Hazardous Waste Treatment, Storage, and Recycling Facility

Closure Certification Report

For The

Romic Environmental Technologies Corp.
Romic Southwest Facility

Date: **August 18, 2009**

Prepared For: **U. S. Environmental Protection Agency**
Region IX

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EXECUTIVE SUMMARY

The Romic Environmental Technologies Corp. facility known as the Romic Southwest Facility was closed in accordance with the Closure Plan submitted to and approved by the U.S. Environmental Protection Agency.

Metro Environmental Services, Inc. is the independent registered professional engineer contracted to certify the closure of the Romic Southwest Facility. This report is the documentation of closure activities at the site. With the exception of the amendments noted within this report, the Closure Plan was followed in its entirety.

All units at this facility were closed in accordance with the Closure Plan. All hazardous wastes were removed from the RCRA regulated units and disposed of at a permitted disposal facility. No further regulatory control under RCRA Subtitle C is necessary to protect human health and the environment.

1.0 INTRODUCTION AND BACKGROUND

1.1 INTRODUCTION

This Closure Report documents the procedures that Romic Environmental Technologies Corp. followed to close the hazardous waste management units (HWMUs) and solid waste management unit (SWMU) at the former Romic Southwest facility in the Lone Butte Industrial Park near Chandler, Arizona.

The closure project was completed in accordance with the Closure Plan, revised August 15, 2008, approved by U.S. EPA on August, 18, 2008, (included as Appendix I to this Report) as amended (see Section 3.0). The goal of the Closure Plan was to achieve clean closure. This means that all hazardous wastes were removed from the RCRA regulated units, and that any releases at or from the units were remediated so that further regulatory control under RCRA Subtitle C is not necessary to protect human health and the environment.

The Closure Report includes background information on the facility, information concerning the closure team and schedule, a discussion of any modifications to the Closure Plan, a description of closure activities, certification of closure, and a conclusion. Documentation of closure activities is included in the appendices to this report.

1.2 BACKGROUND

1.2.1 Facility Identification

The subject of this report is the former Romic Southwest Facility, located at 6760 West Allison Road in Chandler, Arizona. The facility EPA Identification Number is AZD 009015389.

1.2.2 General Facility Description

Romic Southwest was an off-site hazardous waste management facility. The facility was primarily engaged in resource recovery. Industrial wastes were shipped to the facility for recycling and treatment from various industries, including dry cleaning, printing, electronics manufacturing, aerospace manufacturing, paint manufacturing, and automotive parts manufacturing. In addition, the facility received household hazardous waste (e.g., motor oil, paints, cleaners, etc.) from household waste collection events.

Specific types of waste streams managed at the facility included industrial and household wastes, halogenated and non-halogenated solvents, Freon and Freon substitutes, waste oils, sludges, oxidizers, corrosives, resins/adhesives, debris/solids, wastewater, resin bed media, paints, aerosols, batteries, fluorescent tubes, and lab packs. The facility did not accept the following types of hazardous waste for treatment or processing:

- Radioactive Waste
- Explosives
- Waste containing polychlorinated biphenyls (PCBs) at levels of 50 parts per million and above.
- Etiological Waste

- Pathogenic Waste

The facility received, stored, and processed wastes in either bulk loads (e.g., tanker trucks, roll off bins, etc.) or containers (e.g., 55-gallon drums, totes, etc.). The waste was transported to the facility by licensed hazardous waste transporters. All containers manifested to the facility were inspected and assigned a unique tracking number, which was marked on the container using a bar code label. The containers were then stored in designated storage areas prior to transfer to the assigned processing area. The storage areas were equipped with concrete secondary containment and a roof, and were operated so that incompatible wastes (e.g., strong acids and strong bases) were segregated.

The facility utilized solids consolidation, solvent recycling, ethylene glycol recycling, fuel blending, and "off-site" transfer as forms of hazardous waste management.

The facility also consolidated small containers, crushed cans and drums, depressurized aerosol containers. No wastes were disposed of on-site by any means; all wastes were transferred off-site for ultimate disposal or reuse. Romic was permitted under the federal National Pollutant Discharge Elimination System (NPDES) Storm Water Multi-Sector General Permit for storm water discharges under the terms and conditions imposed by this general permit.

1.2.3 Facility Location

The facility is located in Maricopa County on the Gila River Indian Reservation in the Lone Butte Industrial Park. The adjacent landowner is:

Gila River Indian Community
P.O. Box 398
Sacaton, AZ, 85247

The Industrial Park is zoned heavy industrial. The facility was surrounded by manufacturing and distribution plants to the west, south and east, and a highway (the San Tan Freeway, Loop 202) to the north.

1.2.4 Flood Plain

The facility is located in an area designated as "ZONE D" which is defined as an undetermined flood hazard.

1.2.5 Drainage

Storm water that falls on paved areas of the facility drains toward blind sumps located at various points within the containment areas. The storm water was collected from these sumps, pumped into rain water storage tanks, and tested prior to discharge. If rainwater analysis indicated contamination, the rainwater was transported off-site for disposal. Drainage from the roofs was routed to the driveway for drainage out of the facility onto Allison Road.

Cooling tower and boiler blow down water was discharged under permit No. 24 to the City of Chandler Treatment Facility via Lone Butte sewers. Romic Southwest did not discharge process waste water.

1.2.6 Rain Data

Average rainfall data was obtained from the Weather Bureau. The 25 year, 24-hour storm event was determined to be approximately 3.12 inches.

1.2.7 Wind Rose

The prevailing wind direction in the vicinity of the facility is primarily in the east, northeast, and southeast directions. The data was obtained from the meteorological station at Sky Harbor Airport.

1.2.8 Geology

The former Romic Southwest facility is located in the East Salt River Valley (SRV), which is part of the geologic Basin and range physiographic province. (The cadastral location of the facility is in Section 4, Township 2 South, Range 4 East). The East SRV is a basin filled with alluvial sediments several thousand feet thick. The facility is located within the part of the East SRV that is bounded on the north by the Salt River, to the west by South Mountain, to the south by the Santan Mountains, and to the east by the Superstition Mountains.

The facility is located approximately 75-100 feet above a minor aquifer, and 900-1000 feet above a usable aquifer that is the source of water for the Lone Butte Industrial Park. The site is capped by up to 100 feet of recent alluvial fill material. A clayey sand layer up to 1,000 feet thick underlies the surficial fill. Intermixed with this clayey sand are other constituents such as gravel, shale, and sandstone.

1.2.9 Hydrogeology

As discussed above, there are generally two regional aquifers in the immediate area. Information contained in well logs 1 and 2 as recorded by Bert E. Perry, Well Drilling Contractors, indicates there is an aquifer located at a minimum of 900 feet below ground level. This aquifer is the source of water to the Lone Butte Industrial Park. In May 2004, Lone Butte monitoring well LB-4 was installed on Nelson Road, approximately 500 feet southwest of the facility. The Gila River Indian Community Department of Environmental Quality (GRIC DEQ) indicated that depth to groundwater in this well is approximately 74 feet.

