



Department of
Toxic Substances
Control

*The Mission of the
Department of
Toxic Substances
Control is to
provide the highest
level of safety, and
to protect public
health and the
environment from
toxic harm.*



State of California



California
Environmental
Protection Agency

Fact Sheet, November 2008

Draft Permit Renewal Proposed for ECS Refining Facility

The Department of Toxic Substances Control (DTSC) invites you to review and comment on the proposed renewal of the Standardized Hazardous Waste Facility Permit, Series A, for ECS Refining (ECS) located at 705 Reed Street in Santa Clara. ECS Refining is a metal recycler that operates a hazardous waste treatment and storage facility.



ECS Refining Building

The current Permit authorizes operation of the following units:

- Photochemical Processing Unit
- Hot Pot Furnace
- 600 **Crucible** Furnace
- Storage Area I
- Storage Area IV
- Vacuum Evaporation Unit
- Tray Furnace
- 430 Crucible Furnace
- Storage Area IIa
- Storage Area IIb

The Draft Standardized Hazardous Waste Facility Permit (Draft Permit) also proposes to add the E-Waste/Printed Circuit Board Shredder and CRT (Cathode Ray Tube) Glass Washing Unit as permitted units.

The Draft Permit does not propose any operational changes, except for the addition of the two new permitted units. If the Draft Permit is approved, ECS will operate and conduct activities as identified in the Draft Permit.

To provide you with additional information, we invite you to attend and participate in a public meeting. A public meeting is an opportunity for DTSC to receive comments from the community on the Draft Permit renewal.

Please Note: Descriptions of activities for the above permitted areas and a glossary to define bolded technical terms are available on page 4.

Public Comment Period and Meeting

The 45-day public comment period for the Draft Permit begins **November 10** and ends on **December 24, 2008**. Copies of the Draft Permit, Draft Negative Declaration and supporting documents can be viewed at the information repositories listed on page 3 in this fact sheet. Written and e-mailed comments must be postmarked by 5 pm on **December 24, 2008** and sent to:

Ms. Amber Harmon, DTSC Project Manager
700 Heinz Avenue
Berkeley, California 94710

Please e-mail comments to: Aharmon@dtsc.ca.gov

DTSC will conduct a Public Meeting on **December 9, 2008** at 6:30 p.m. at the Santa Clara City, Central Park Library, 2635 Homestead Road in Santa Clara ((408) 615-2933) to explain the Draft Permit, address your questions, and accept your verbal and written comments.

For information on accessibility or to request reasonable accommodations, please contact Ms. Kim Rhodes toll-free at 1-866- 495-5651 or 916- 255-3651 or by e-mail to Krhodes1@dtsc.ca.gov no later than **November 25, 2008**.



In addition to the Draft Permit, DTSC also proposes a Draft Negative Declaration under the California Environmental Quality Act (CEQA) which is also available for public review and comment.

Why a Permit is Necessary

DTSC regulates the generation, storage, treatment and disposal of hazardous waste in California. A permit enables DTSC to effectively regulate the hazardous waste management activities at facilities. Permits are developed after DTSC's detailed technical review, and are intended to ensure that the facility operates in a manner that protects human health and the environment.

Facility Description

ECS has been operating since 1979, and was issued a Standard Hazardous Waste Facility Permit effective December 30, 1997. ECS reclaims precious and **base metals** from **photochemical wastes**, metal-bearing **wastewaters**, tin/lead **solder dross** and related wastes from electronic manufacturing, and other metal-bearing solid hazardous wastes. Gold, Silver, Palladium, and Platinum are recovered from printed circuit boards, integrated circuits and other components, circuit board trim, router dust, metal dust, pastes, wipes, pulps, filters, residues, sludges, plated and inlaid metals, fabricated parts, ores and concentrates.

Silver is also recovered from photo labs, graphic art houses, printers, dentists, radiology labs and circuit shops in the form of liquid wastes, recovery columns, flake and other silver bearing wastes.

