provide helpful information.

I appreciated the opportunity to visit this site and provide you with assistance. If you have any questions or need additional assistance, please call me at (916) 255-2106 (CALNET 494-2106).

cc: Mark Fuentes
Region 4 SEB

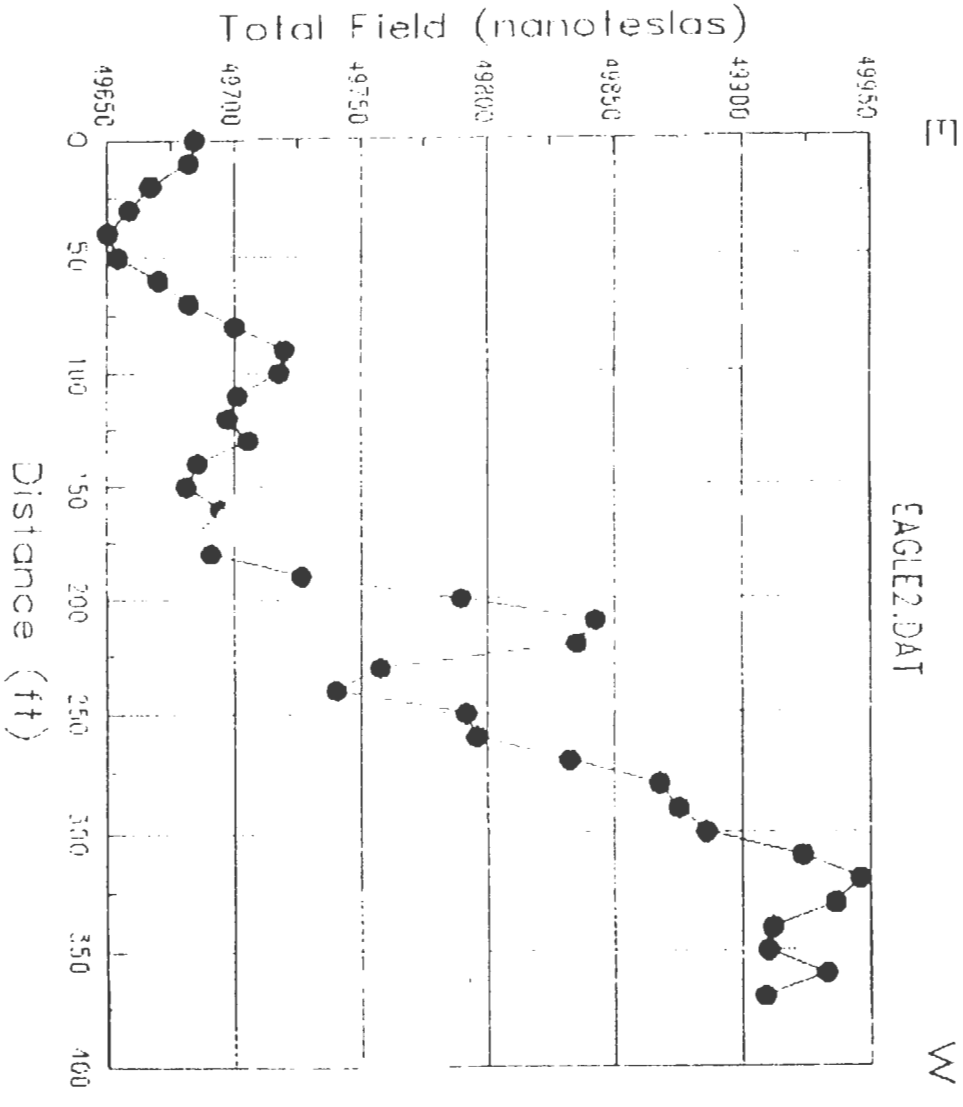
Chris Guerre
February 22, 1994
Page 3



Profile of total field magnetic intensity. Electric Scooo Area

FIGURE 1

Chris Guerre
February 22, 1994
Page 4

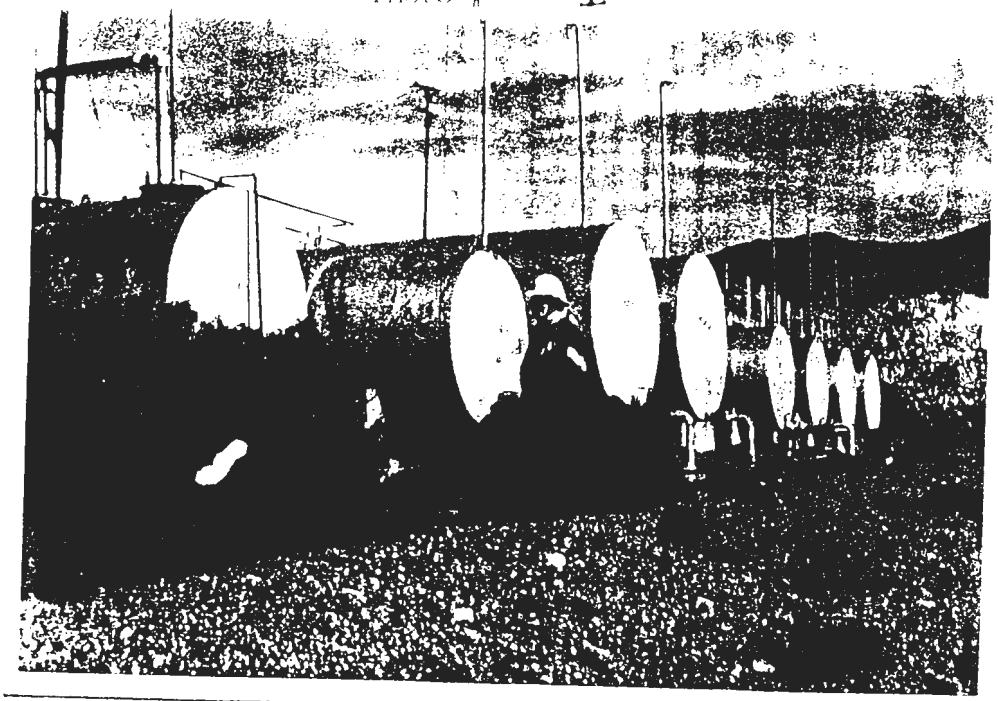


Profile of total field magnetic intensity, Burn Pit Area

FIGURE 2

ATTACHMENT 8

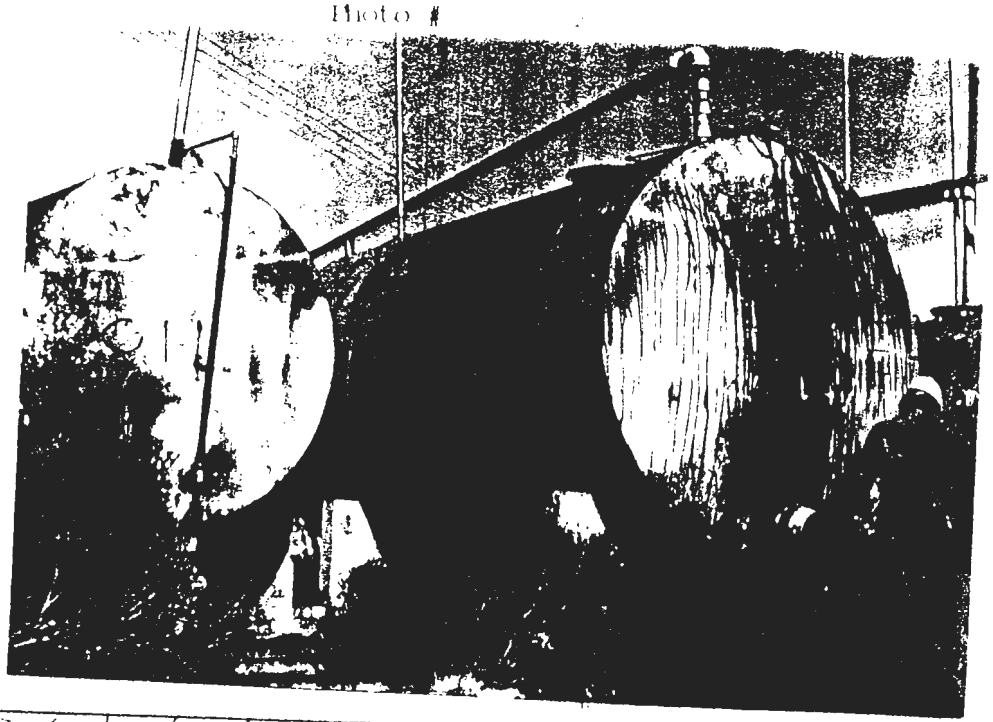
Photo # 1



Comments:

[illegible] Eagle Mountain Mine, Central Pit Fueling Station [illegible] diesel and hydraulic fluid storage tanks. All tanks [illegible] Lowell Hall [illegible] the tanks. Picture shows [illegible] Rich [illegible]

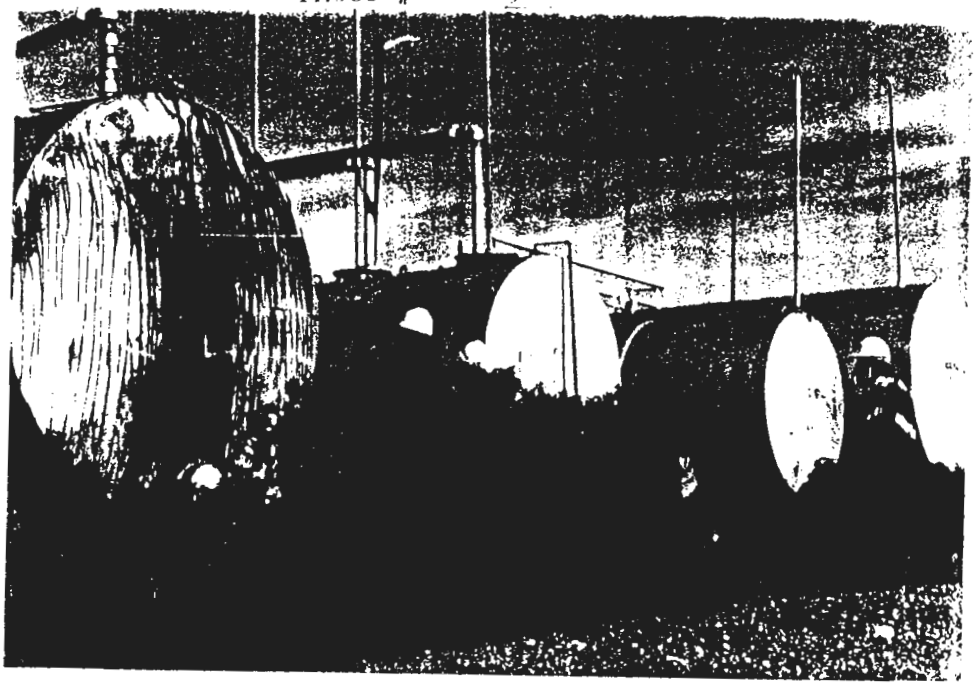
Photo #



Comments:

[illegible] Eagle Mountain Mine, Central Pit Fueling Station [illegible]

Photo # 3

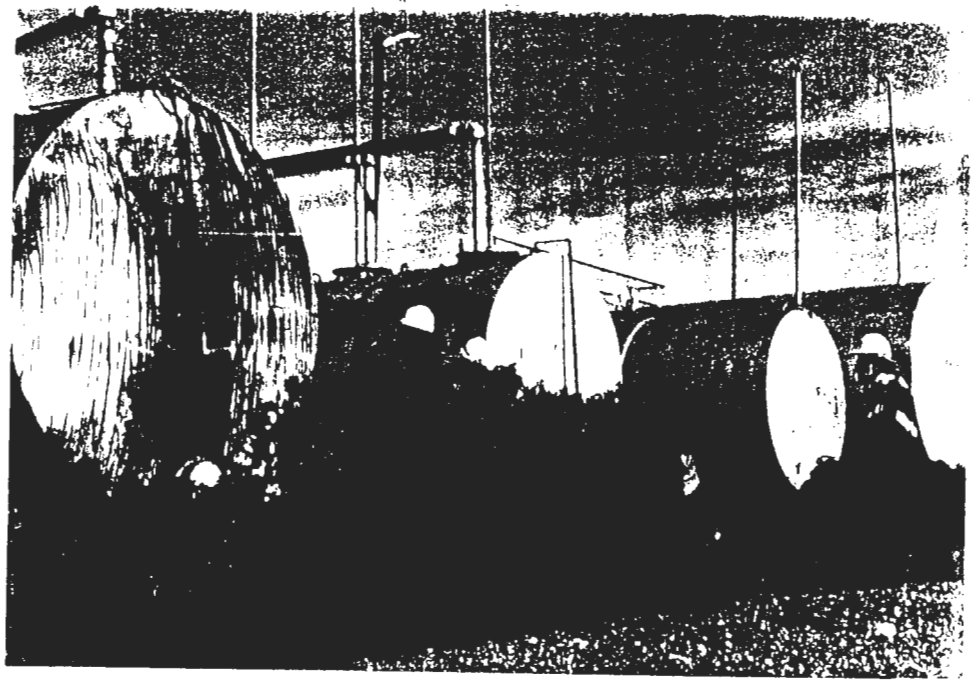


Comments:
[illegible] Eagle Mountain Mine Central Pit Fueling Station [illegible] diesel and hydraulic fluid storage tanks.

Photo # 4

Comments:
[illegible] Eagle Mountain Mine Central Pit Fueling Station [illegible] station in center.

Photo # 5



Comments:

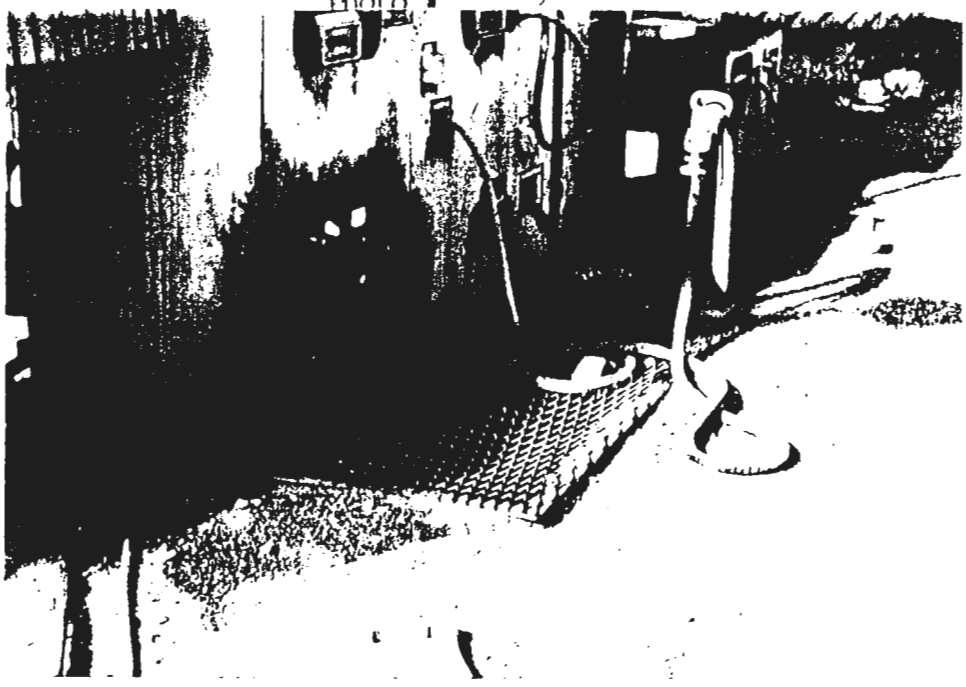
[illegible] Eagle Mountain [illegible] Central Pit Fueling Station [illegible] [illegible] and [illegible] [illegible] storage tanks.

