2/20/91 PRC Settlement Conference

David Jones
Marcy

John Markley, PRC
Kathleen Tripple, PRC
Margaret Pietrasz, Atty
Garret Wong, Atty
Lydia (Guest from USSR)

David described settlement conf. routine. Explained penalty calculation.

PRC:
Counts I + II : Signal Hill
Count III : Fontana

Counts I + II :
Oil was tested at PRC <50 ppm.
Tested by Systec >300 ppm.
Oil back to PRC, again tested <50 ppm.* (done by outside lab)
CWM tested oil as part of incoming waste analysis
Oil tested at ~266 ppm.

PRC RESOURCES RECOVERY

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PRC RESOURCES RECOVERY

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* They provided us w/ copy of these results. Attachment 1.

PRC - has 8-9 new lab personnel
3 chemists, 4 technicians
GC purchased. Dedicated to PCB analysis.
New sample containers.
Prequalifications done at signal hill;
other labs do fingerprinting. (AA + GC equip)

new equipment since 2/17/90

Requested exact names of equipment and model #'s being used at all locations.

Asked about discrepancy in 6800 gal.
They do not know where 6800 − 2500 = 4300 gallons originated. (David thinks they are protecting a client).

Asked how they track volumes:
Some loads come w/ weight ticket (calculate gal. from wt.)
Small generators w/ bobtail - hand gauged.
get gallonage on every truck coming in.

Ex of procedure when oil comes in:
Profile sheet - prepared by generator
No cert. or test, then they test.
Run halide test. They assume that if no halides = no PCBs. Don't run PCB test on every load. Run halide test on every load. Use chlor-detect to test for halides. If halides appear, then they do a GC test.

Load delivered. - Check ("fingerprint") to see if waste oil is w/in matrix. Load guaged or ticketed to get gallons. Accepted. Analyzed before pumped out again. They have day tanks for each type of waste stream (3) for each day. Day tanks are tested.

Recycled oil - used as bunker fuel or sent out onto fuel oils market.

Count III : SPCC Plan. Prepared in 9/89. 9/89 plan was in effect, but had not been reviewed and signed by an engineer. Declarations that SPCC plan was prepared & implemented - Signed statements from William Gonches & Al Metz (Attachments 2 + 3)

They didn't have batch records.

David - explained CAFO
Marcy - explained poss. reductions in penalty.