



California Environmental Protection Agency  
Department of Toxic Substances Control

**STANDARDIZED HAZARDOUS WASTE FACILITY  
DRAFT PERMIT, SERIES B**

Facility Name: David H. Fell & Co., Inc.

Owner Name: David H. Fell & Co., Inc.  
6009 Bandini Blvd.  
Bell, CA 90040

Operator Name: David H. Fell & Co., Inc.  
6009 Bandini Blvd.  
Bell, CA 90040

EPA ID Number:  
CAL 000 110 141

Effective Date:

Expiration Date:

Pursuant to California Health and Safety Code sections 25200 and 25201.6, this Standardized Hazardous Waste Facility Permit is hereby issued to:

The Issuance of this Permit is subject to the terms and conditions set forth in Attachment A. This Permit consists of 50 pages, including this cover page and Attachment A.

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Raymond Leclerc, P.E., Team Leader  
Permit Renewal Team  
Department of Toxic Substances Control

Date:

**DAVID H. FELL & CO., INC  
6009 BANDINI BLVD.  
BELL, CA 90040**

**STANDARDIZED HAZARDOUS WASTE FACILITY PERMIT**

**ATTACHMENT "A"**

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**PART I. DEFINITIONS**

All terms used in this Permit shall have the same meaning as those terms have in the California Health and Safety Code, division 20, chapter 6.5 and California Code of Regulations, title 22, division 4.5, unless expressly provided otherwise by this Permit.

1. **"DTSC"** as used in this Permit means the California Department of Toxic Substances Control.
2. **"Facility"** as used in this Permit 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 operational units or combinations of these units.

For the purpose of implementing corrective action under California Code of Regulations, title 22, division 4.5, a hazardous waste facility includes all contiguous property under the control of the owner or operator required to implement corrective action.

3. **"Permittee"** as used in this Permit means the Owner and Operator.
4. **"RCRA"** as used in this Permit means the Resource Conservation and Recovery Act (42 U.S.C. §6901 et seq.).
5. **"RCRA hazardous waste"** as used in this Permit is as defined in Health and Safety Code section 25120.2.
6. **"Non-RCRA hazardous waste"** as used in this Permit is as defined in Health and Safety Code section 25117.9.

**PART II. DESCRIPTION OF THE FACILITY AND OWNERSHIP**

1. Owner of Facility David H. Fell & Co., Inc.  
6009 Bandini Blvd.  
Bell, CA 90040
2. Owner of Real Property David Herman Fell  
6009 Bandini Blvd.  
Bell, CA 90040
3. Operator of Facility David H. Fell & Co., Inc.  
6009 Bandini Blvd.  
Bell, CA 90040
4. Location The Permittee's facility (Facility) address is 6009 Bandini Blvd., Bell, California, 90040, in Los Angeles County, see (Figure 1 Site Schematic Map and Figure 2 Vicinity Map at the back of the permit for location). The Facility is located on land zoned "M" for manufacturing. The Assessor's parcel number is 6332-005-010.
5. Description of Facility Operations David H. Fell & Co., Inc. (DHF) is a precious metal recycling facility. They transfer hazardous waste containing silver and other precious metals from known off-site generators to the Facility under manifests or under bill of lading when qualifying under small quantity exemption. The hazardous waste is analyzed in the DHF laboratory to determine its precious metals contents. The incoming waste is processed to maximize the reclamation of precious metals in the physical form requested by customers. Figure 3 Facility Plot Plan is included at the back of the Permit.
6. Facility History The Facility has been in operation since it was permitted on December 22, 1997. Since then, the Facility has had 3 permit modifications. They are as follows:

September 15, 1999 Class 1\* Modification

The Department of Toxic Substances Control (DTSC) approved this modification to allow DHF to store and treat 220 gallons of liquid silver hazardous waste. DHF previously was only permitted to store silver containing solid hazardous waste. This 220 gallons of liquid silver hazardous waste is approximately 99.5% water and 0.5% silver chips and will be part of Waste Stream J Silver Chips. The additional storage capacity for the Facility with the 220 gallons results in a 2.5% capacity increase. The waste will be stored in Department of Transportation (DOT) approved containers in a dedicated storage area. A Notice of Exemption (NOE) was done for this modification. This modification does not result in a change in facility operations or processing capacity. Currently, DHF stores silver liquid hazardous waste in storage area S-9. The monthly estimated quantity of this waste according to

the DHF permit renewal application is only 1 55-gallon drum. The majority of the silver hazardous waste received by DHF is solid.

November 7, 2002 Two Class 2 Permit Modifications

Item #1

In the first modification, the capacity of Storage Area S-7 was increased from 500 gallons or 10 55-gallon drums to 1100 gallons or 20 55-gallon drums. Storage Area S-7 is a security vault used to store the most valuable precious metals. In order to increase the capacity of the vault, more shelves were built into the vault.

Item #2

The second modification allowed DHF to drop certain baghouse requirements, replacing the testing requirements with restrictions provided by the South Coast Air Quality Control District (SCAQMD). These restrictions are specified in Rule 1407 Compliance Plan and Alternative Emission Control Measure, approved by the District on October 24, 2000. DHF installed polytetrafluoroethylene (PTFE) membrane filters and High Efficiency Particulate Air (HEPA) filters, pressure differential gauges, flow meters, and broken bag detectors.

7. Facility Size and Type for Fee Purposes

This Permit is categorized as a "Series B" Standardized Permit pursuant to Health and Safety Code section 25201.6 and for purposes of Health and Safety Code sections 25205.2 and 25205.19.

8. The closure cost estimate (in 2008 Dollars), as approved by DTSC on the date this permit is approved is \$46,426.39.

**PART III. GENERAL CONDITIONS**

1. PERMIT APPLICATION DOCUMENTS

The Standardized Permit Application dated August 27, 2007 and submitted to DTSC by the Permittee is hereinafter referred to as the "Standardized Permit Application" and is hereby made a part of this Permit by reference.

2. EFFECT OF PERMIT

- (a) The Permittee shall comply with the terms and conditions of this Permit and the provisions of the Health and Safety Code and California Code of Regulations (Cal. Code Regs.), title 22, division 4.5. The issuance of this Permit by DTSC does not release the Permittee from any liability or duty imposed by federal or state statutes or regulations or local ordinances, except the obligation to obtain this Permit. The Permittee shall obtain the permits required by other governmental agencies, including but not limited to, those required by the applicable land use planning, zoning, hazardous waste, air quality, water quality, and solid waste management laws for the construction and/or operation of the Facility.
- (b) The Permittee is permitted to treat and store hazardous wastes in accordance with the terms and conditions of this Permit. Any management of hazardous wastes not specifically authorized in this Permit is strictly prohibited.
- (c) Compliance with the terms and conditions of this Permit does not constitute a defense to any action brought under any other law governing protection of public health or the environment, including, but not limited to, one brought for any imminent and substantial endangerment to human health or the environment.
- (d) DTSC's issuance of this Permit does not prevent DTSC from adopting or amending regulations that impose additional or more stringent requirements than those in existence at the time this Permit is issued and does not prevent the enforcement of these requirements against the Permittee.
- (e) Failure to comply with any term or condition set forth in the Permit in the time or manner specified herein will subject the Permittee to possible enforcement action including but not limited to penalties pursuant to Health and Safety Code section 25187.
- (f) Failure to submit any information required in connection with the Permit, or falsification and/or misrepresentation of any submitted information, is grounds for revocation of this Permit (Cal. Code Regs., tit. 22, §66270.43).