Photo # 4

Comments:

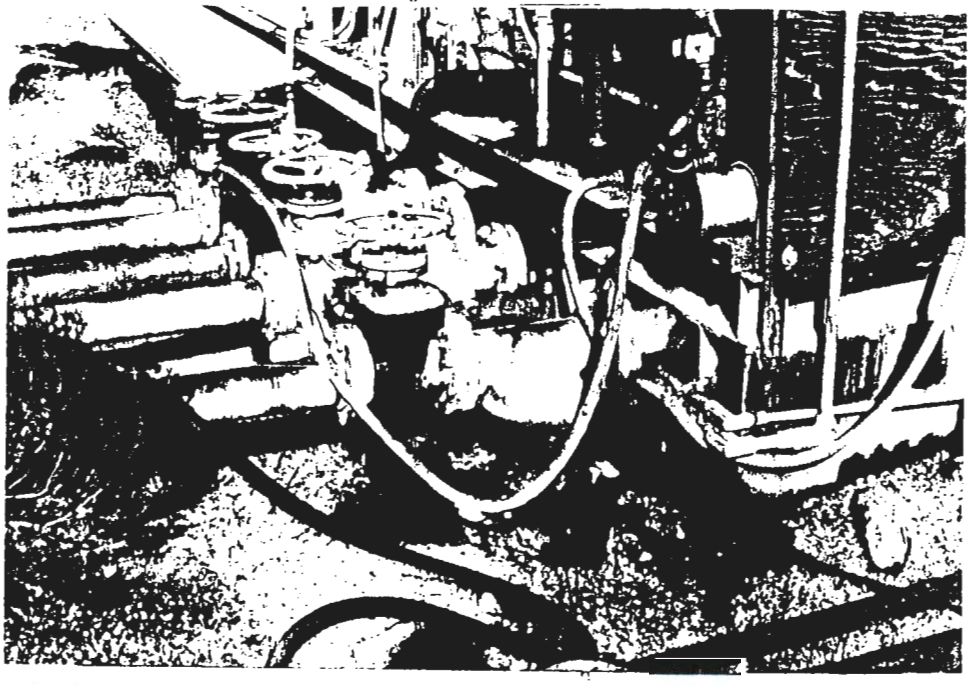
[illegible] Eagle Mountain [illegible] Central Pit Fueling Station [illegible]

Photo # 5



Comments:
2/10/94 Eagle Mountain Mine Central Pit Fueling Station.
Surface staining at the service station.
Photographer: Rich Hubbell

Photo # 6

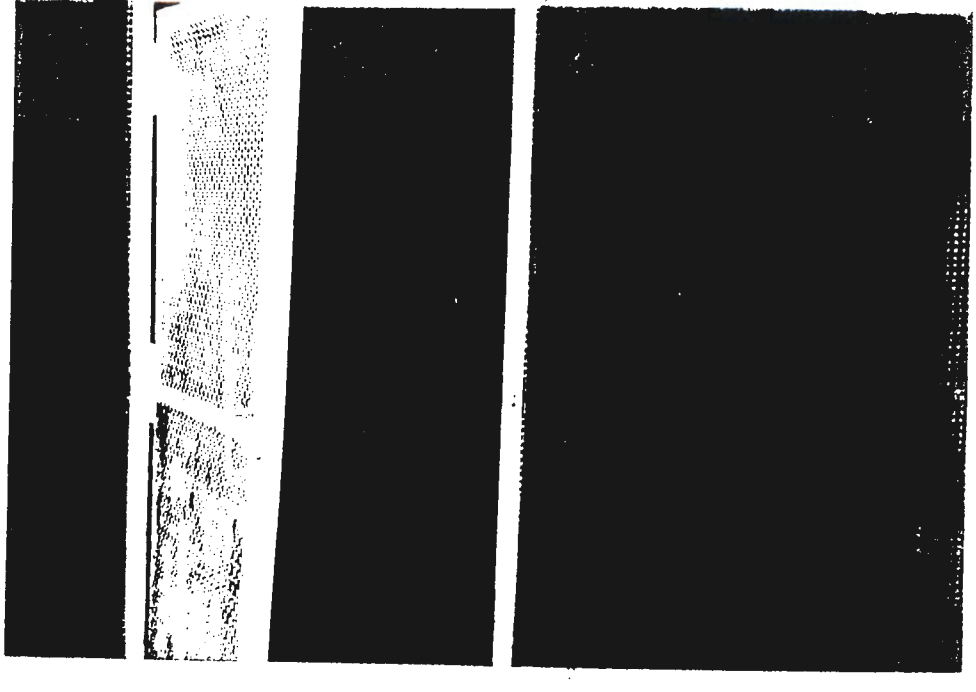


Comments:
2/10/94 Eagle Mountain Mine Central Pit Fueling Station - Service Station. Soil contamination from parking valves and connections. Petrol, solvent, hydraulic fluid.
Photographer: Rich Hubbell

Photo # 7

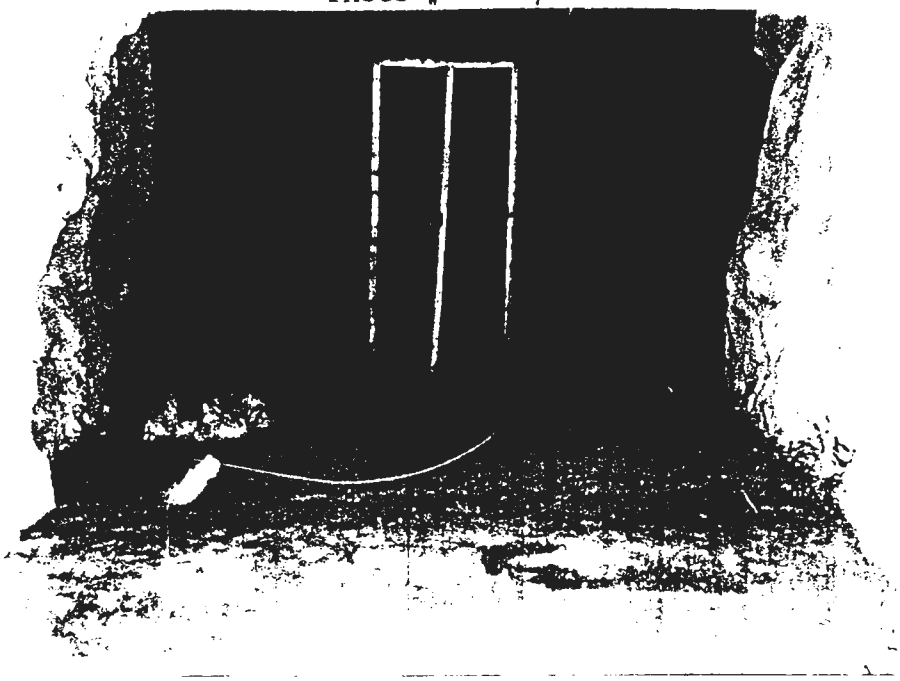
Comments: 2/10/94 Eagle Mountain Mine.
Underground Entrance - No hazardous waste was observed inside
Photographer: Rich Hubbell

Photo # 8



Comments:
[illegible] Eagle Mountain Mine - Exploring Storage Magazine [illegible]
[illegible]
Photographer: Rich Hubbell

Photo # 9



Comments:
Eagle Mountain Mine Explosives Magazine near the Underpass.
2/10/94.
Photographer: Rich Hubbell