1.2.10 Prior Site Activities

The facility land is owned by the Gila River Indian Community and has been leased by several operators. The facility was originally operated as Southwest Solvents, and subsequently as Southwest Solvent Industrial Recycling (Southwest Industrial), which began operations on the site in 1975. Romic purchased the facility in August, 1988. Romic was purchased by U.S. Liquids on January 15, 1999, and subsequently by ERP Environmental, Inc., on August 1, 2003.

The following chronology recaps remediation activities performed on the facility site upon purchase of the facility by Romic.

February 1989 Harding Lawson Associates conducted sampling of Phase I, II, and III areas. Sampling consisted of collecting 38 surface soil samples and subsurface soil samples from 20 borings. The sample intervals included 1-1.5’, 5-5.5’, and 10-10.5’. The samples were analyzed for PCBs, Cyanide, Phenols, Pesticides, Total Petroleum Hydrocarbons (TPH), Sulfides, EP Tox Metals, and Volatile Organic Hydrocarbons (VOCs) (subsurface samples only). Analytical results showed that the only contaminant exceeding the EPA recommended action level was TPH. The TPH contaminated soil was limited in depth from the surface to approximately one foot. Isolated areas of soil contamination were detected to depths of three feet.

September 1989 Received EPA approval that Phase I area was adequately remediated.

September 1989 Emcon Associates conducted sampling of Phase II area. Sampling consisted of collecting 29 surface samples, subsurface soil samples, and subsurface soils samples from 28 borings. The sample intervals included 1-1.5’, 5-5.5’, and 10-10.5’. The samples were analyzed for PCBs, Pesticides, TPH, Total Metals, Cyanide, Phenols, Sulfides, and VOCs (subsurface samples only) Analytical results showed that the only contaminant that exceeded the EPA recommended action level was TPH. The TPH contaminated soil was limited in depth from the surface to approximately one foot. Isolated areas of soil contamination were detected to depths of three feet.

October 1989 Remediation of Phase II was completed.

November 1989 Construction of Drum Storage building was completed. The foot print of the building was lined with a high-density polyethylene liner and the concrete was coated with a chemical resistant sealant.

July 1990 Emcon Associates conducted sampling of the Phase III area, Sampling consisted of collecting soil samples from 23 soil borings at sample intervals of 0-3”, 1-1.5’, 4-5.5’, and 9.5-10’. The samples were analyzed for PCBs, Pesticides, TPH, Phenols, Sulfides, Total Metals, and VOCs (subsurface samples only). Analytical results showed that the only contaminant that exceeded the EPA recommended action level was TPH. The TPH contaminated soil was limited in depth from the surface to approximately one foot. Isolated areas of soil contamination were detected to depths of three feet.

January – March 1991 Remediation of abandoned drum pads, truck loading dock and one tank farm. New tank farm built, foot print lined with a high-density polyethylene liner.

May – June 1991 Additional Phase II sampling requested by EPA. Sampling included addition of nine new sampling locations with as many as three depth intervals (.5-1’, 4.5’-5’, and 9.5’-10’). Samples were analyzed for a variety of constituents, to include: PCBs, Pesticides, TPH, Total Phenols, Total Sulfides, TCLP Metals, Total Metals, Polynuclear Aromatics, and Volatile Organics. Analytical results showed that the only contaminant that exceeded the EPA recommended action level was TPH. The TPH contaminated soil was limited in depth from

surface to approximately one foot. Isolated areas of soil contamination were detected to depths of three feet. Pesticides were detected in one surface sample above EPA action limits.

June 1991 Site was subdivided into smaller areas to expedite remediation efforts. Phase II and III were subdivided into seven remediation areas.

August – September 1991 Remediation of Subarea 1 completed. Railroad tracks were extended around north of drum storage building. Concrete rail loading containment area constructed.

September – October 1991 Remediation of Subarea 2 completed. Concrete drive was installed on the east side of the facility equipped with an automatic gate. Concrete access to the rail loading facility and drum storage area was completed.

November – December 1991 Remediation of Subareas 3 and 4 was completed. Concrete drive was installed along the west side of the facility equipped with an automatic gate. Installation of a new tank farm located in the central portion of the facility, foot print lined with a high-density polyethylene liner.

January 1992 Remediation of Subarea 6 was 75% completed. Installation of a new tank farm located in the northwest portion of the facility, foot print lined with a high-density polyethylene liner.

March 1992 Remediation of Subarea 5 was completed. New waste handling area was installed in the central portion of the site. This area and the tank farm completed in December 1991 had a roof structure built over it.

April – June **1992 Completed remediation of Subareas 6 and 7. Installation of a new tank farm located** in the western portion of the facility, foot print lined with a high-density polyethylene liner. This area contains the thin film processing equipment.

August 1992 Remediation completed. Construction of the new building in the southeast portion of the facility started. Building contains a tank farm on the north side and both building and tank farm footprints are lined with a high-density polyethylene liner. It will become the acid/base storage building and process area.

December 1992 Construction of planned acid/base storage building (Storage Building #2) complete. GRIC DEQ has identified ground water contamination in the Lone Butte Industrial Park in recent years. Romic is working with U.S. EPA and GRIC DEQ to further investigate and implement corrective actions to address regional ground water contamination.

1.2.11 Facility Design

The HWMUs at the facility consisted of a container storage building on the north portion, tank storage units in the center and on the east side, distillation processing units in the center east portion. A rail spur entered the facility on the west side; rail cars were loaded in a secondary containment structure in the western portion of the facility. The facility laboratory was housed in a building in the southeastern corner of the site. Facility administrative, supervisory, and

management personnel, as well as field services personnel, were located in trailers in the south portion of the facility. These trailers also included the plant lunchroom and locker/shower facilities. Most of the remainder of the site is paved, with approximately 5% gravel. Figure 1 illustrates the facility as it existed prior to closure.

2.0 CLOSURE PLAN IMPLEMENTATION

2.1 Closure Team

A closure team consisting of experienced firms was assembled by Romic to perform the closure of this facility. Romic retained responsibility for the overall management of the closure project. Primary members of the closure team were as follows:

Contractor	Level[1]	Role
Boart Longyear	Subcontractor	Driller
Clean Harbors Environmental Services, Inc.	Prime contractor	Aboveground closure (equipment and containment decontamination and dismantling) contractor
Environmental Science Corporation	Subcontractor	Analytical laboratory, used for subsurface samples
Iris Environmental	Prime contractor	Oversight and direction of LFR, Inc.; coordination with activities under RCRA Corrective Action
LFR, Inc.	Prime contractor	Subsurface investigation
Metro Environmental Services, Inc.	Prime contractor	Independent Registered Professional Engineer Certifying Closure
Strongarm Environmental Field Services, Inc.	Subcontractor	Driller
TestAmerica	Subcontractor	Analytical laboratory, used for aboveground closure samples

[1] Contractor levels: Prime contractors were those contracted directly to Romic. Subcontractors were involved in the project through a contractual relationship with a prime contractor or another subcontractor.

2.2 Closure Schedule

Closure activities commenced on January 13, 2009 and were completed on June 26, 2009.