- (g) In case of conflicts between the Operation Plan and the Permit, the Permit conditions take precedence.
- (h) This Permit includes and incorporates by reference any conditions of waste discharge requirements issued to the Facility by the State Water Resources Control Board or any of the California Regional Water Quality Control Boards and any conditions imposed pursuant to section 13227 of the Water Code.

3. COMPLIANCE WITH CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

A draft negative declaration has been prepared in accordance with the requirements of Public Resources Code section 21000 et seq. and the CEQA Guidelines, section 21000 et seq. of California Code of Regulations, title 14.

4. ANNUAL HAZARDOUS WASTE REDUCTION AND MINIMIZATION CERTIFICATION

The Permittee shall certify annually that it has a hazardous waste reduction and minimization program and method in place and shall keep the annual certification as part of its Operating Record in accordance with California Code of Regulations, title 22, section 66264.73(b)(9).

5. ACCESS

- (a) DTSC, its contractors, employees, agents, and/or any United State Environmental Protection Agency representatives are authorized to enter and freely move about the Facility for the purposes of interviewing Facility personnel and contractors; inspecting records, operating logs, and contracts relating to the Facility; reviewing progress of the Permittee in carrying out the terms of Part VI of the Permit; conducting such testing, sampling, or monitoring as DTSC deems necessary; using a camera, sound recording, or other documentary-type equipment; verifying the reports and data submitted to DTSC by the Permittee; or confirming any other aspect of compliance with this Permit, Health and Safety Code, division 20, chapter 6.5, and California Code of Regulations, title 22, division 4.5. The Permittee shall provide DTSC and its representatives access at all reasonable times to the Facility and any other property to which access is required for implementation of any provision of this Permit, Health and Safety Code, division 20, chapter 6.5, and California Code of Regulations, title 22, division 4.5, and shall allow such persons to inspect and copy all records, files, photographs, documents, including all sampling and monitoring data, that pertain to work undertaken pursuant to the entire Permit or undertake any other activity necessary to determine compliance with applicable requirements.

- (b) Nothing in this Permit shall limit or otherwise affect DTSC's right to access and entry pursuant to any applicable State or federal laws and regulations.

**PART IV. PERMITTED UNITS AND ACTIVITIES**

This Permit authorizes operation only of the facility units and activities listed below. The Permittee shall not treat, store or otherwise manage hazardous waste in any unit other than those specified in this Part IV. Any modifications to a unit or activity authorized by this Permit require the written approval of DTSC in accordance with the permit modification procedures set forth in California Code of Regulations, title 22, division 4.5.

UNIT NAME:

Unit #1 Ball Mill

LOCATION:

Powder Processing Area

ACTIVITY TYPE:

Treatment

ACTIVITY DESCRIPTION:

Sweeps, baghouse waste, sink sludge, filters, and slag after being received, or following the roaster furnace or the jaw crusher, will be placed into the ball mill by hand scooping/ shoveling. The ball mill vibrates causing steel balls to grind the material to a fine powder. The ball mill empties into a screen which separates the + and - 60 mesh material. The fines fall into a sealed drum and the oversize is swept out.

PHYSICAL DESCRIPTION:

Unit has dimensions of 62" x 35" and is made of metal.

MAXIMUM CAPACITY:

170 pounds

WASTE TYPES:

Sweeps  
Baghouse Dust  
Sink Sludge  
Filters  
Slag

CALIFORNIA HAZARDOUS WASTE CODES:

U.S. EPA Waste Codes: D008, D011

California Waste Codes: 171, 172, 591

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5

UNIT NAME:

Unit #2 Screen

LOCATION:

Powder Processing Area

ACTIVITY TYPE:

Treatment

ACTIVITY DESCRIPTION:

The sweeps, baghouse dust, sludge, filters, and slag are placed in the screen by hand scooping/shoveling following the roaster furnace, jaw crusher, ball mill or rod mill. Material greater and smaller than 60 mesh are separated by vibrating the screen. The fines fall directly into a sealed drum. The oversize is swept out.

PHYSICAL DESCRIPTION:

This Unit is made from steel and has the dimensions 58" x 35.5".

MAXIMUM CAPACITY:

100 pounds

WASTE TYPES:

Sweeps  
Baghouse dust  
Wastewater  
Sludge  
Filters  
Slag

CALIFORNIA HAZARDOUS WASTE CODES:

U.S. EPA Waste Codes: D008, D011

California Waste Codes: 171, 172, 591

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5

UNIT NAME:

Unit #3 Screen

LOCATION:

Powder Processing Room

ACTIVITY TYPE:

Treatment

ACTIVITY DESCRIPTION:

The sweeps, baghouse dust, sludge, filters, and slag are placed in the screen by hand scooping/shoveling following the roaster furnace, jaw crusher, ball mill or rod mill. Material greater and smaller than 60 mesh are separated by vibrating the screen. The fines fall directly into a sealed drum. The oversize is swept out.

PHYSICAL DESCRIPTION:

The screen has a capacity of 100 pounds and dimensions of 12" by 16".

MAXIMUM CAPACITY:

100 pounds

WASTE TYPES:

Sweeps  
Baghouse dust  
Wastewater  
Sink Sludge  
Filters  
Slag

CALIFORNIA HAZARDOUS WASTE CODES:

U.S. EPA Codes: D008, D011

California Waste Codes: 171, 172, 591

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5

UNIT NAME:

Unit #4 Ball Mill

LOCATION:

Powder Processing Area

ACTIVITY TYPE:

Treatment

ACTIVITY DESCRIPTION:

Sweeps, baghouse waste, sink sludge, filters, and slag after being received, or following the roaster furnace or the jaw crusher, will be placed into the ball mill by hand scooping/ shoveling. The ball mill vibrates causing steel balls to grind the material to a fine powder. The ball mill empties into a screen which separates the + and - 60 mesh material. The fines fall into a sealed drum and the oversize is swept out.

PHYSICAL DESCRIPTION:

This Unit is made of steel and has the dimensions of 31" x 58".

MAXIMUM CAPACITY:

170 pounds

WASTE TYPES:

Sweeps  
Baghouse dust  
Sink Sludge  
Filters  
Slag

CALIFORNIA HAZARDOUS WASTE CODES:

U.S. EPA Codes: D008, D011

California Waste Codes: 171, 172, 591

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5

UNIT NAME:

Unit #5 Screen

LOCATION:

Powder Processing Area

ACTIVITY TYPE:

Treatment

ACTIVITY DESCRIPTION:

The sweeps, baghouse dust, sludge, filters, and slag are placed in the screen by hand scooping/shoveling following the roaster furnace, jaw crusher, ball mill or rod mill. Material greater and smaller than 60 mesh are separated by vibrating the screen. The fines fall directly into a sealed drum. The oversize is swept out.