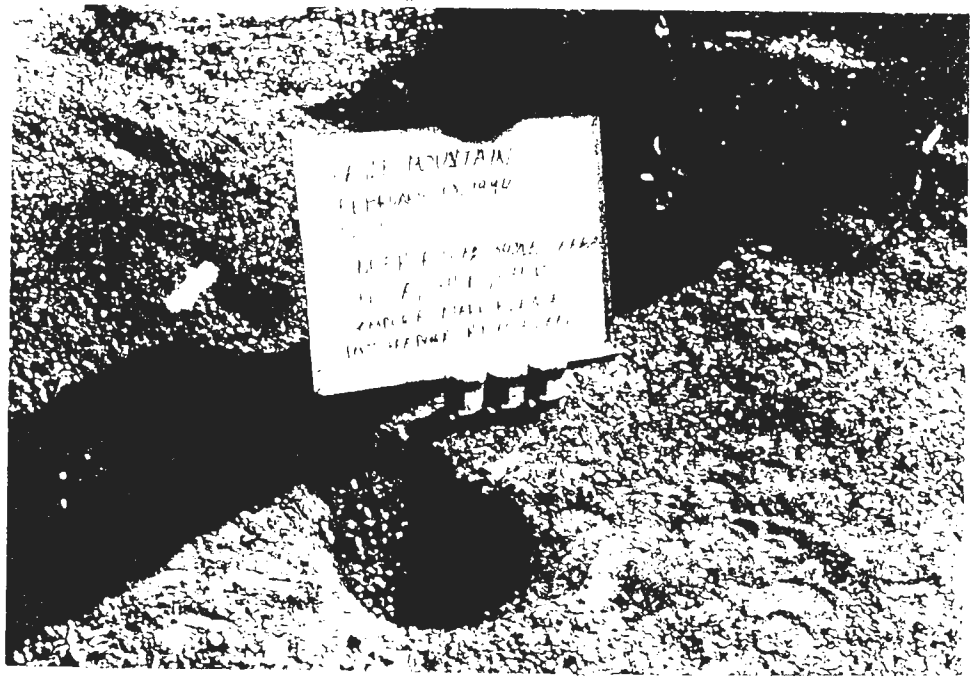
Photo # 10

Comments: 2/10/94
Eagle Mountain Mine - Roadside location between the Underground and the Explosives Magazine. Surface contamination caused by disposal of "Gator" lubricating grease.
Photographer: Rich Hubbell

Photo #

Comments: [illegible]

Photo #

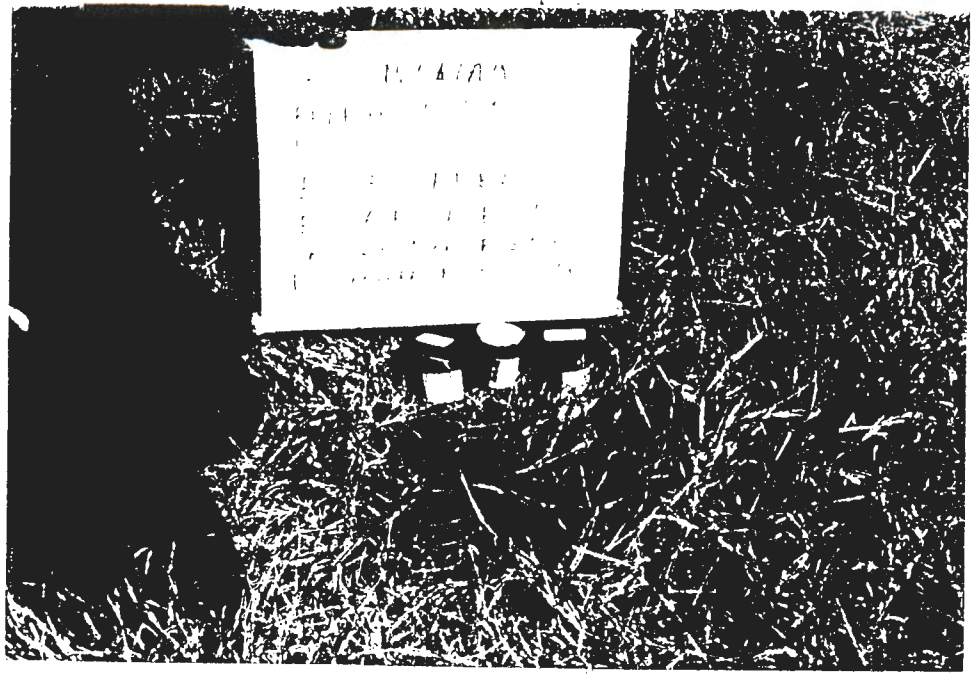


Comments: _____

Photo # [illegible]

Comments: [illegible] Eagle Mountain [illegible] Eagle Creek [illegible] Bill [illegible] [illegible] magnetometer [illegible] [illegible] buried [illegible] [illegible] "Rich Rubble"

Photo # [illegible]



Comments: [illegible] Eagle Creek [illegible]

Photo # 2

Comments: [illegible]

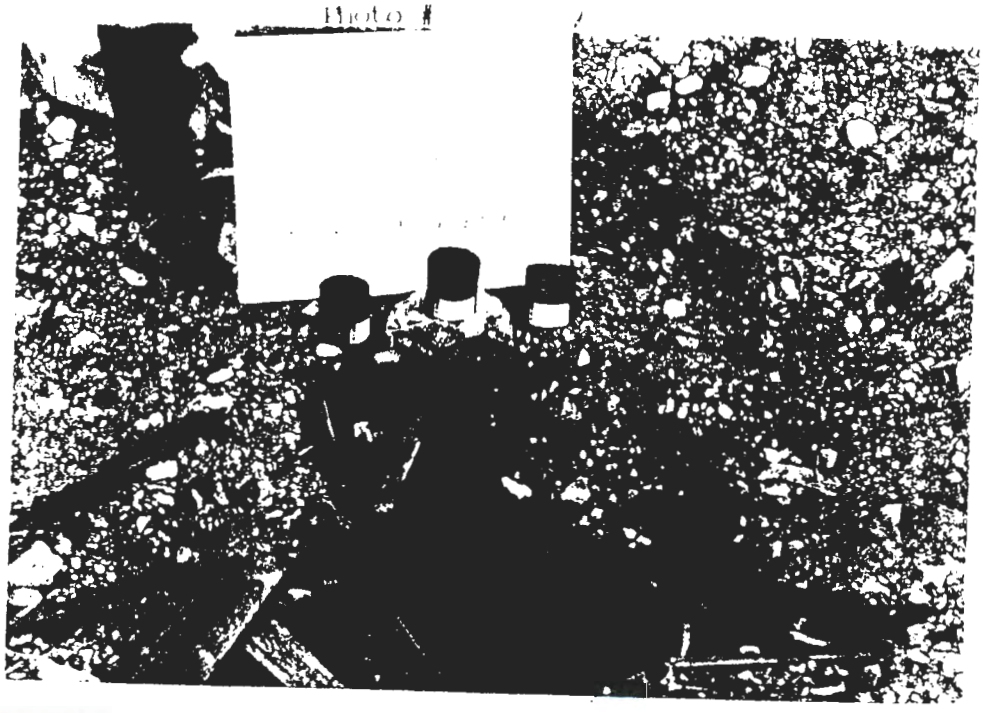
Photo # [illegible]

Comments: [illegible]

Photo #

Caption:

Photo #



Caption:

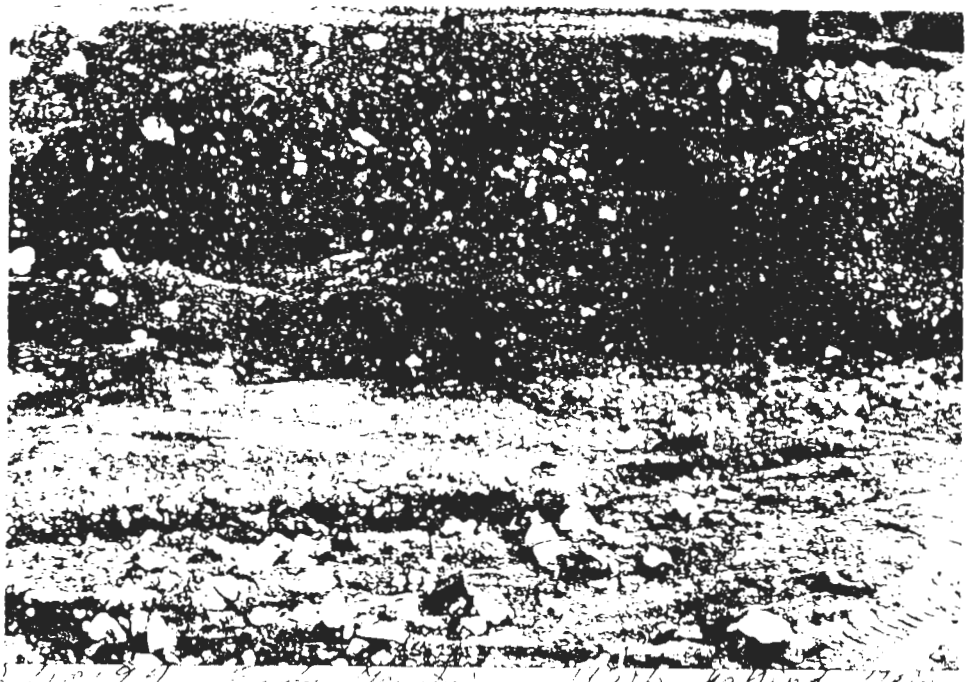
Photo # 19

Comments:
2/[illegible]/94 Main Shop Fueling Area creek/wash behind [illegible]
[illegible] Contaminated Soil Rani Patele using Anu to sum,
[illegible] organic fumes. John Fanning assisting.
photographer: Rich Hubbell

Photo # 20

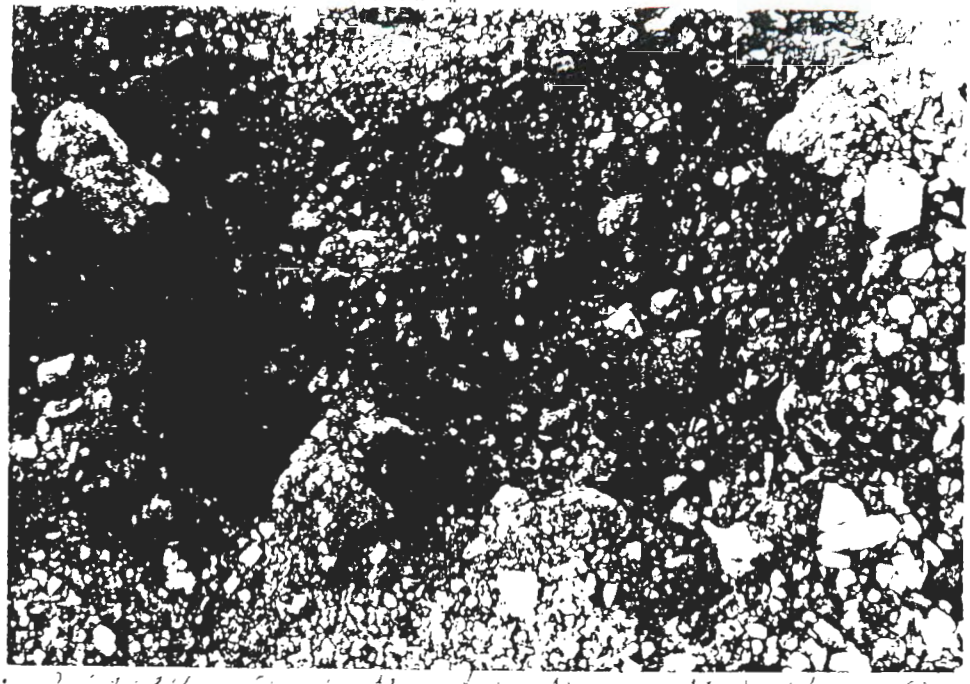
Comments:
[illegible] Main Shop Fueling area.
[illegible]
[illegible]

Photo # [illegible]



Comments: [illegible]

Photo # [illegible]

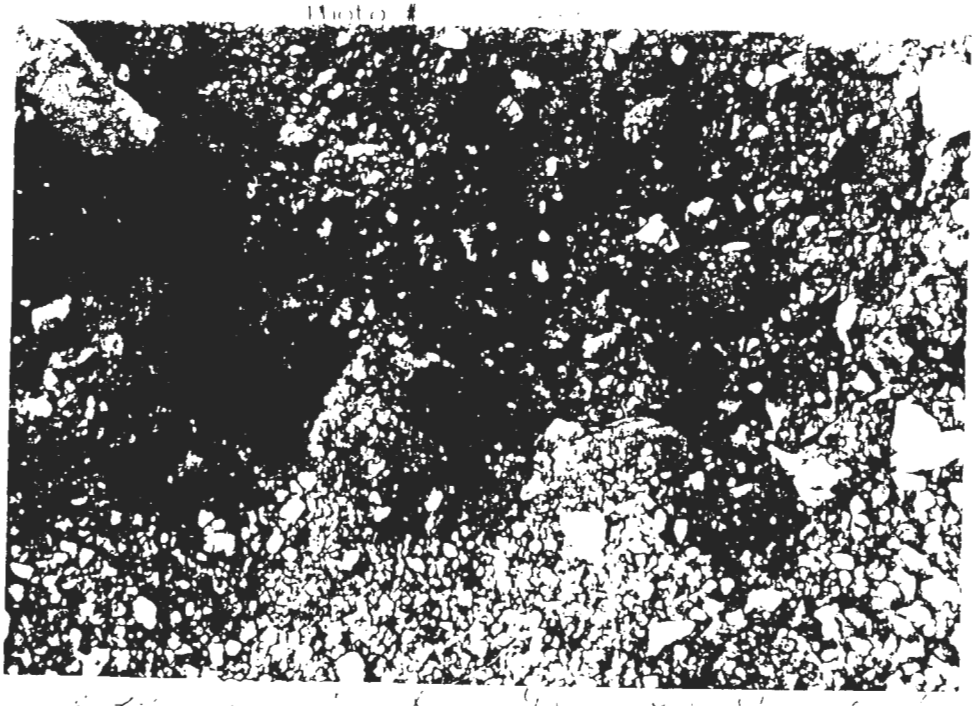


Comments: [illegible]

Photo #

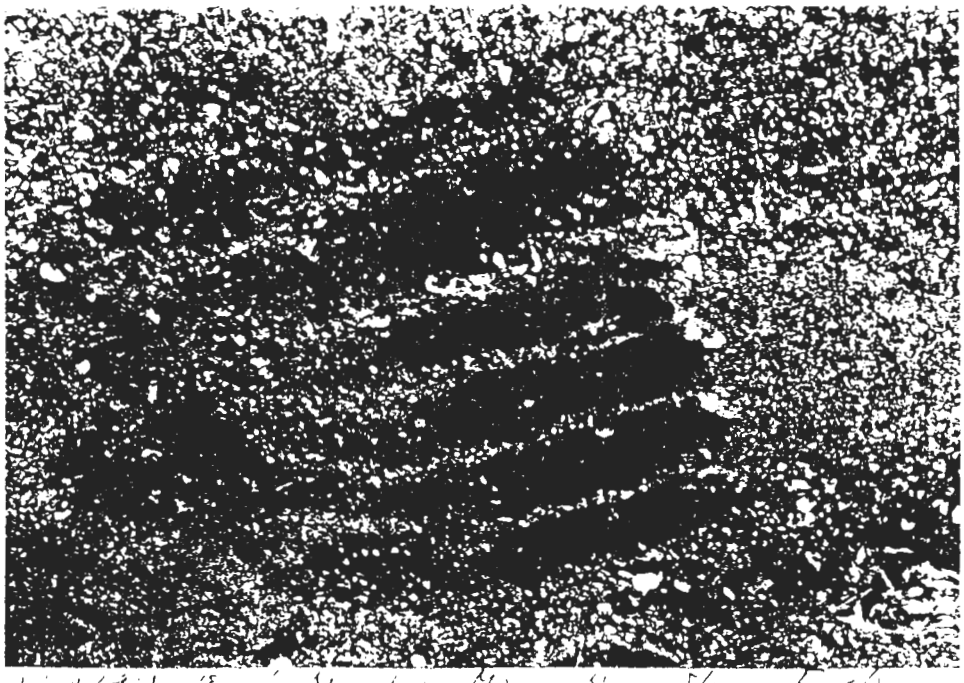
Comments: [illegible]