3.0 CLOSURE PLAN AMENDMENTS

The version of the Closure Plan dated August 15, 2008, was followed as written with the exception of the following amendments, which were approved in advance by the USEPA:

#	Title	Amendment Description	Requested	Approved
1	Groundwater Sample Location	This amendment requested that the groundwater sample to be collected from the soil boring in the former Canopy Area be collected instead from a new boring immediately down gradient from the Canopy Area	10/03/2008	1/12/2009
2	Request for Time Extension	This amendment requested that the completion date of closure activities be extended be extended from 2/16/09 to 8/14/09 for the following reasons: • Work activities planned to avoid interference between crews; • Work activities planned to avoid potential of cross contamination and interference between aboveground decontamination work and subsurface drilling/ sampling; • Subsurface conditions present difficulties for drilling.	12/29/2008	1/12/2009
3	Revisions to Decontamination SOPs and Checklists	This amendment requested that high pressure hydroblasting be added as a decontamination option for the aboveground portion of the facility.	2/20/2009	2/20/2009
4	Presence of Decontamination Water Below Slab	Water from the equipment decontamination penetrated the concrete slab in Tank Farm B through existing cracks in the concrete and saturated a 2 inch sand layer on top of the plastic liner. This modification requested that Bentonite be used to seal the sand layer and drilling continue beneath the liner to collect additional samples.	4/2/2009	4/2/2009

Documentation of these Amendments is included as Appendix II.

4.0 MITIGATION OF IMPACTS

Section 3.0 of the Closure Plan discussed potential impacts arising from performance of the closure project, and proposed mitigating measures to be taken. This section summarizes the planning and actual implementation pursuant to this section.

4.1 Community Impacts

Romic and its contractors took measures to minimize impacts on the surrounding community.

Closure contractors were informed of preferred access routes for heavy trucks. No complaints were received, nor was any evidence observed that contractor heavy trucks failed to follow preferred routing.

Romic's onsite representative, Mr. Ashok Jain, maintained close contact with Lone Butte Industrial Park officials to keep them apprised of planned activities, particularly those with the potential to cause noticeably heavy traffic, traffic disturbances, or noise.

No complaints were noted, either from the surrounding community, fellow tenants of the Lone Butte Industrial Park, or Industrial Park or Tribal officials.

4.2 Environmental Impacts

The Closure Plan for the Romic Southwest facility was unconventional in that it required the closure contractors to develop "Waste Reduction and Energy Savings Implementation Plans", or "Green Measures Plans" to reduce negative environmental impacts. These plans were subject to U.S. EPA approval.

The Green Measures Plans that the contractors developed guided contractor operations during the completion of their respective portions of the Closure project. The Green Measures Plans are incorporated in this report in Appendix III.

The Green Measures were highly successful. Some Green highlights:

- Decontamination rinsewater was filtered and reused, greatly reducing the amount of potable water consumed. Closure activities consumed only about a third of the amount of water consumed on a comparable project performed by Clean Harbors, saving over 18,000 gallons.
- Over 65 tons of steel from this project, or about 99% of the total was reused or recycled. Most of the steel equipment at the facility was decontaminated sufficiently to allow reuse of the equipment for its original intended service.
- 75% of greenhouse gas emissions avoided compared to a comparable conventional project, a reduction in emissions of CO_2 of more than 6.5 tons.

The contractors documented their performance under the Green Measures Plans, as specified therein. Their documentation is also included in Appendix III.

5.0 CLOSURE ACTIVITIES

Clean Harbors Environmental Services, Inc. ("Clean Harbors") performed the physical dismantling of tanks, piping, and equipment; decontamination of all tanks, piping, and equipment; and decontamination of all concrete secondary containment structures and sump.

Following decontamination, the Clean Harbors Project Superintendent visually inspected all cleaned tanks, equipment and concrete secondary containment structures and sumps in accordance with the Standard Operating Procedures (SOPs) for verification included as Attachment D to the Closure Plan and made the determination that the subject had either passed or failed to meet the criteria required in order to meet the clean debris standard, referenced in 40 CFR 268.45 Table 1. The Clean Harbors Project Manager was responsible for ensuring field verification procedures were sound and of sufficient quality for decisionmaking, and signified the same by reviewing and signing field verification checklists.

The operational checklists completed by Clean Harbors personnel documenting performance closure activities were scanned and are included in this report as Appendix IV.

Metro Environmental Services, Inc. reviewed field activities and documentation, witnessed decontamination activities, and examined equipment following decontamination and found no evidence to contradict the determinations made by Clean Harbors Environmental Services, Inc.

Iris Environmental provided oversight and direction for the subsurface investigation portion of the closure project, ensuring that the investigation was conducted in accordance with the Closure Plan and with generally accepted practices. Iris also ensured coordination between closure subsurface activities and activities being conducted under RCRA Corrective Action at the facility.

Subsurface conditions were investigated by LFR, Inc. (LFR). A report detailing LFR's activities, findings, and conclusions is included as Appendix VIII to this report. The subsurface investigation was conducted in accordance with the Closure Plan.

Table 1 of this Closure Report lists the units that were closed, including an inventory of the major equipment that comprised each unit. A unit-by-unit description of closure activities performed follows below.

5.1 Tank Farm A & B

Closure activities in Tank Farm A and Tank Farm B began the week of January 19, 2009 and were completed on March 6, 2009. Closure activities followed the original Closure Plan, except as authorized under Closure Plan Amendment #1 (see Section 3.0 above).

Prior to pressure washing, two drums of solid waste material were removed from the tanks in this area. The hazardous waste disposal manifest for transportation and disposal of this waste (manifest tracking number 005535441 JJK) is included in Appendix VII.

The six hazardous waste storage tanks in this unit (see Table 1) were pressure washed, rinsed twice and allowed to air dry. Visual examination conducted after drying revealed that the tanks

had rusted during the drying process. As a result, verification that a clean debris surface had been achieved was not possible. The tanks were hydroblasted in accordance with Amendment #3 (see Section 3.0), and subsequently visually inspected by Clean Harbors in accordance with the approved SOPs in the Closure Plan.

All pumps and piping from this area were removed and examined. Piping that contained solidified material was separated and disposed of as RCRA hazardous waste at the US Ecology facility in Beatty, Nevada, EPA ID Number NVT330010000 ("US Ecology"). Pumps and the balance of the piping were pressure washed and rinsed with water. A sample of the final rinsate was collected and analyzed to verify successful decontamination.

The concrete secondary containment and sumps in this area were pressure washed and rinsed with water. They were then visually inspected by Clean Harbors in accordance with the approved SOPs in the Closure Plan.

One deep and four shallow borings were drilled and sampled by LFR in Tank Farm A and Tank Farm B at locations previously identified in the SAP. A total of 35 soil samples and one groundwater sample were collected from the borings in accordance with procedures presented in the SAP. In addition, LFR collected a sample of a fluid encountered beneath the concrete slab and above the HDPE (high density polyethylene) vapor barrier under Tank Farm B. A detailed description of the subsurface investigation activities is presented in Appendix VIII.