PHYSICAL DESCRIPTION:

This Unit can hold 120 pounds per batch and has dimensions of 26" x 41".

MAXIMUM CAPACITY:

120 pounds

WASTE TYPES:

Sweeps  
Baghouse dust  
Wastewater  
Sink Sludge  
Filters  
Slag

CALIFORNIA HAZARDOUS WASTE CODES:

U.S. EPA Codes: D008, D011

California Waste Codes: 171, 172, 59

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5

UNIT NAME:

Unit #6 V-Blender

LOCATION:

Powder Processing Area

ACTIVITY TYPE:

Treatment

ACTIVITY DESCRIPTION:

Hazardous waste following the ball mill or screens or rod mills is placed into the Unit by hand scooping/ shoveling. The machine is sealed and then rotates. The material is emptied into a drum, sampled, and sealed.

PHYSICAL DESCRIPTION:

The Unit has dimensions of 19" x 48" and has a capacity of 500 pounds per batch.

MAXIMUM CAPACITY:

500 pounds

WASTE TYPES:

Sweeps  
Wastewater  
Baghouse dust  
Sink Sludge  
Filters  
Slag

CALIFORNIA HAZARDOUS WASTE CODES:

U.S. EPA Codes: D008, D011

California Waste Codes: 171, 172, 591

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5

UNIT NAME:

Unit #7 Blender

LOCATION:

Powder Processing Area

ACTIVITY TYPE:

Treatment

ACTIVITY DESCRIPTION:

Drums of hazardous waste following ball milling, screening, and rod milling get placed in the blender. The drum rotates, mixing the material and is then removed by hand.

PHYSICAL DESCRIPTION:

The dimensions of the steel Unit are 14" x 23" and have a capacity of 50 pounds per batch.

MAXIMUM CAPACITY:

50 pounds

WASTE TYPES:

Sweeps  
Wastewater  
Baghouse dust  
Sink Sludge  
Filters  
Slag

CALIFORNIA HAZARDOUS WASTE CODES:

U.S. EPA Codes: D008, D011

California Waste Codes: 171, 172, 591

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5

UNIT NAME:

Unit #8 Rod Mill

LOCATION:

Powder Processing Area

ACTIVITY TYPE:

Treatment

ACTIVITY DESCRIPTION:

Hazardous waste following processing in the jaw crusher and/or roasting furnaces, is placed into the Rod Mill by hand scooping/shoveling and sealed. The mill rotates, grinding the material into fine powder. The mill is emptied by hand scooping.

PHYSICAL DESCRIPTION:

This Unit is made of steel, has dimensions of 15" by 16" and has a capacity of 30 pounds.

MAXIMUM CAPACITY:

30 pounds

WASTE TYPES:

Sweeps  
Baghouse dust  
Sink Sludge  
Filters  
Slag

CALIFORNIA HAZARDOUS WASTE CODES:

U.S. EPA Codes: D008, D011

California Waste Codes: 171, 172, 591

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5

UNIT NAME:

Unit #9 Rod Mill

LOCATION:

Powder Processing Area

ACTIVITY TYPE:

Treatment

ACTIVITY DESCRIPTION:

Hazardous waste following processing in the jaw crusher and/or roasting furnaces, is placed into the Rod Mill by hand scooping/shoveling and sealed. The mill rotates, grinding the material into fine powder. The mill is emptied by hand scooping.

PHYSICAL DESCRIPTION:

This Unit is made of steel, has dimensions of 14" by 12" and has a capacity of 30 pounds.

MAXIMUM CAPACITY:

30 pounds

WASTE TYPES:

Sweeps  
Baghouse dust  
Sink Sludge  
Filters  
Slag

CALIFORNIA HAZARDOUS WASTE CODES:

U.S. EPA Codes: D008, D011

California Waste Codes: 171, 172, 591

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5

UNIT NAME:

Unit #12 Ball Mill

LOCATION:

Powder Processing Area

ACTIVITY TYPE:

Treatment

ACTIVITY DESCRIPTION:

Hazardous waste following processing in the jaw crusher and/or roasting furnaces, is placed into the Ball Mill by hand scooping/shoveling and sealed. The mill rotates, grinding the material into fine powder. The mill is emptied by hand scooping.

PHYSICAL DESCRIPTION:

This steel Unit has dimensions of 32" by 46" and has a capacity of 400 pounds.

MAXIMUM CAPACITY:

400 pounds

WASTE TYPES:

Sweeps  
Baghouse dust  
Sink Sludge  
Filters  
Slag

CALIFORNIA HAZARDOUS WASTE CODES:

U.S. EPA Codes: D008, D011

California Waste Codes: 171, 172, 591

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5

UNIT NAME:

Unit #13 Jaw Crusher

LOCATION:

Powder Processing Area

ACTIVITY TYPE:

Treatment

ACTIVITY DESCRIPTION:

Hazardous waste following the roaster furnace or as received is poured down the throat of the jaw crusher by hand scooping or shoveling. The crushed particles fall into a sealed tray.

PHYSICAL DESCRIPTION:

The steel Unit has a capacity of 500 pounds and dimensions of 18" x 22"x 47".

MAXIMUM CAPACITY:

500 pounds

WASTE TYPES:

Sweeps  
Slag

CALIFORNIA HAZARDOUS WASTE CODES:

U.S. EPA Codes: D008, D011

California Waste Codes: 172, 591

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5

UNIT NAME:

Unit #14 Roaster Furnace

LOCATION:

Melt Room

ACTIVITY TYPE:

Treatment

ACTIVITY DESCRIPTION:

Hazardous waste is placed into trays by hand scooping/shoveling. The trays are placed into the roaster furnace and burned at approximately 900 – 1100 F. The trays are then placed in the cooling box and cooled, and then the material is either processed in the powder processing section (grinding or screening) or is stored in a drum.

PHYSICAL DESCRIPTION:

The steel Unit has a capacity of 200 pounds and dimensions of 9' x 8'.

MAXIMUM CAPACITY:

200 pounds

WASTE TYPES:

Sweeps  
Sink sludge  
Baghouse dust  
Filters  
Slag

CALIFORNIA HAZARDOUS WASTE CODES:

U.S. EPA Codes: D008, D011

California Waste Codes: 171, 172, 591

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5

UNIT NAME:

Unit #15 Induction Furnace

LOCATION:

Melt Room

ACTIVITY TYPE:

Treatment

ACTIVITY DESCRIPTION:

Hazardous waste is placed in a crucible in the furnace. The material is brought up to between 1900 degrees F and 2300 degrees F. All of the material is poured out of the crucible into molds. One or more chemicals (boric acid, soda ash, sodium nitrate) are added based on the type and quantity of the material charged to the furnace. The slag generated from this operation is put into a Department of Transportation (DOT) approved 55-gallon drum from storage and additional processing at a later date. After the molds cool, the bars are removed from the molds by hand.

PHYSICAL DESCRIPTION:

The steel Unit has a capacity of 13.7 pounds and dimensions of 8" x 17".