ECS also recycles computer monitors and televisions under the Electronic Waste Recycling Act of 2003 (SB20). SB20 allows for free recycling of California-sourced computer monitors and televisions for households, businesses, and government facilities. The printed circuit boards in many personal computers contain precious metal components. This activity is conducted under California's Universal Waste regulations.



Photo of 600 Crucible Furnace

Enforcement History

DTSC inspects ECS Refining on a regular basis to ensure compliance with California laws, regulations, and the Permit conditions. The results of those inspections during the past five years are listed below:

- September 26 and 27, 2006: DTSC conducted a compliance evaluation inspection (CEI) and 3 Class II violations were noted. These Class II violations were for: (1) failure to maintain adequate aisle space, (2) failure to sign a manifest to certify receipt of hazardous waste, and (3) failure to maintain an accurate operating record. These violations were corrected on October 4, 2006. However, subsequent to issuing the Summary of Violations dated October 3, 2006, DTSC also cited ECS for one Class I Violation for multiple instances of unauthorized acceptance of hazardous waste and two Class II Violations for failure to provide annual refresher training for two employees and failure to reconcile manifest discrepancies with a waste generator. *DTSC is in the process of reviewing the facility's response to this violation.*
- January 31, 2006: DTSC conducted a CEI and three Class I Violations and two Class II Violations were noted. The Class I Violations were for: (1) unauthorized acceptance of hazardous waste, (2) unauthorized treatment of hazardous waste, and (3) failure to maintain an accurate processing log and operating record.

ECS returned to compliance on the Class I Violations on March 24, 2006. The two Class II Violations were for maintenance of Training Records and Inspection Records. *These Class II violations were corrected on August 17, 2006.*

- May 28, 2004 and June 2, 2004: DTSC conducted a CEI and two Class II Violations were noted. The first violation was for storing one drum of hazardous waste outside of the permitted area. The second violation involved ECS's failure to submit notification to DTSC of their exports of recyclable materials to a foreign country. *ECS returned to compliance on September 24, 2004.*
- April 16 and 17, 2003: *No violations*

Inspection reports are available for review at DTSC, Berkeley Regional Office located at 700 Heinz Avenue, Berkeley, California 94710.

California Environmental Quality Act – Negative Declaration

DTSC evaluated any possible environmental impacts associated with the proposed operation of this facility, as required by the CEQA. DTSC has completed an Initial Study and prepared a Draft Negative Declaration which states that the hazardous waste facility would not have significant impacts to human health and the environment. The findings are available for public review and comment.

You can Participate in our Permitting Decisions

DTSC encourages public participation in the decision-making process and invites the public to review and comment on the Draft Permit and Draft Negative Declaration. Before making a final determination on the Draft Permit, DTSC will review and respond in writing to all public comments received. A Response to Comments document will be sent to all those who submitted public comments and to those who request a copy. A copy of the Response to Comments will also be placed in the information repositories listed below.

Mission Library Family Reading Center

1089 Lexington Street
Santa Clara, CA 95050

Hours: Mon and Wed	10 a.m. - 9 p.m.
Tues, Thurs, and Fri	10 a.m. - 6 p.m.
Saturday and Sunday	CLOSED

DTSC Regional Records Office

700 Heinz Avenue
Berkeley, California 94710

Hours: Mon – Fri 8 a.m. - 5 p.m.

Please call for an appointment: (510) 540-3800

To view **electronic versions** of the Draft Permit, Draft Negative Declaration and other related documents, please visit DTSC's EnviroStor website: <http://www.envirostor.dtsc.ca.gov/public/>. Enter "Santa Clara" as the City and select **ECS Refining, Santa Clara**. Click on the link "Report" to view electronic documents.