As noted in Amendment #4 (see Section 3.0 and Appendix II), an approximately 6-inch thick bentonite seal was placed in the core hole prior to punching through the liner to prevent the migration of fluids down the borehole. Inspection of the borehole following completion of the sampling confirmed that no fluids migrated past the bentonite seals.

All field and laboratory data Quality Assurance and Quality Control ("QA/QC") requirements as specified in the SAP were met. All soil and groundwater samples are valid and do not require qualification.

5.2 Tank Farm C

Closure activities in Tank Farm C began the week of January 19, 2009 and were completed on February March 6, 2009. Closure activities followed the original Closure Plan.

The five hazardous waste storage tanks in this unit (see Table 1) were pressure washed, rinsed twice and allowed to air dry. They were then visually inspected by Clean Harbors in accordance with the approved SOPs in the Closure Plan.

All pumps and piping from this area were removed and examined. Pumps and piping from this area were pressure washed and rinsed with water. A sample of the final rinsate was collected and analyzed to verify successful decontamination.

Concrete secondary containment and sumps in this area were pressure washed and rinsed with water. They were then visually inspected by Clean Harbors in accordance with the approved SOPs in the Closure Plan.

One deep and one shallow boring were drilled and sampled by LFR in Tank Farm C at locations previously identified in the SAP. A total of eighteen soil samples and one groundwater sample were collected from the borings in accordance with procedures presented in the SAP. A detailed description of the subsurface investigation activities is presented in Appendix VIII. All field and laboratory data Quality Assurance and Quality Control ("QA/QC") requirements as specified in the SAP were met. All soil and groundwater samples are valid and do not require qualification.

5.3 Tank Farm D

Closure activities in Tank Farm D began the week of January 19, 2009 and were completed on March 6, 2009. Closure activities followed the original closure plan.

The two hazardous waste storage tanks in this unit (see Table 1) were pressure washed, rinsed twice and allowed to air dry. They were then visually inspected by Clean Harbors in accordance with the approved SOPs in the Closure Plan.

All pumps and piping from this area were removed and examined. Pumps and piping from this area were pressure washed and rinsed with water. A sample of the final rinsate was collected and analyzed to verify successful decontamination.

Concrete secondary containment and sumps in this area were pressure washed and rinsed with water. They were then visually inspected by Clean Harbors in accordance with the approved SOPs in the Closure Plan.

Tank 135, listed in Table 1, was formerly in Tank Farm D. It was closed before the current closure project started; as noted in a footnote to Table 1, certification of this former unit was previously submitted to U.S. EPA by Romic.

One deep and three shallow borings were drilled and sampled by LFR in Tank Farm D at locations previously identified in the SAP. A total of 28 soil samples and one groundwater sample were collected from the borings in accordance with procedures presented in the SAP. A detailed description of the subsurface investigation activities is presented in Appendix VIII. All field and laboratory data Quality Assurance and Quality Control ("QA/QC") requirements as specified in the SAP were met. All soil and groundwater samples are valid and do not require qualification.

5.4 Vacuum Pot / Thin Film Evaporator Area

Closure activities in the Vacuum Pot / Thin Film Evaporator Area began the week of February 23, 2009 and were completed on March 13, 2009. Closure activities followed the original closure plan.

The vacuum pot system in this area had previously been cleaned and removed in November, 2007. Cleaning consisted of processing several batches of a mixture of n-methyl pyrrolidone and diethylene glycol (to clean the unit), then processing water to wash the unit. Once the unit was verified clean by the onsite Operations Manager, it was dismantled and shipped to the Clean

Harbors facility in El Dorado, Arkansas (Clean Harbors El Dorado, LLC, El Dorado, AR, EPA ID Number ARD069748192) for industrial reuse.

The balance of the hazardous waste storage tanks and equipment in this unit (including the equipment comprising the thin film evaporator system) were pressure washed, rinsed twice and allowed to air dry. They were then visually inspected by Clean Harbors in accordance with the approved SOPs in the Closure Plan.

All pumps and piping from this area were removed and examined. Piping that contained solidified material was separated and disposed of as RCRA hazardous waste at US Ecology. Pumps and the balance of the piping were pressure washed and rinsed with water. A sample of the final rinsate was collected and analyzed to verify successful decontamination.

Concrete secondary containment and sumps in this area were pressure washed and rinsed with water. They were then visually inspected by Clean Harbors in accordance with the approved SOPs in the Closure Plan.

One deep and two shallow borings were drilled and sampled by LFR in the Vacuum Pot / Thin Film Evaporator Area at locations previously identified in the SAP. A total of 22 soil samples and one groundwater sample were collected from the borings in accordance with procedures presented in the SAP. A detailed description of the subsurface investigation activities is presented in Appendix VIII. All field and laboratory data Quality Assurance and Quality Control ("QA/QC") requirements as specified in the SAP were met. All soil and groundwater samples are valid and do not require qualification.

5.5 Distillation Column Area

Closure activities in the Distillation Column Area began the week of February 9, 2009 and were completed on March 6, 2009. Closure activities followed the original closure plan.

The process equipment in this unit (see Table 1) was pressure washed, rinsed twice and allowed to air dry. A visual inspection was conducted after drying by Clean Harbors in accordance with the approved SOPs in the Closure Plan.

All pumps and piping from this area were removed and examined. Pumps and piping from this area were pressure washed and rinsed with water. A sample of the final rinsate was collected and analyzed to verify successful decontamination.

Concrete secondary containment and sumps in this area were pressure washed and rinsed with water. They were then visually inspected by Clean Harbors in accordance with the approved SOPs in the Closure Plan.

One deep and one shallow borings were drilled and sampled by LFR in the Distillation Column Area at locations previously identified in the SAP. A total of 18 soil samples and one groundwater sample were collected from the borings in accordance with procedures presented in the SAP. A detailed description of the subsurface investigation activities is presented in Appendix VIII. All field and laboratory data Quality Assurance and Quality Control ("QA/QC")

requirements as specified in the SAP were met. All soil and groundwater samples are valid and do not require qualification.

5.6 VOC System Area

Closure activities in the VOC System Area began the week of February 23, 2009 and were completed on March 10, 2009. Closure activities followed the original closure plan.

The process equipment in this unit was pressure washed, rinsed twice and allowed to air dry. A visual inspection was conducted after drying by Clean Harbors in accordance with the approved SOPs in the Closure Plan.

All pumps and piping from this area were removed and examined. Pumps and piping from this area were pressure washed and rinsed with water. A sample of the final rinsate was collected and analyzed to verify successful decontamination.

Concrete secondary containment and sumps in this area were pressure washed and rinsed with water. They were then visually inspected by Clean Harbors in accordance with the approved SOPs in the Closure Plan.

One deep and one shallow borings were drilled and sampled by LFR in the Distillation Column Room adjacent to the VOC System Area at locations previously identified in the SAP. Due to the close proximity of the two areas, one set of borings was used for sampling both locations. A total of eighteen soil samples and one groundwater sample were collected from the borings in accordance with procedures presented in the SAP. A detailed description of the subsurface investigation activities is presented in Appendix VIII. All field and laboratory data Quality Assurance and Quality Control ("QA/QC") requirements as specified in the SAP were met. All soil and groundwater samples are valid and do not require qualification.