MAXIMUM CAPACITY:

13.7 pounds

WASTE TYPES:

Sweeps  
Sink sludge  
Filters  
Slag  
Silver Chip

CALIFORNIA HAZARDOUS WASTE CODES:

U.S. EPA Codes: D008, D011

California Waste Codes: 171, 172, 591

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5

UNIT NAME:

Unit #16 Induction Furnace

LOCATION:

Melt Room

ACTIVITY TYPE:

Treatment

ACTIVITY DESCRIPTION:

Hazardous waste is placed in a crucible in the furnace. The material is brought up to between 1900 degrees F and 2300 degrees F. All of the material is poured out of the crucible into molds. One or more chemicals (boric acid, soda ash, sodium nitrate) are added based on the type and quantity of the material charged to the furnace. The slag generated from this operation is put into a Department of Transportation (DOT) approved 55-gallon drum from storage and additional processing at a later date. After the molds cool, the bars are removed from the molds by hand.

PHYSICAL DESCRIPTION:

The steel Unit has a capacity of 6.4 pounds and dimensions of 8" x 17".

MAXIMUM CAPACITY:

13.7 pounds

WASTE TYPES:

Sweeps  
Sink sludge  
Filters  
Slag  
Silver Chip

CALIFORNIA HAZARDOUS WASTE CODES:

U.S. EPA Codes: D008, D011

California Waste Codes: 171, 172, 591

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5

UNIT NAME:

Unit #17 Induction Furnace

LOCATION:

Melt Room

ACTIVITY TYPE:

Treatment

ACTIVITY DESCRIPTION:

Hazardous waste is placed in a crucible in the furnace. The material is brought up to between 1900 degrees F and 2300 degrees F. All of the material is poured out of the crucible into molds. One or more chemicals (boric acid, soda ash, sodium nitrate) are added based on the type and quantity of the material charged to the furnace. The slag generated from this operation is put into a Department of Transportation (DOT) approved 55-gallon drum from storage and additional processing at a later date. After the molds cool, the bars are removed from the molds by hand.

PHYSICAL DESCRIPTION:

The steel Unit has a capacity of 34 pounds and dimensions of 7" x 13".

MAXIMUM CAPACITY:

34 pounds

WASTE TYPES:

Sweeps  
Sink sludge  
Filters  
Slag  
Silver Chip

CALIFORNIA HAZARDOUS WASTE CODES:

U.S. EPA Codes: D008, D011

California Waste Codes: 171, 172, 591

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5

UNIT NAME:

Unit #18 Induction Furnace

LOCATION:

Melt Room

ACTIVITY TYPE:

Treatment

ACTIVITY DESCRIPTION:

Hazardous waste is placed in a crucible in the furnace. The material is brought up to between 1900 degrees F and 2300 degrees F. All of the material is poured out of the crucible into molds. One or more chemicals (boric acid, soda ash, sodium nitrate) are added based on the type and quantity of the material charged to the furnace. The slag generated from this operation is put into a Department of Transportation (DOT) approved 55-gallon drum from storage and additional processing at a later date. After the molds cool, the bars are removed from the molds by hand.

PHYSICAL DESCRIPTION:

The steel Unit has a capacity of 16 pounds and dimensions of 10" x 16".

MAXIMUM CAPACITY:

16 pounds

WASTE TYPES:

Sweeps  
Sink sludge  
Filters  
Slag  
Silver Chip

CALIFORNIA HAZARDOUS WASTE CODES:

U.S. EPA Codes: D008, D011

California Waste Codes: 171, 172, 591

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5

UNIT NAME:

Unit #18A Induction Furnace

LOCATION:

Melt Room

ACTIVITY TYPE:

Treatment

ACTIVITY DESCRIPTION:

Hazardous waste is placed in a crucible in the furnace. The material is brought up to between 1900 degrees F and 2300 degrees F. All of the material is poured out of the crucible into molds. One or more chemicals (boric acid, soda ash, sodium nitrate) are added based on the type and quantity of the material charged to the furnace. The slag generated from this operation is put into a Department of Transportation (DOT) approved 55-gallon drum from storage and additional processing at a later date. After the molds cool, the bars are removed from the molds by hand.

PHYSICAL DESCRIPTION:

The steel Unit has a capacity of 45 pounds and dimensions of 10" x 16".

MAXIMUM CAPACITY:

450 pounds

WASTE TYPES:

Sweeps  
Sink sludge  
Filters  
Slag  
Silver Chip

CALIFORNIA HAZARDOUS WASTE CODES:

U.S. EPA Codes: D008, D011

California Waste Codes: 171, 172, 591

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5

UNIT NAME:

Unit #19 Gas Furnace

LOCATION:

Melt Room

ACTIVITY TYPE:

Treatment

ACTIVITY DESCRIPTION:

Hazardous waste is placed in a crucible in the furnace. The material is brought up to between 1900 degrees F and 2300 degrees F. All of the material is poured out of the crucible into molds. One or more chemicals (boric acid, soda ash, sodium nitrate) are added based on the type and quantity of the material charged to the furnace. The slag generated from this operation is put into a Department of Transportation (DOT) approved 55-gallon drum from storage and additional processing at a later date. After the molds cool, the bars are removed from the molds by hand.

PHYSICAL DESCRIPTION:

The steel Unit has a capacity of 20.6 pounds and dimensions of 14" x 19".

MAXIMUM CAPACITY:

20.6 pounds

WASTE TYPES:

Sweeps  
Sink sludge  
Filters  
Slag  
Silver Chip

CALIFORNIA HAZARDOUS WASTE CODES:

U.S. EPA Codes: D008, D011

California Waste Codes: 171, 172, 591

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5

UNIT NAME:

Unit #20 Gas Furnace

LOCATION:

Melt Room

ACTIVITY TYPE:

Treatment

ACTIVITY DESCRIPTION:

Hazardous waste is placed in a crucible in the furnace. The material is brought up to between 1900 degrees F and 2300 degrees F. All of the material is poured out of the crucible into molds. One or more chemicals (boric acid, soda ash, sodium nitrate) are added based on the type and quantity of the material charged to the furnace. The slag generated from this operation is put into a Department of Transportation (DOT) approved 55-gallon drum from storage and additional processing at a later date. After the molds cool, the bars are removed from the molds by hand.

PHYSICAL DESCRIPTION:

The steel Unit has a capacity of 20.6 pounds and dimensions of 16" x 14".

MAXIMUM CAPACITY:

20.6 pounds

WASTE TYPES:

Sweeps  
Sink sludge  
Filters  
Slag  
Silver Chip

CALIFORNIA HAZARDOUS WASTE CODES:

U.S. EPA Codes: D008, D011

California Waste Codes: 171, 172, 591

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5

UNIT NAME:

Unit #21 Gas Furnace

LOCATION:

Melt Room

ACTIVITY TYPE:

Treatment

ACTIVITY DESCRIPTION:

Hazardous waste is placed in a crucible in the furnace. The material is brought up to between 1900 degrees F and 2300 degrees F. All of the material is poured out of the crucible into molds. One or more chemicals (boric acid, soda ash, sodium nitrate) are added based on the type and quantity of the material charged to the furnace. The slag generated from this operation is put into a Department of Transportation (DOT) approved 55-gallon drum from storage and additional processing at a later date. After the molds cool, the bars are removed from the molds by hand.