Photo #



Comments: [illegible]

Photo # [illegible]

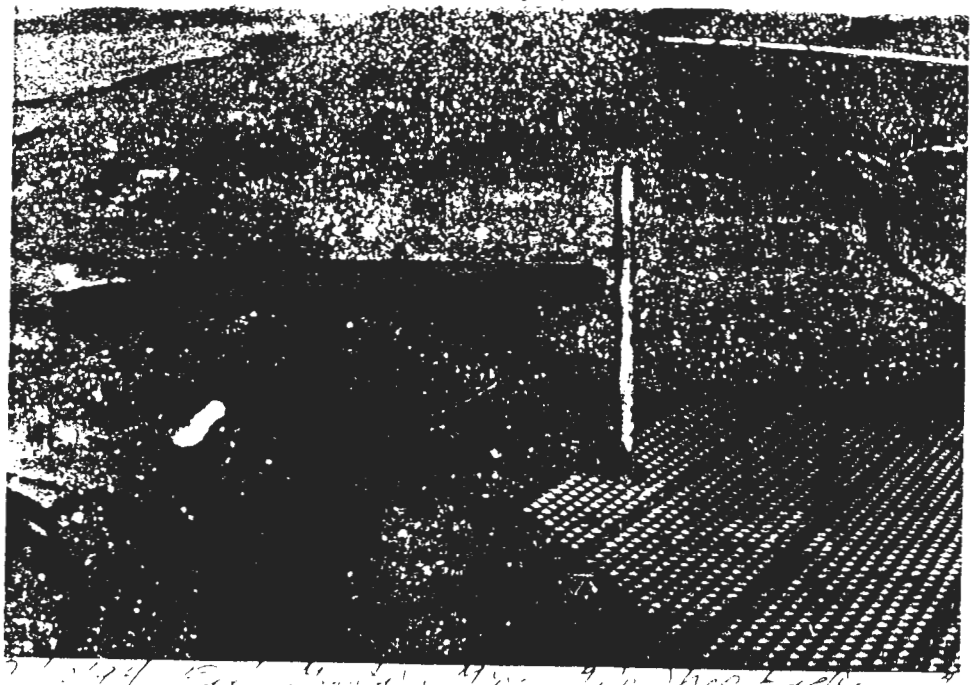


Comments: [illegible]

Photo # [illegible]

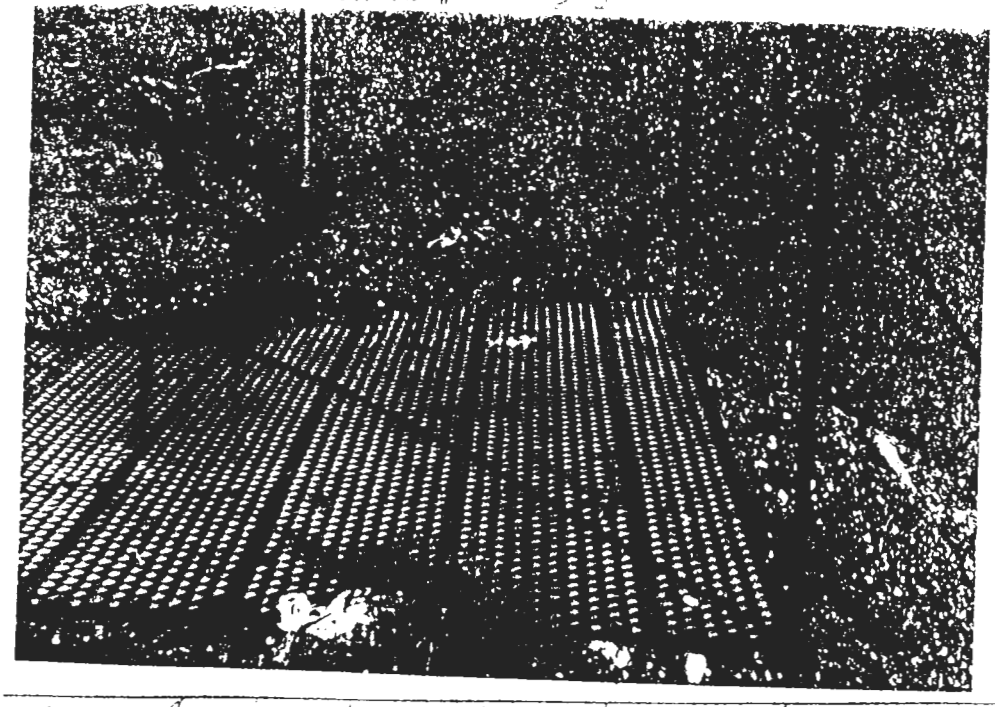
Comments: [illegible]

Photo #



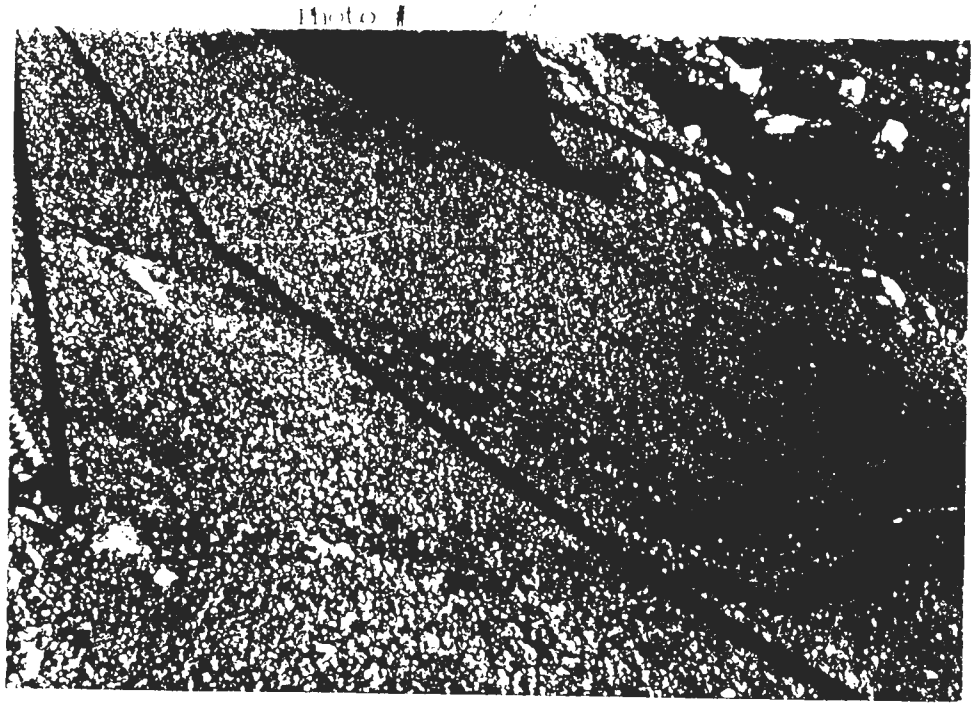
Comments: [illegible]