5.7 Drum Storage Building #1

Closure activities in the Drum Storage Building #1 began the week of February 23, 2009 and were completed on February 27, 2009. Closure activities followed the original closure plan.

Concrete secondary containment and sumps in this area were pressure washed and rinsed with water. They were then visually inspected by Clean Harbors in accordance with the approved SOPs in the Closure Plan.

Two deep and nine shallow borings were drilled and sampled by LFR in the Drum Storage Building #1 and adjacent Canopy Area at locations previously identified in the SAP. A total of 74 soil samples and one groundwater sample were collected from the borings in accordance with procedures presented in the SAP. A detailed description of the subsurface investigation activities is presented in Appendix VIII. All field and laboratory data Quality Assurance and Quality Control ("QA/QC") requirements as specified in the SAP were met. All soil and groundwater samples are valid and do not require qualification.

5.8 Rail Loading Area

Closure activities in the Rail Loading Area began the week of February 23, 2009 and were completed on March 6, 2009. Closure activities followed the original closure plan.

All piping from this area was removed and examined. Piping from this area was pressure washed and rinsed with water. A sample of the final rinsate was collected and analyzed to verify successful decontamination.

Concrete secondary containment and sumps in this area were pressure washed and rinsed with water. They were then visually inspected by Clean Harbors in accordance with the approved SOPs in the Closure Plan.

One deep and four shallow borings were drilled and sampled by LFR in the Rail Loading Area at locations previously identified in the SAP. A total of 34 soil samples and two groundwater samples (one primary and one duplicate) were collected from the borings in accordance with procedures presented in the SAP. A detailed description of the subsurface investigation activities is presented in Appendix VIII. All field and laboratory data Quality Assurance and Quality Control ("QA/QC") requirements as specified in the SAP were met. All soil and groundwater samples are valid and do not require qualification.

5.9 West Bay Processing Area

Closure activities in the West Bay Processing Area began the week of February 23, 2009 and were completed on March 6, 2009. Closure activities followed the original closure plan.

The process equipment in this unit was pressure washed, rinsed twice and allowed to air dry. A visual inspection was conducted after drying by Clean Harbors in accordance with the approved SOPs in the Closure Plan.

Concrete secondary containment and sumps in this area were pressure washed and rinsed with water. They were then visually inspected by Clean Harbors in accordance with the approved SOPs in the Closure Plan.

One deep and three shallow borings were drilled and sampled by LFR in the West Bay Processing Area at locations previously identified in the SAP. A total of 28 soil samples and one groundwater sample were collected from the borings in accordance with procedures presented in the SAP. A detailed description of the subsurface investigation activities is presented in Appendix VIII. All field and laboratory data Quality Assurance and Quality Control ("QA/QC") requirements as specified in the SAP were met. All soil and groundwater samples are valid and do not require qualification.

5.10 East Bay Processing Area

Closure activities in the East Bay Processing Area began the week of February 23, 2009 and were completed on March 6, 2009. Closure activities followed the original closure plan.

Concrete secondary containment and sumps in this area were pressure washed and rinsed with water. They were then visually inspected by Clean Harbors in accordance with the approved SOPs in the Closure Plan.

One deep and two shallow borings were drilled and sampled by LFR in the East Bay Processing Area at locations previously identified in the SAP. A total of 22 soil samples and one groundwater sample were collected from the borings in accordance with procedures presented in the SAP. A detailed description of the subsurface investigation activities is presented in Appendix VIII. All field and laboratory data Quality Assurance and Quality Control ("QA/QC") requirements as specified in the SAP were met. All soil and groundwater samples are valid and do not require qualification.

6.0 CONCLUSIONS

In conclusion, it is my opinion that the closure of the Romic Environmental Technologies Corp. facility was performed in accordance with the Closure Plan approved by U.S. EPA. All hazardous wastes were removed from the RCRA regulated units and disposed of at authorized treatment/disposal facilities. No evidence of any release was noted at any of the units, except at Tank Farm D. The potential release at Tank Farm D was remediated through removal of impacted soil (see Section 5.3 above). No further regulatory control under RCRA Subtitle C is necessary at this facility to protect human health and the environment.

A discussion of each unit follows below.

6.1 Tank Farm A & B

Aboveground

The six hazardous waste storage tanks in this unit met the clean debris surface standard as specified in the Closure Plan for steel tanks to exit RCRA. The tanks were sold for reuse in an industrial application.

Piping from this unit that contained solidified material was separated and disposed of as RCRA hazardous waste at US Ecology. Pumps and the balance of the piping from this unit met the clean rinsate standard specified in the Closure Plan for piping, pumps, valves, and other small equipment to exit RCRA. Laboratory analytical results of the rinsate are included in Appendix VI. The pumps were sold for reuse in an industrial application. A portion of the piping that met the clean rinsate standard was sold for reuse in an industrial application; a portion was recycled as scrap metal.

Concrete secondary containment and sumps in this area met the clean debris surface standard as specified in the Closure Plan for concrete to remain in place. The concrete was left in place.

Subsurface

As noted in the documentation for Amendment #4 (see Section 3.0 and Appendix II), fluids were encountered beneath the concrete slab and above the HDPE vapor barrier under Tank Farm B.

Based on the observations made during the shallow and deep borings, combined with discussions with closure contractor personnel, it was concluded that the fluids encountered on top of the liner were the result of temporary filling of the secondary containment area during tank cleaning activities. The fluids had likely infiltrated the concrete and were entirely retained on top of the liner.

Based on the results from the soil and groundwater sampling in the shallow and deep borings, there is no evidence of a release to the subsurface at the Tank Farm A&B HWMU.

6.2 Tank Farm C

Aboveground

The five hazardous waste storage tanks in this unit met the clean debris surface standard as specified in the Closure Plan for steel tanks to exit RCRA. The tanks were sold for reuse in an industrial application.

All pumps and piping from this area from this unit met the clean rinsate standard specified in the Closure Plan for piping, pumps, valves, and other small equipment to exit RCRA. Laboratory analytical results of the rinsate are included in Appendix VI. The pumps were sold for reuse in an industrial application. Piping was recycled as scrap metal.

Concrete secondary containment and sumps in this area met the clean debris surface standard as specified in the Closure Plan for concrete to remain in place. The concrete was left in place.

Subsurface

Based on the results from the soil and groundwater sampling in the shallow and deep borings, no evidence of a release to the subsurface has occurred at the Tank Farm C HWMU.

6.3 Tank Farm D

Aboveground

One of the tanks in this unit, Tank 132, did meet the clean debris standard as specified in the Closure Plan for HDPE tanks to exit RCRA. This tank was sold for reuse in an industrial application. The other tank in this unit, Tank 136, was deemed not to have met the clean debris surface standard, and was shipped to US Ecology as a hazardous waste for disposal.