PHYSICAL DESCRIPTION:

The steel Unit has a capacity of 25 - 450 pounds and dimensions of 12" x 24".

MAXIMUM CAPACITY:

450 pounds

WASTE TYPES:

Sweeps  
Sink sludge  
Filters  
Slag  
Silver Chip

CALIFORNIA HAZARDOUS WASTE CODES:

U.S. EPA Codes: D008, D011

California Waste Codes: 171, 172, 591

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5

UNIT NAME:

Unit #22 Gas Furnace

LOCATION:

Melt Room

ACTIVITY TYPE:

Treatment

ACTIVITY DESCRIPTION:

Hazardous waste is placed in a crucible in the furnace. The material is brought up to between 1900 degrees F and 2300 degrees F. All of the material is poured out of the crucible into molds. One or more chemicals (boric acid, soda ash, sodium nitrate) are added based on the type and quantity of the material charged to the furnace. The slag generated from this operation is put into a Department of Transportation (DOT) approved 55-gallon drum from storage and additional processing at a later date. After the molds cool, the bars are removed from the molds by hand.

PHYSICAL DESCRIPTION:

The steel Unit has a capacity of 250 - 1500 pounds and dimensions of 21" x 38".

MAXIMUM CAPACITY:

1500 pounds

WASTE TYPES:

Sweeps  
Sink sludge  
Filters  
Slag  
Silver Chip

CALIFORNIA HAZARDOUS WASTE CODES:

U.S. EPA Codes: D008, D011

California Waste Codes: 171, 172, 591

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5

UNIT NAME:

Unit #23 Gas Furnace

LOCATION:

Melt Room

ACTIVITY TYPE:

Treatment

ACTIVITY DESCRIPTION:

Hazardous waste is placed in a crucible in the furnace. The material is brought up to between 1900 degrees F and 2300 degrees F. All of the material is poured out of the crucible into molds. One or more chemicals (boric acid, soda ash, sodium nitrate) are added based on the type and quantity of the material charged to the furnace. The slag generated from this operation is put into a Department of Transportation (DOT) approved 55-gallon drum from storage and additional processing at a later date. After the molds cool, the bars are removed from the molds by hand.

PHYSICAL DESCRIPTION:

The steel Unit has a capacity of 250 - 1500 pounds and dimensions of 28" x 38".

MAXIMUM CAPACITY:

450 pounds

WASTE TYPES:

Sweeps  
Sink sludge  
Filters  
Slag  
Silver Chip

CALIFORNIA HAZARDOUS WASTE CODES:

U.S. EPA Codes: D008, D011

California Waste Codes: 171, 172, 591

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5

UNIT NAME:

Baghouse #1

LOCATION:

Backyard

ACTIVITY TYPE:

Treatment

ACTIVITY DESCRIPTION:

This Unit is located in the backyard of the Facility and captures all emissions (metal dust, particulates) generated, due to the activities of melting and powder processing operations. The unit contains 210 bags to capture the emissions from the processes. When the bags are saturated with contaminants, they are removed by hand and burned in Roaster Furnace #14, to recover any existing precious metals.

PHYSICAL DESCRIPTION:

The steel Unit has dimensions of 8' x 8' x 24.8'.

MAXIMUM CAPACITY:

N/A

WASTE TYPES:

Sweeps  
Sink sludge  
Filters  
Slag  
Silver Chip

CALIFORNIA HAZARDOUS WASTE CODES:

U.S. EPA Codes: D008, D011

California Waste Codes: 172, 591

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5

UNIT NAME:

Baghouse #2

LOCATION:

Backyard

ACTIVITY TYPE:

Treatment

ACTIVITY DESCRIPTION:

This Unit is located in the backyard of the Facility and captures all emissions (metal dust, particulates) generated, due to the activities of melting and powder processing operations. The unit contains 210 bags to capture the emissions from the processes. When the bags are saturated with contaminants, they are removed by hand and burned in Roaster Furnace #14, to recover any existing precious metals.

PHYSICAL DESCRIPTION:

The steel Unit has dimensions of 8' x 8' x 24.8'.

MAXIMUM CAPACITY:

N/A

WASTE TYPES:

Sweeps  
Sink sludge  
Filters  
Slag  
Silver Chip

CALIFORNIA HAZARDOUS WASTE CODES:

U.S. EPA Codes: D008, D011

California Waste Codes: 172, 591

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5

UNIT NAME:

Evaporator

LOCATION:

Backyard

ACTIVITY TYPE:

Treatment

ACTIVITY DESCRIPTION:

This Unit is located in the backyard of the Facility and evaporates cooling water, and wash water generated in the facility due to washing metal parts. To prevent foaming in this unit, chemical anti-foam is used when needed. The sludge accumulated in this unit is transferred to the roaster furnace, dried, burned to recover any precious metals.

PHYSICAL DESCRIPTION:

The steel Unit has dimensions of 37" x 51" and has a capacity of 250 gallons.

MAXIMUM CAPACITY:

250 gallons

WASTE TYPES:

Sweeps  
Wastewater  
Sink sludge  
Silver Chip

CALIFORNIA HAZARDOUS WASTE CODES:

U.S. EPA Codes: D008, D011

California Waste Codes: 171, 591

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5

UNIT NAME:

Storage Area #1

LOCATION:

Powder Processing Area

ACTIVITY TYPE:

Storage

ACTIVITY DESCRIPTION:

This area stores the waste streams: sweeps, baghouse dust, sink sludge, filters, slag and silver chips.

PHYSICAL DESCRIPTION:

16' x 10'

MAXIMUM CAPACITY:

1159 total equivalent gallons

WASTE TYPES:

Sweeps  
Baghouse dust  
Sink sludge  
Filters  
Slag  
Silver Chip

CALIFORNIA HAZARDOUS WASTE CODES:

U.S. EPA Codes: D008, D011

California Waste Codes: 171, 172, 591

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5

UNIT NAME:

Storage Area #2

LOCATION:

Melt Room

ACTIVITY TYPE:

Storage

ACTIVITY DESCRIPTION:

This area stores the waste streams: sweeps, baghouse dust, sink sludge, filters, slag and silver chips.

PHYSICAL DESCRIPTION:

17' x 20'

MAXIMUM CAPACITY:

2200 total equivalent gallons

WASTE TYPES:

Sweeps  
Baghouse dust  
Sink sludge  
Filters  
Slag  
Silver Chip

CALIFORNIA HAZARDOUS WASTE CODES:

U.S. EPA Codes: D008, D011

California Waste Codes: 171, 172, 591

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5

UNIT NAME:

Storage Area #3

LOCATION:

West Wall next to the roll-up door

ACTIVITY TYPE:

Storage

ACTIVITY DESCRIPTION:

West Wall in the area of the floor scale next to the roll up door.