For More Information Contact

Please contact any of the following individuals with any questions or concerns you may have regarding the ECS Facility or public comment period:

For questions regarding the Draft Permit and Draft Negative Declaration, please contact:

Ms. Amber Harmon, DTSC Project Manager,
(510) 540-3779 or by e-mail to
Aharmon@dtsc.ca.gov

For questions regarding the public participation process, please contact:

Ms. Kim Rhodes, Public Participation Specialist,
Toll-free 1 (866) 495-5651 or (916) 255-3651 or
by e-mail to Krhodes1@dtsc.ca.gov

For questions from the media, please contact:

Ms. Claudia Loomis, DTSC Public Information
Officer, (916) 255-6578 or by
e-mail to Cloomis@dtsc.ca.gov.

Notice to Hearing Impaired Individuals

You can obtain additional information by using the California State Relay Service at: 1 (888) 877-5378 (TDD). Ask them to contact Ms. Kim Rhodes at (916) 255-3651.

Glossary

Base Metals: a common and inexpensive metal, as opposed to precious metals (gold, silver, platinum, palladium, etc.) Examples of base metal include iron, nickel, lead and zinc.

Crucible: a container made of high temperature-resistant materials used for heating substances to high temperatures and melting.

Phosphor: any of a number of substances that emit light when excited by light or energized particles such as electrons.

Photochemical Waste: Spent silver-bearing photographic and X-ray developing and printing waste solutions left over after the solutions can no longer be re-used.

Solder Dross: generated by the periodic skimming of molten solder baths used in the production of printed circuit boards and other electronics to remove impurities acquired through use of the molten solder baths.

Wastewater: The spent or used water from a home, community, farm, or industry that contains dissolved or suspended matter.

Activities of proposed permitted units:

The *Photochemical Processing Unit* removes silver from liquid photochemical waste. It may also remove small amounts of other metal contaminants, such as chromium or zinc, from other metal-bearing wastewaters.

The *Vacuum Evaporation Unit* removes the water from photochemicals with silver or other metal-bearing wastewaters.

The *Hot Pot Furnace* is used to melt metal-bearing wastes, primarily silver flake.

The *600 Crucible Furnace* and *430 Crucible Furnace* are gas-fired tilt crucible furnaces used to recover metal from hazardous wastes.

The *E-Waste/Printed Circuit Board Shredder* shreds electronic scrap, printed circuit boards and other similar materials to a specified particle size (typically one to two inches). The shredded materials can then be shipped to primary smelters or other resource recovery facilities for material recovery. *Electronic waste is universal waste and printed circuit boards are classified as scrap metal. Shredding these wastes does not require a permit. However, if a generator classifies electronic scrap as hazardous waste, then shredding that material requires a permit.*

The *Cathode Ray Tube (CRT) Glass Washing Unit* will wash the phosphor coatings from prepared CRT Glass so the glass will be more easily recycled.

Storage Area I – This storage area holds Solder Dross prior to offsite processing.

Storage Area IIa - The room holds two treatment tanks associated with the Photochemical Processing Unit and the Vacuum Evaporation Unit and stores liquid hazardous waste.

Storage Area IIb - This storage area contains four treatment tanks associated with the Photochemical Processing Unit and the Vacuum Evaporation Unit, as well as liquid hazardous waste drum storage. It also holds the Vacuum Evaporation Unit and the unregulated Drum Washing Station.

Storage Area IV - This storage area consists of rows of drums containing liquid and solid hazardous waste.

**Would you like to be added or removed
from the ECS Refining Mailing list?**

If you would like to be added or removed from the mailing list for ECS Refining, please complete the information below and return to Ms. Kim Rhodes, 8800 Cal Center Drive, Sacramento, CA 95826.

You can also e-mail your request to be added or removed from the mailing list by sending a message to Krhodes1@dtsc.ca.gov.

- Please **remove** my name from the mailing list
- Please **add** my name to the mailing list

Name: _____

Address: _____

City/State/Zip: _____

Note: While the mailing list is solely for DTSC use, the list is considered a public record.