All pumps and piping from this area from this unit met the clean rinsate standard specified in the Closure Plan for piping, pumps, valves, and other small equipment to exit RCRA. Laboratory analytical results of the rinsate are included in Appendix VI. Steel piping was recycled for scrap metal value. Plastic piping was sent to US Ecology for disposal. The pumps were sold for reuse in an industrial application.

Concrete secondary containment and sumps in this area met the clean debris surface standard as specified in the Closure Plan for concrete to remain in place. However, concrete in this area was removed in order to remove an underlying sand layer that exhibited an elevate pH, indicating the possibility of a release from the unit. The elevated pH was confined to samples taken immediately below the concrete, above the HDPE vapor barrier that had been placed beneath the unit. Soil samples taken from immediately below the vapor barrier and extending to depth were within normally occurring ranges. The removed concrete and soil were disposed of as nonhazardous waste.

Subsurface

Based on the results from the soil and groundwater sampling in the shallow and deep borings, no evidence of a release to the subsurface has occurred at the Tank Farm D HWMU.

6.4 Vacuum Pot/Thin Film Evaporator Area

Aboveground

The vacuum pot system in this area had been previously cleaned and removed in November, 2007. Cleaning consisted of processing several batches of a mixture of n-methyl pyrolidone and diethylene glycol (to clean the unit), then processing water to wash the unit. Once the unit was verified clean by the onsite Operations Manager, it was dismantled and shipped to the Clean Harbors Environmental Services, Inc. facility in El Dorado, Arkansas for industrial reuse.

All other tanks and major equipment in this unit (see Table 1) met the clean debris surface standard as specified in the Closure Plan for steel tanks to exit RCRA. The tanks and equipment were sold for reuse in an industrial application. The thin film evaporator system remains onsite.

Piping from this unit that contained solidified material was separated and disposed of as RCRA hazardous waste at US Ecology. Pumps and the balance of the piping from this unit met the clean rinsate standard specified in the Closure Plan for piping, pumps, valves, and other small equipment to exit RCRA. Laboratory analytical results of the rinsate are included in Appendix VI. The pumps were sold for reuse in an industrial application. A portion of the piping that met the clean rinsate standard was sold for reuse in an industrial application; a portion was recycled as scrap metal.

Concrete secondary containment and sumps in this area were pressure washed and rinsed with water. Visual examination was conducted after drying by Clean Harbors Environmental Services, Inc., which verified that the concrete areas were sufficiently clean to meet the clean debris surface standard. All concrete in this area was left in place.

Subsurface

Based on the results from the soil and groundwater sampling in the shallow and deep borings, no evidence of a release to the subsurface has occurred at the Vacuum Pot/Thin Film Unit HWMU.

6.5 Distillation Column Area

Aboveground

The process equipment in this unit was pressure washed, rinsed twice and allowed to air dry. Visual examination was conducted after drying by Clean Harbors Environmental Services, Inc., which verified that the equipment was sufficiently clean to meet the clean debris surface standard. The equipment was sold for reuse in an industrial application.

All pumps and piping from this area were removed and examined. Pumps and piping from this area were pressure washed and rinsed with water. Laboratory analytical results of the rinsate are included in Appendix VI. Based upon the laboratory results, the piping was recycled for scrap metal value. The pumps were sold for reuse in an industrial application.

Concrete secondary containment and sumps in this area met the clean debris surface standard as specified in the Closure Plan for concrete to remain in place. The concrete was left in place.

Subsurface

Based on the results from the soil and groundwater sampling in the shallow and deep borings, no evidence of a release to the subsurface has occurred at the Distillation Unit HWMU.

6.6 VOC System Area

Aboveground

The process equipment in this unit was pressure washed, rinsed twice and allowed to air dry. Visual examination was conducted after drying by Clean Harbors Environmental Services, Inc., which verified that the equipment was sufficiently clean to meet the clean debris surface standard. The equipment remains on site pending sale for reuse in an industrial application. If the equipment remains unsold after approximately September 30, 2009, the equipment will be recycled as scrap metal or disposed, in accordance with the Closure Plan.

All pumps and piping from this area from this unit met the clean rinsate standard specified in the Closure Plan for piping, pumps, valves, and other small equipment to exit RCRA. Laboratory analytical results of the rinsate are included in Appendix VI. Piping was recycled as scrap metal. Some of the small equipment in this unit remains onsite.

Concrete secondary containment and sumps in this area met the clean debris surface standard as specified in the Closure Plan for concrete to remain in place. The concrete was left in place.

Subsurface

Based on the results from the soil and groundwater sampling in the shallow and deep borings in the adjacent Distillation Unit area, no evidence of a release to the subsurface has occurred at the VOC System HWMU.

6.7 Drum Storage Building #1

Aboveground

Concrete secondary containment and sumps in this area met the clean debris surface standard as specified in the Closure Plan for concrete to remain in place. The concrete was left in place.

Subsurface

Based on the results from the soil and groundwater sampling in the shallow and deep borings, no evidence of a release to the subsurface has occurred at the Drum Storage Building #1 HWMU.

6.8 Rail Loading Area

Aboveground

All piping from this unit met the clean rinsate standard specified in the Closure Plan for piping, pumps, valves, and other small equipment to exit RCRA. Laboratory analytical results of the rinsate are included in Appendix VI. The piping was recycled as scrap metal.

Concrete secondary containment and sumps in this area met the clean debris surface standard as specified in the Closure Plan for concrete to remain in place. The concrete was left in place.

Subsurface

Based on the results from the soil and groundwater sampling in the shallow and deep borings, no evidence of a release to the subsurface has occurred at the Rail Loading Area SWMU.

6.9 West Bay Processing Area

Aboveground

The process equipment in this unit was pressure washed, rinsed twice and allowed to air dry. Visual examination was conducted after drying by Clean Harbors Environmental Services, Inc., which verified that the equipment was sufficiently clean to meet the clean debris surface standard. The equipment was sold for reuse in an industrial application.

Concrete secondary containment and sumps in this area met the clean debris surface standard as specified in the Closure Plan for concrete to remain in place. The concrete was left in place.

Subsurface

Based on the results from the soil and groundwater sampling in the shallow and deep borings, no evidence of a release to the subsurface has occurred at the West Bay Processing Area HWMU.

6.10 East Bay Processing Area

Aboveground

Concrete secondary containment and sumps in this area met the clean debris surface standard as specified in the Closure Plan for concrete to remain in place. The concrete was left in place.

Subsurface

Based on the results from the soil and groundwater sampling in the shallow and deep borings, no evidence of a release to the subsurface has occurred at the East Bay Processing Area HWMU.

7.0 CLOSURE CERTIFICATION

7.1 Certification of Owner/Operator

The undersigned, an officer of Romic Environmental Technologies Corporation, a California corporation, with its principal place of business at Suite 800, 820 Gessner Road, Houston, Texas, which formerly owned or operated a hazardous waste treatment, storage, and recycling facility (hereinafter "Facility") known as Romic Southwest and located at 6760 West Allison Road in the Lone Butte Industrial Park, within the Gila River Indian Community, Maricopa County, State of Arizona, has completed and permanently ceased the active operation of the Facility and has fully implemented all measures relating to the closure of the Facility as set forth in the Closure Plan approved by U.S. EPA Region 9 for said Facility.