Photo #



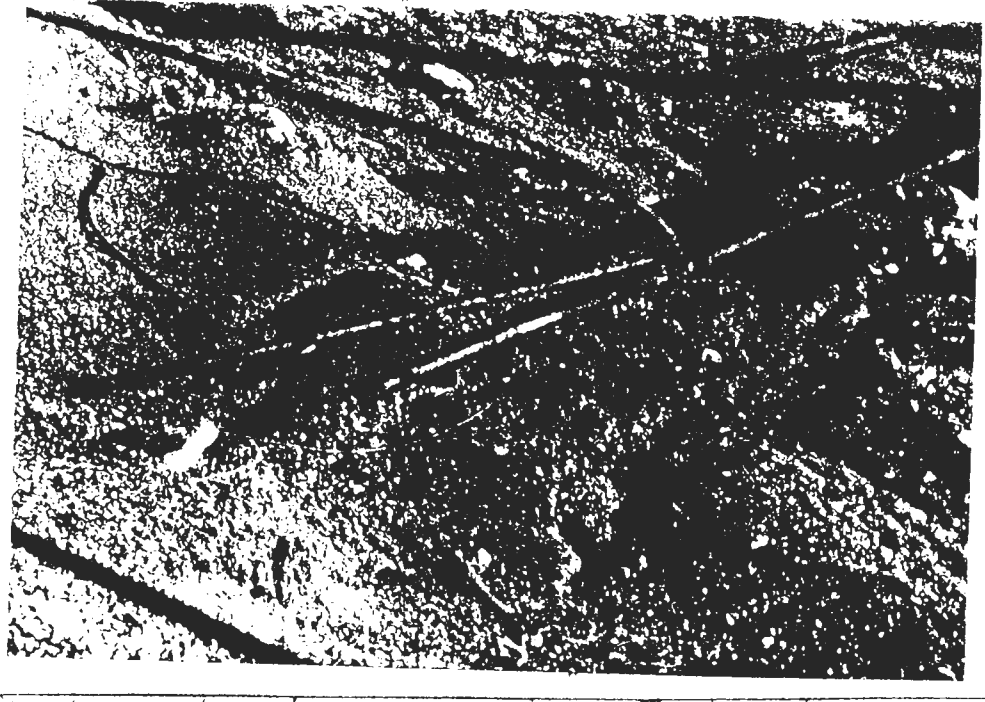
Comments: [illegible]

Photo #



Comments: [illegible]

Photo #



Comments: [illegible]

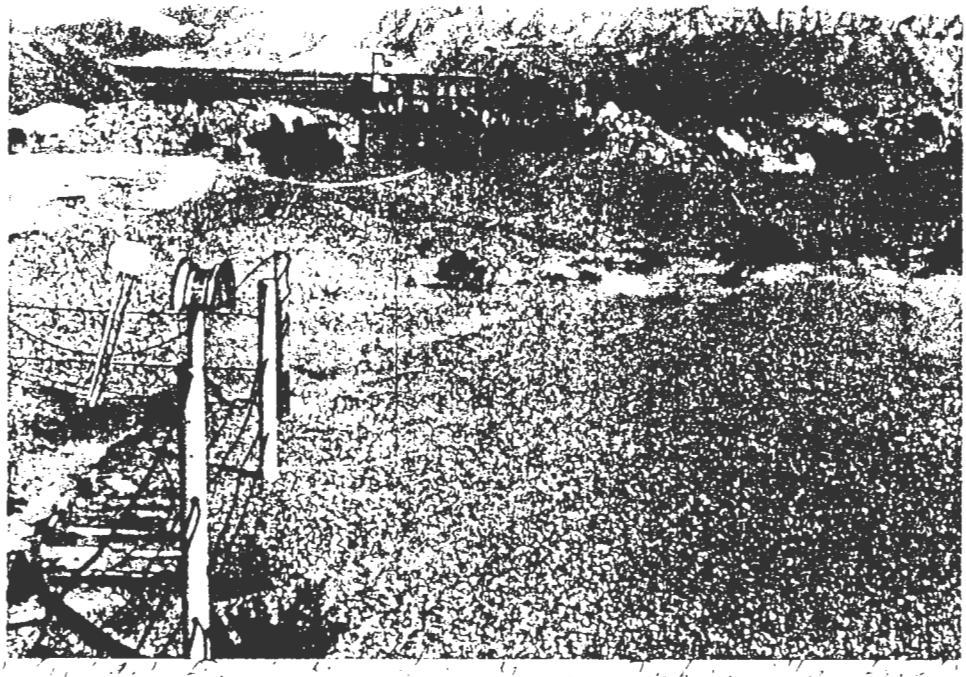
Photo #

Comments: [illegible] Eagle Mountain Mine
[illegible] Storage Area
[illegible] Mark Fuente [illegible]
[illegible] ERS 1A, 1B & 1C
[illegible]

Photo #

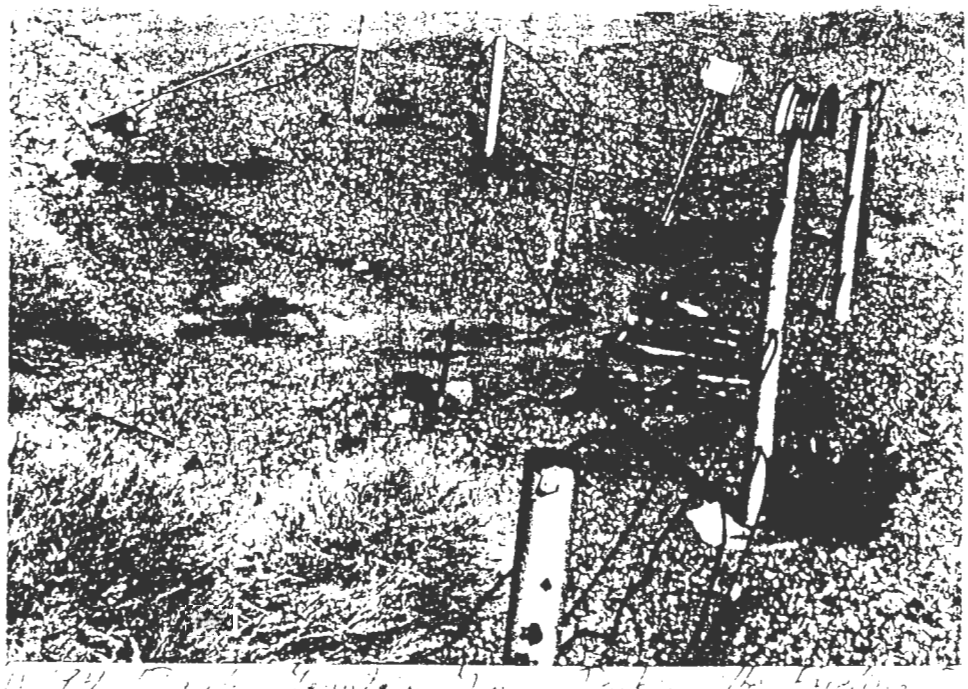
Comments: [illegible]
[illegible]
[illegible]
[illegible]
[illegible]