PHYSICAL DESCRIPTION:

16' x 10'

MAXIMUM CAPACITY:

550 total equivalent gallons

WASTE TYPES:

Sweeps  
Baghouse dust  
Filters  
Slag  
Silver Chip

CALIFORNIA HAZARDOUS WASTE CODES:

U.S. EPA Codes: D008, D011

California Waste Codes: 172, 591

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5

UNIT NAME:

Storage Area #4

LOCATION:

Close to the east wall in the area of the floor scale

ACTIVITY TYPE:

Storage

ACTIVITY DESCRIPTION:

This area stores the waste streams: sweeps, baghouse dust, sink sludge, filters, slag and silver chips.

PHYSICAL DESCRIPTION:

21' x 18'

MAXIMUM CAPACITY:

4400 total equivalent gallons

WASTE TYPES:

Sweeps  
Baghouse dust  
Sink sludge  
Filters  
Slag  
Silver Chip

CALIFORNIA HAZARDOUS WASTE CODES:

U.S. EPA Codes: D008, D011

California Waste Codes: 171, 172, 591

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5

UNIT NAME:

Storage Area #5

LOCATION:

Powder Processing Room

ACTIVITY TYPE:

Storage

ACTIVITY DESCRIPTION:

This area stores the waste streams: sweeps, baghouse dust, sink sludge, filters, slag and silver chips.

PHYSICAL DESCRIPTION:

6.5' x 6'

MAXIMUM CAPACITY:

550 total equivalent gallons

WASTE TYPES:

Sweeps  
Baghouse dust  
Sink sludge  
Filters  
Slag  
Silver Chip

CALIFORNIA HAZARDOUS WASTE CODES:

U.S. EPA Codes: D008, D011

California Waste Codes: 171, 172, 591

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5

UNIT NAME:

Storage Area #6

LOCATION:

Fabrication Room #2

ACTIVITY TYPE:

Storage

ACTIVITY DESCRIPTION:

This area stores the waste streams: mixed acid and silver chips. The secondary containment for this area is made up of a polyethylene container with a 0.83 ft height and total containment of 115 gallons.

PHYSICAL DESCRIPTION:

5' x 5'

MAXIMUM CAPACITY:

133 gallons

WASTE TYPES:

Mixed Acid  
Silver Chip

CALIFORNIA HAZARDOUS WASTE CODES:

U.S. EPA Codes: D002, D011

California Waste Codes: 172, 792

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5

UNIT NAME:

Storage Area #7

LOCATION:

Located on the wall South of the Fabrication Room #2 door

ACTIVITY TYPE:

Storage

ACTIVITY DESCRIPTION:

This Unit is a security vault that stores the waste streams: sweeps, baghouse dust, sink sludge, filters, slag and silver chips.

PHYSICAL DESCRIPTION:

16' x 12'

MAXIMUM CAPACITY:

1100 total equivalent gallons

WASTE TYPES:

Sweeps  
Baghouse dust  
Sink sludge  
Filters  
Slag  
Silver Chip

CALIFORNIA HAZARDOUS WASTE CODES:

U.S. EPA Codes: D008, D011

California Waste Codes: 171, 172, 591

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5

UNIT NAME:

Storage Area #8

LOCATION:

Fabrication Room #2

ACTIVITY TYPE:

Storage

ACTIVITY DESCRIPTION:

This area stores the waste streams: cupels and crucibles.

PHYSICAL DESCRIPTION:

12' x 7'

MAXIMUM CAPACITY:

330 total equivalent gallons

WASTE TYPES:

Cupel  
Crucible

CALIFORNIA HAZARDOUS WASTE CODES:

U.S. EPA Codes: D008

California Waste Codes: 181

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5

UNIT NAME:

Storage Area #9

LOCATION:

Powder Processing Area

ACTIVITY TYPE:

Storage

ACTIVITY DESCRIPTION:

This area stores the waste streams: silver chips. This area has secondary containment made from polyethylene with a height of 0.83 feet and a total containment of 115 gallons.

PHYSICAL DESCRIPTION:

5' x 5'

MAXIMUM CAPACITY:

110 gallons

WASTE TYPES:

Silver Chip

CALIFORNIA HAZARDOUS WASTE CODES:

U.S. EPA Codes: D011

California Waste Codes: 171, 172

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5

UNIT NAME:

Coolant 7A

LOCATION:

Melt Room

ACTIVITY TYPE:

Storage

ACTIVITY DESCRIPTION:

This area stores the waste streams: sweeps, baghouse dust, sink sludge, filters, and slag. This Unit is used to cool hot metal bars and hazardous waste following the melting activities.

PHYSICAL DESCRIPTION:

6.5' x 6'

MAXIMUM CAPACITY:

550 total equivalent gallons

WASTE TYPES:

Sweeps  
Baghouse dust  
Sink sludge  
Filters  
Slag

CALIFORNIA HAZARDOUS WASTE CODES:

U.S. EPA Codes: D008, D011

California Waste Codes: 171, 172, 591

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5

UNIT NAME:

Coolant 7B

LOCATION:

Powder Processing Room

ACTIVITY TYPE:

Storage

ACTIVITY DESCRIPTION:

This area stores the waste streams: sweeps, baghouse dust, sink sludge, and filters. This Unit is used to cool hot metal bars and hazardous waste following melting activities.

PHYSICAL DESCRIPTION:

6.5' x 6'

MAXIMUM CAPACITY:

550 total equivalent gallons

WASTE TYPES:

Sweeps  
Baghouse dust  
Sink sludge  
Filters

CALIFORNIA HAZARDOUS WASTE CODES:

U.S. EPA Codes: D008, D011

California Waste Codes: 171, 172, 591

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5

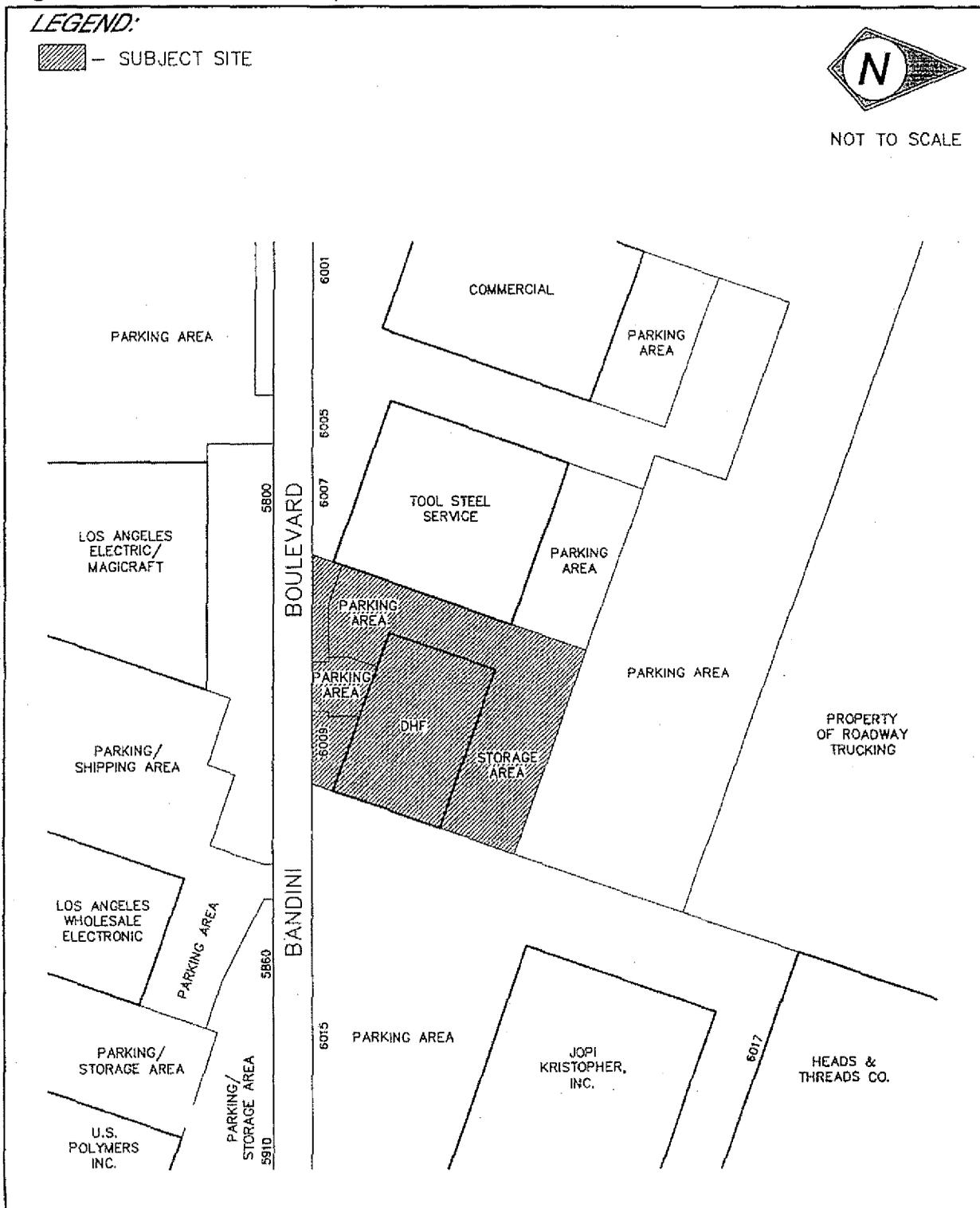
**PART V. SPECIAL CONDITIONS**

- A. All containers in all permitted storage areas shall be considered at maximum capacity at all times.
- B. The Permittee is prohibited from any storage, treatment, or transfer activity not specifically described in this Permit.
- C. The Permittee shall not store more than 500,000 gallons or 500 tons of hazardous waste at any time.
- D. The Permittee shall not treat more than 50,000 gallons of hazardous waste per month.
- E. The Permittee shall not store hazardous waste at the Facility in excess of one calendar year from the time such waste was first stored.
- F. A minimum aisle space of 2.5 feet shall be maintained in all container storage areas to allow for movement of emergency equipment and personnel.

**PART VI - CORRECTIVE ACTION**

1. In the event the Permittee identifies an immediate or potential threat to human health and/or the environment, discovers new releases of hazardous waste and/or hazardous constituents, or discovers new Solid Waste Management Units (SWMUs) not previously identified, the Permittee shall notify DTSC orally within 24 hours of discovery and notify DTSC in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
2. DTSC may require the Permittee to investigate, mitigate and/or take other applicable action to address any immediate or potential threats to human health and/or the environment and newly identified SWMUs or releases of hazardous waste and/or hazardous constituents. If and when corrective action is required at the Facility, the Permittee shall conduct corrective action under either a Corrective Action Consent Agreement or an Enforcement Order for Corrective Action issued by DTSC pursuant to Health and Safety Code sections 25187 and 25200.10.
3. To the extent that work being performed pursuant to Part VI of the Permit must be done on property not owned or controlled by the Permittee, the Permittee shall use its best efforts to obtain access agreements necessary to complete work required by this Part of the Permit from the present owner(s) of such property within 30 days of approval of any workplan for which access is required. "Best efforts" as used in this paragraph shall include, at a minimum, a certified letter from the Permittee to the present owner(s) of such property requesting access agreement(s) to allow the Permittee and DTSC and its authorized representatives access to such property and the payment of reasonable sums of money in consideration of granting access. The Permittee shall provide DTSC with a copy of any access agreement(s). In the event that agreements for the access are not obtained within 30 days of approval of any workplan for which access is required, or of the date that the need for access becomes known to the Permittee, the Permittee shall notify DTSC in writing within 14 days thereafter regarding both efforts undertaken to obtain access and its failure to obtain such agreements. In the event DTSC obtains access, the Permittee shall undertake approved work on such property. If there is any conflict between this permit condition on access and the access requirements in any agreement entered into between DTSC and the Permittee, this permit condition on access shall govern.
4. Nothing in Part VI of the Permit shall be construed to limit or otherwise affect the Permittee's liability and obligation to perform corrective action including corrective action beyond the facility boundary, notwithstanding the lack of access. DTSC may determine that additional on-site measures must be taken to address releases beyond the Facility boundary if access to off-site areas cannot be obtained.