NOW, THEREFORE, I, Wayne Kiso, President of Romic Environmental Technologies Corporation, hereby swear and affirm that the above-named hazardous waste facility has been closed in accordance with the Facility's Closure Plan approved in writing by Ms. Cheryl Nelson, Manager, RCRA Facilities Management Office, EPA Region 9, on behalf of Mr. Wayne Nastri, Regional Administrator, EPA Region 9, on August 18, 2008, including subsequent approved amendments, that all measures relating to the closure of the facility required by the Closure Plan and the rules and regulations of 40 CFR Part 265, Subpart G have been fully implemented, and that to the best of my knowledge, no violations continue to exist that may have arisen prior to closure.

_____
(Signature)

President
(Title)

820 Gessner Rd, Ste 800, Houston, TX 77024
(Address)

State of California

County of _____

Subscribed and sworn to before me, this 20th day of August, 2009, by Wayne Kiso, proved to me on the basis of satisfactory evidence to be the person who appeared before me.

(seal)

_____
(Signature of Notary Public)

7.2 Certification of Independent Registered Professional Engineer

I, George Oney, a Professional Engineer registered pursuant to the Professional Engineers Registration Law, the California Professional Engineers Act, hereby certify that I have reviewed the Closure Plan for the hazardous waste treatment, storage, and recycling facility at Romic Southwest ("Facility"), located at 6760 West Allison Road, in the Lone Butte Industrial Park within the Gila River Indian Community, Maricopa County, State of Arizona, that I am familiar with the rules and regulations of 40 CFR Part 265, Subpart G pertaining to closure of such facility, and that I personally have made visual inspections of the aforementioned facility, and that the closure of the aforementioned facility has been performed in full and complete accordance with the facility's closure plan approved in writing by Ms. Cheryl Nelson, Manager, RCRA Facilities Management Office, EPA Region 9, on behalf of Mr. Wayne Nastri, Regional Administrator, EPA Region 9, on August 18, 2008, including all subsequent amendments, and the rules and regulations of 40 CFR Part 265, Subpart G.

(Signature)

8/18/09
(Date)

CH004494
(Professional Engineering License Number)

Metro Environmental Services, Inc.
1256-B West Brooks Street
Ontario, California 91762
(Business Address)

909-983-3848
(Telephone Number)

TABLES

Table 1

Inventory of Units and Equipment

Equipment/ Unit ID	Unit/ Location	Permit Capacity/ Dimensions	Closure Performance Standard Met	Disposition
101	**Tank Farm A & B**	5,800 gal.	Steel tanks meeting clean debris surface standard	Exit RCRA (Industrial Reuse)
102		5,800 gal.	Steel tanks meeting clean debris surface standard	Exit RCRA (Industrial Reuse)
103		5,800 gal.	Steel tanks meeting clean debris surface standard	Exit RCRA (Industrial Reuse)
104		5,800 gal.	Steel tanks meeting clean debris surface standard	Exit RCRA (Industrial Reuse)
105		5,900 gal.	Steel tanks meeting clean debris surface standard	Exit RCRA (Industrial Reuse)
112		15,000 gal.	Steel tanks meeting clean debris surface standard	Exit RCRA (Industrial Reuse)
Secondary Containment		47.92’ x 38.67’ x 1.9’	Concrete meeting clean debris surface standard	Remain in Place
Sump		17” x 17” x 10.5”	Concrete meeting clean debris surface standard	Remain in Place
Sump		21” x 21” x 12”	Concrete meeting clean debris surface standard	Remain in Place
Pump		1	Equipment meeting clean debris surface standard	Exit RCRA (Industrial Reuse)
121	**Tank Farm C**	6,500 gal.	Steel tanks meeting clean debris surface standard	Exit RCRA (Industrial Reuse)
122		6,500 gal.	Steel tanks meeting clean debris surface standard	Exit RCRA (Industrial Reuse)
123		6,500 gal.	Steel tanks meeting clean debris surface standard	Exit RCRA (Industrial Reuse)
124		9,000 gal.	Steel tanks meeting clean debris surface standard	Exit RCRA (Industrial Reuse)
113		15,000 gal.	Steel tanks meeting clean debris surface standard	Exit RCRA (Industrial Reuse)

Equipment/ Unit ID	Unit/ Location	Permit Capacity/ Dimensions	Closure Performance Standard Met	Disposition
Secondary Containment		45.25' x 25.83' x 2.5'	Concrete meeting clean debris surface standard	Remain in Place
Sump		21" x 21" x 12"	Concrete meeting clean debris surface standard	Remain in Place
Pump		1	Equipment meeting clean debris surface standard	Exit RCRA (Industrial Reuse)
132	**Tank Farm D**	3,256 gal.	HDPE tanks meeting clean debris surface standard	Exit RCRA (Industrial Reuse)[2]
135[1]		4,106 gal.		
136		4,106 gal.	Drain and remove liquids and residue	TSDF
Secondary Containment		39.67' x 25.83' x 2.5'	Concrete meeting clean debris surface standard	Concrete recycler
Sump		21" x 21" x 12"	Concrete meeting clean debris surface standard	Concrete recycler
Pump		1	Equipment meeting clean debris surface standard	Exit RCRA (Industrial Reuse)
Vacuum Pot[3]	**Vac Pot/Thin Film Area**	1,700 gal.	Steel tanks meeting clean debris surface standard	Exit RCRA (Industrial Reuse)
S-1[3]		600 gal.	Steel tanks meeting clean debris surface standard	Exit RCRA (Industrial Reuse)
S-2[3]		600 gal.	Steel tanks meeting clean debris surface standard	Exit RCRA (Industrial Reuse)
Thin Film Evaporator		24' diam. x 6'	Equipment meeting clean debris surface standard	Exit RCRA (Industrial Reuse)
Receiver		225 gal.	Equipment meeting clean debris surface standard	Exit RCRA (Industrial Reuse)

[1] Closed; closure certification previously submitted to U.S. EPA.

[2] Plastic containment basin was decontaminated and disposed of as nonhazardous waste