Photo 1



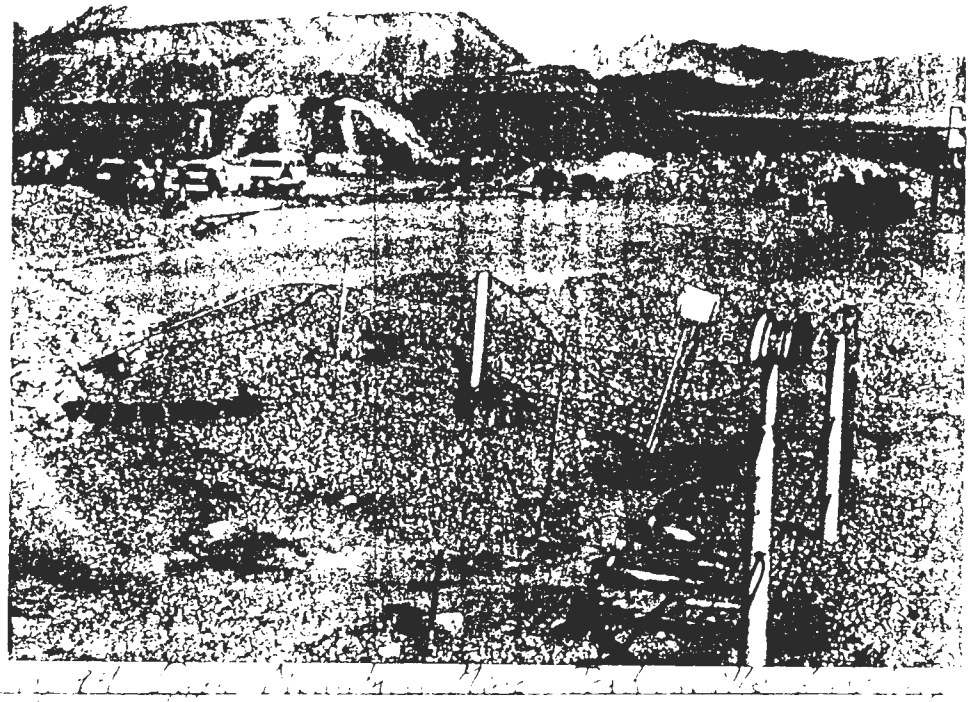
Comments: [illegible]

Photo 2



Comments: [illegible]

Photo #



Comments: [illegible]

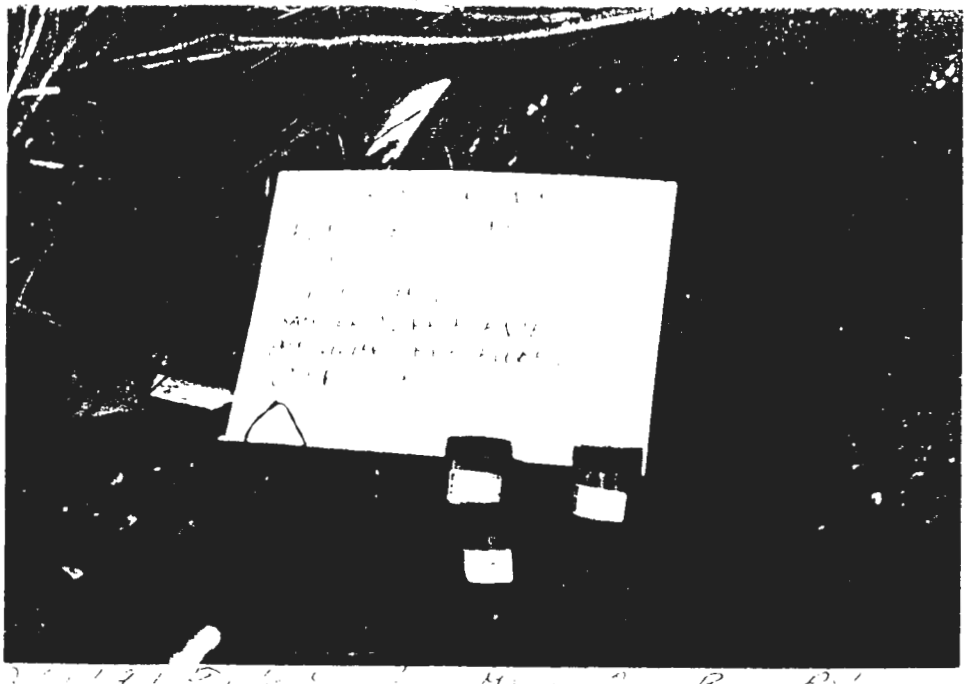
Photo #

Comments: [illegible]

Photo #

Comments: [illegible]

Photo #



Comments: [illegible]

Photo #

Comments:

Photo #

Comments:

ATTACHMENT 9

Hazardous Materials Laboratc
Operations Management Unit

'PPLEMENTAL
(check if Supplemental)

AUTHORIZATION REQUEST FORM (ARF)

PART A : (By Requestor – PLEASE PRINT)

PRIORITY LEVEL | 1

Requestor's Name Rick Hubbell
Region / Unit Reg 4 Sc
Phone Number (8) 635 [illegible]
FAX (8) 635 [illegible]
BACK-UP REQUESTOR Sharon Fair
Phone (8) 635-5715
SITE : Eagle Mountain

Analytical Requests Planned (circle analysis requested)

Analysis	# of Spls	Spl Type *	Analysis	# of Spls	Spl Type *
pH			Vol.Org. HdSpace		
Metal Scan	10	soil	8010	6	soil
Metal Spec.			8020		
W.E.T			8240/8260		
PAHs			T.C.L.P		
PCBs 8080	6	sludge/soil	Metals		
Cl-Pest			Volatiles		
OP-Pest			Semivol.		
Carbamates			Pesticides		
Ext.org. Screeng			Herbicides		
8270	10	soil			

Expected Date of Samples Arrival at Lab / /

Analysis Objective (circle one) a. Waste Characterization b. Treatment Standards c. Drinking H2O Standards d. Others :

Detection Limit Requirements :
(if diff than established DLs)

PART B : (By S T O – HML)

Authorization Number (AN) |__|__|__|__|__|__|__|__|__|__|

Expiration Date ____/____/____

Lab to Receive Samples Name
Address

Sample Tracking Officer (STO) : _____

Today's Date ____/____/____

* Spl Type : Water, Wastewater, Solvent, Oil, Liquid, Paint, Sludge, Soil, Solids ..etc

*Revised 3/93

California Environmental Protection Agency
Department of Toxic Substances Control
Hazardous Materials Laboratory (Inorganic Section)
151 Berkeley Way, Berkeley, CA 94704

Phone: (510) 540-3003 or (ATSS) 571-3003

HML #: 931188 to 931195

Collector's Name: **RICK HUBBEL**
Site of Sampling: **EAGLE MOUNTAIN MINE**
EAGLE MOUNTAIN MINE
DESERT CITY, 92239

Auth. No.: **HMJ2021**
Activity : **SEB**
Date Collected: **2/10**
Date Received: **3/9/94**

Analytical Procedure: EPA-SW 846

Samples are digested with 1:1 HNO3 (and 30% H202, and 1:1 HCl, if applicable) over a hot plate. Digests are cooled, filtered and made to final volume with deionized H2O. Metal analysis of the digests is by ICPAES (EPA #6010). Units are mg/kg.

Method: **3050 for solids; 3010 for liquids; 3005 for clean water.**

HML Number:	931188	931189	931190	931191	931192
Collector's Sample No.:	SH-1-A	EC-1-A	SH-2-A	SC-1-A	SC-2-A
Sample Type:	SOIL	SOIL	SOIL	SOIL	SOIL
As-Arsenic	12.3	<5.00	11.6	<5.00	12.4
Ba-Barium	23.8	112	26.1	38.3	68.5
Be-Beryllium	0.45	0.94	0.42	0.41	0.54
Cd-Cadmium	3.52	1.63	3.59	0.59	4.32
Co-Cobalt	144	36.9	77.3	27.9	112
Cr-Chromium	13.0	17.3	8.55	7.40	20.3
Cu-Copper	290	108	242	52.5	273
Mo-Molybdenum	<3.75	<3.75	<3.75	<3.75	<3.75
Ni-Nickel	15.9	17.5	11.4	9.95	18.9
Pb-Lead	76.1	23.4	54.2	11.4	68.1
Se-Selenium	<7.50	<7.50	<7.50	<7.50	<7.50
Tl-Thallium	<15.0	<15.0	<15.0	<15.0	<15.0
V-Vanadium	16.6	43.5	17.6	26.2	23.5
Zn-Zinc	177	129	264	67.7	487

Notes: < = below detection limit of method.

Merlyn de Guzman 3/25/94
ICP Analyst, Merlyn de Guzman — Date

Zenaida Odion 3/31/94
Chemist's Signature — Date
Zenaida Odion, Chemist

Milad S. Iskander 4/4/94
Milad S. Iskander, Supervisor — Date