Figure 1: Site Schematic Map



6009 BANDINI BOULEVARD  
BELL, CALIFORNIA

**SITE SCHEMATIC**

*Smith-Emery GeoServices*  
FILE NO.: 93100

DWG BY D.P.  
PLATE NO.: 2

Figure 2: Vicinity Map

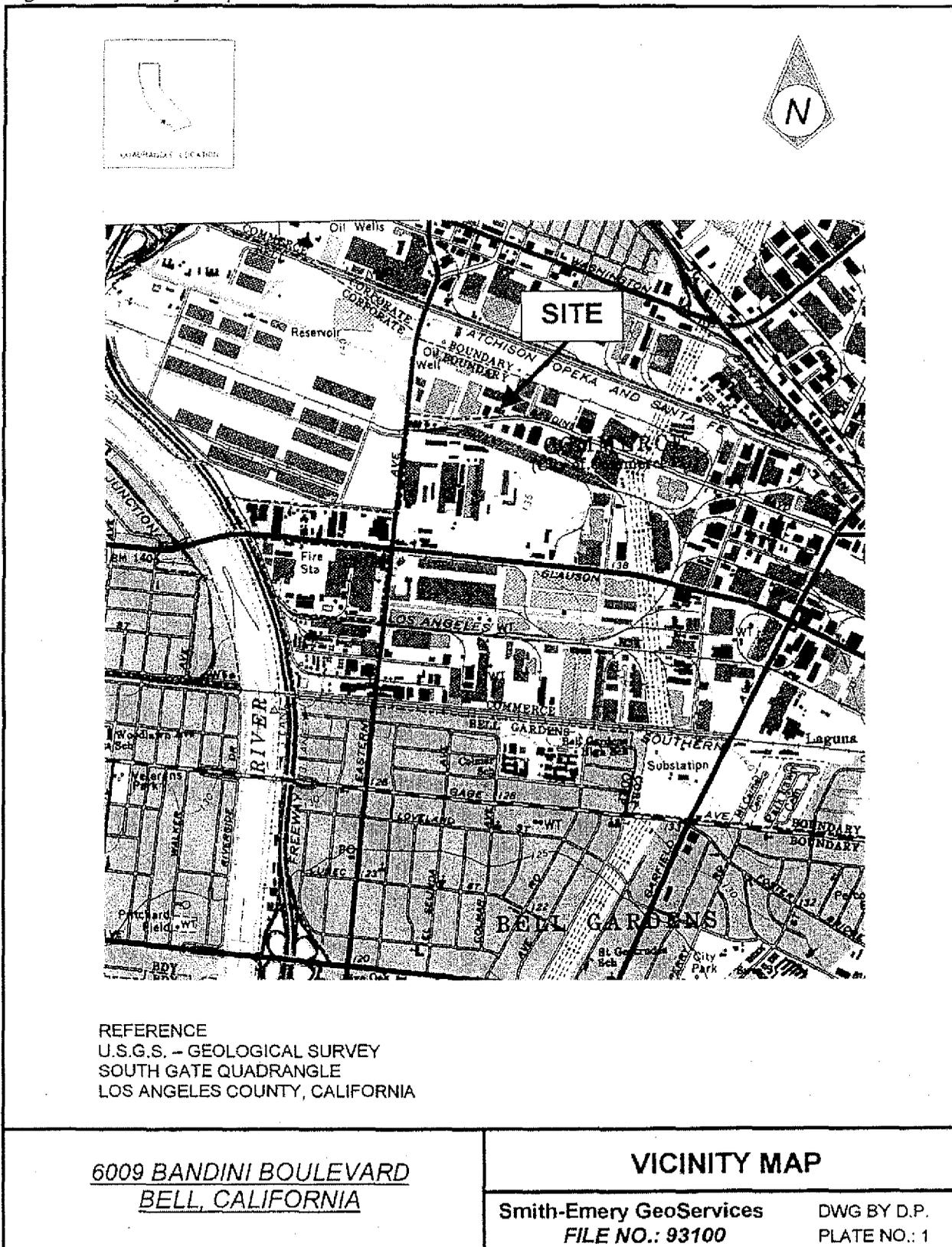
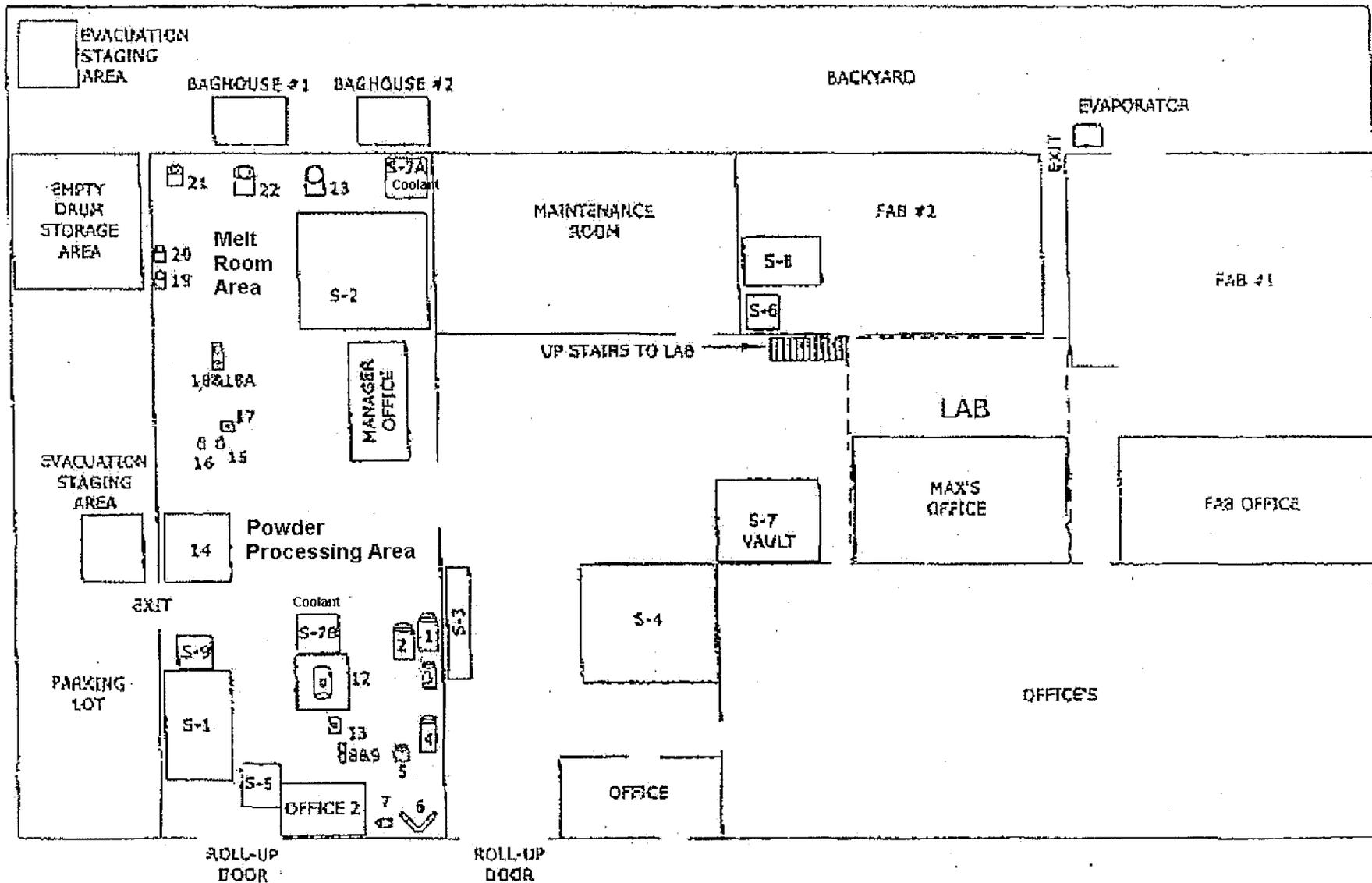


Figure 3 Facility Plot Plan (Legend is on the following page)



Legend for Plot Plan

S-1 through S-9 (Hazardous Waste Storage Areas) Note: S-7 is a vault.

Baghouse #1, Baghouse #2, Evaporator, S-7A and S-7B are labeled on the Plot Plan.

- #1 Ball Mill
- #2 Screen
- #3 Screen
- #4 Ball Mill
- #5 Screen
- #6 V Blender
- #7 Drum Blender
- #8 and #9 Rod Mills
- #12 Large Ball Mill
- #13 Jaw Crusher
- #14 Roaster Furnace
- #15 Induction Furnace
- #16 Induction Furnace
- #17 Induction Furnace
- #18 Induction Furnace
- #18A Induction Furnace
- #19 Gas Furnace
- #20 Gas Furnace
- #21 Gas Furnace
- #22 Gas Furnace
- #23 Gas Furnace