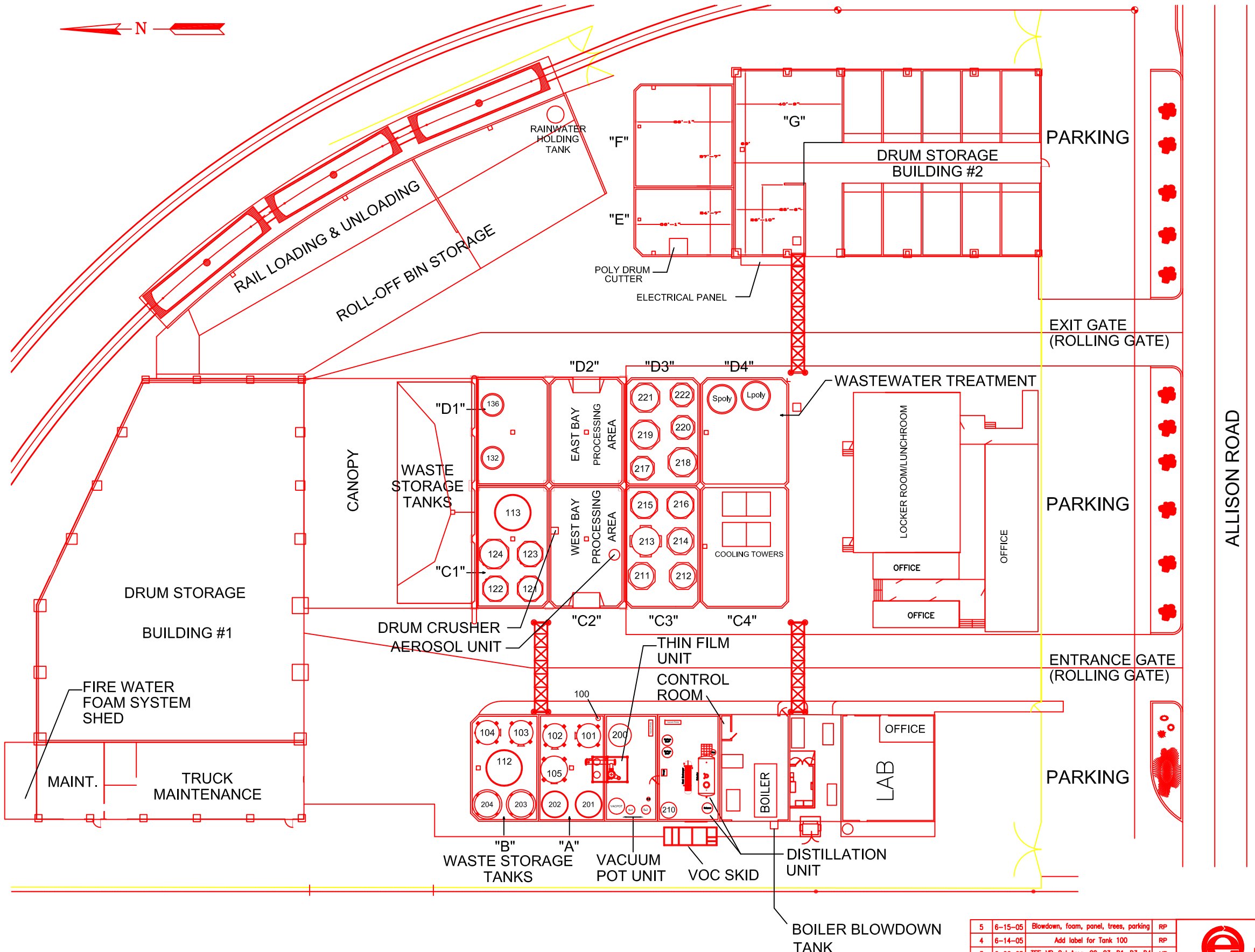
[3] Vessels were cleaned and transferred to Clean Harbors facility for industrial reuse in November 2007

Equipment/ Unit ID	Unit/ Location	Permit Capacity/ Dimensions	Closure Performance Standard Met	Disposition
Flush Tank		225 gal.	Equipment meeting clean debris surface standard	Exit RCRA (Industrial Reuse)
Secondary Containment		39.67’ x 29’ x 1’	Concrete meeting clean debris surface standard	Remain in Place
Sump		1’ X 1.33’ x 0.67’	Concrete meeting clean debris surface standard	Remain in Place
Distillation column	**Distillation Column Area**	30” diam. x	Equipment meeting clean debris surface standard	Exit RCRA (Industrial Reuse)
Reboiler		2,900 gal.	Equipment meeting clean debris surface standard	Exit RCRA (Industrial Reuse)
Separator		85 gal.	Equipment meeting clean debris surface standard	Exit RCRA (Industrial Reuse)
Secondary Containment		38.67’ x 22’ x 0.9’	Concrete meeting clean debris surface standard	Remain in Place
Sump		5.33’ x 4’ x 0.75’	Concrete meeting clean debris surface standard	Remain in Place
Pumps		6	Equipment meeting clean debris surface standard	Exit RCRA (Industrial Reuse)
Pumps		1	Equipment meeting clean debris surface standard	Exit RCRA (Industrial Reuse)
S-1	**VOC System**	318 gal.	Equipment meeting clean debris surface standard	Exit RCRA (Industrial Reuse)
S-2		80 gal.	Equipment meeting clean debris surface standard	Exit RCRA (Industrial Reuse)
S-3		8 gal.	Equipment meeting clean debris surface standard	Exit RCRA (Industrial Reuse)
Secondary Containment		22’ x 10’ x 0.42’	Concrete meeting clean debris surface standard	Remain in Place
Sump		1’ x 1’ x 1’	Concrete meeting clean debris surface standard	Remain in Place
Pumps		4	Equipment meeting clean debris surface standard	Exit RCRA (Industrial Reuse)

Equipment/ Unit ID	Unit/ Location	Permit Capacity/ Dimensions	Closure Performance Standard Met	Disposition
Secondary Containment	**Drum Storage Building #1**	11901 sq. ft.	Concrete meeting clean debris surface standard	Remain in Place
Sump		39.5’ x 1.33’ x 0.5’	Concrete meeting clean debris surface standard	Remain in Place
Canopy Area		5,440 sq. ft.	Concrete meeting clean debris surface standard	Remain in Place
Sump		21” x 21” x 12”	Concrete meeting clean debris surface standard	Remain in Place
Secondary Containment	**Rail Loading Area**	7900 sq. ft.	Concrete meeting clean debris surface standard	Remain in Place
Sump		18” x 18” x 12”	Concrete meeting clean debris surface standard	Remain in Place
Aerosol Can Depressurization/ Crusher Unit	**West Bay Processing Area**	n/a	Equipment meeting clean debris surface standard	Exit RCRA (Industrial Reuse)
Secondary Containment		45.25’ x 29’ x 2.5’	Concrete meeting clean debris surface standard	Remain in Place
Sump		18” x 18” x 12”	Concrete meeting clean debris surface standard	Remain in Place
Secondary Containment	**East Bay Processing Area**	39.67’ x 29’ x 2.5’	Concrete meeting clean debris surface standard	Remain in Place
Sump		18” x 18” x 12”	Concrete meeting clean debris surface standard	Remain in Place

HDPE = High density polyethylene

FIGURES



REV	DATE	REVISION	BY
5	6-15-05	Blowdown, foam, panel, trees, parking	RP
4	6-14-05	Add label for Tank 100	RP
3	6-06-05	TFE-VP-Col Area, C2, C3, D1, D3, D4	HT
2	5-10-05	Make as built drawing	RP

ROMIC
ENVIRONMENTAL TECHNOLOGIES
ENGINEERING DEPARTMENT

ROMIC – SOUTHWEST
CHANDLER, ARIZONA
FACILITY LAYOUT
STORAGE AND TREATMENT AREAS (EXISTING)

DATE: 03-30-04
SCALE: NONE

D-1

I:rsw_partb_04_final\site plans\fig_D1 6-15-05 As Built2-from Haidie