

NEGATIVE DECLARATION

Submitting: Draft
 Final
 Mitigated Negative Declaration

Project Title: Hitachi Global Storage Technologies, Incorporated, Permit Renewal and Removal Action Workplan

State Clearinghouse Number: 2005032063

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Project Location (Include County):

5600 Cottle Road, San Jose, California 95193, Santa Clara County. The Hitachi Global Storage Technologies, Inc., (Hitachi GST) facility is located approximately seven miles southeast of downtown San Jose near the intersections of Monterey Highway and Blossom Hill Road. The 332 acre site is approximately bounded by Monterey Highway and the Southern Pacific Railroad right-of-way on the north, Manassas Road on the east, Highway 85 to the south, and Cottle Road on the west.

Project Description:

The Department of Toxic Substances Control (DTSC) is renewing a Hazardous Waste Facility Permit for Hitachi GST in accordance with Section 25200 of the California Health and Safety Code, Division 20, Chapter 7.5 and the California Code of Regulations, Title 22, Division 4.5. The Hitachi GST facility (Facility) would be authorized to perform hazardous waste management activities under a Resource Conservation and Recovery Act (RCRA) equivalent permit as more fully described below. Hitachi GST's hazardous waste management activities are fully described in the Operation Plan (Part "A" and Part "B" Permit Applications), dated January 23, 2003, revised February 11, 2005. The Facility was previously owned and operated by International Business Machines Corporation (IBM) in accordance with Hazardous Waste Facility Permits issued in April 1985 and December 1992.

DTSC is also approving a Removal Action Workplan for a 10.49-acre portion of the Facility proposed to be sold to the City of San Jose. This portion of the Facility is identified as Parcel O-6 and is located on the eastern side of the Facility. Based on samples collected on Parcel O-6, DTSC has determined that corrective action is required for arsenic and asbestos. The Removal Action Workplan proposes removal of approximately 3,000 cubic yards of soil contaminated with arsenic and 2,500 cubic yards of fill material containing naturally occurring asbestos for off-site disposal. The amount of material will require 300 to 350 truckloads. The Removal Action will require approximately 6 weeks of field activities.

Hazardous Waste Facility Permit Renewal:

Facility Operations:

Manufacturing and development activities involving chemical use are primarily etching, coating, plating, cleaning, and assembly. The chemicals used at the Facility include corrosive acids and bases, halogenated and non-halogenated organic solvents, lubricants, adhesives, and resins. Hazardous wastes generated from these processes are either treated on-site or transported off-site for recycling or disposal at an authorized hazardous waste facility. Treatment processes at the Facility include both chemical and physical treatment (e.g., pH adjustment, precipitation, waste bulking, etc.). The waste management activities are primarily conducted at: Building 042 for container storage, waste bulking, and container rinsing; Central Tank Farm B, and various waste vaults for storage in tanks; and Buildings 110 A and D for industrial waste water treatment.

Hazardous Wastes:

Detailed information on the hazardous wastes managed by the Facility can be found in the Section 5.0 of the approved permit application (Operation Plan). The Operation Plan lists 64 waste streams that are routinely managed at the Facility. All hazardous wastes are generated on-site. No wastes are accepted from off-site sources. However, IBM operates as a

tenant on leased Facility portions and waste water from IBM operations is treated in the Hitachi GST Industrial Waste Water Treatment Facility (IWWTF) at Buildings 110 A and D. The Facility handles the following materials types:

- Flammable/combustible:
- Acid:
- Base:
- Oxidizers:
- Poisons:
- General:
- Precious metals:
- Polychlorinated biphenyls (PCB):
- Fluorescent tubes
- Chlorinated fluorocarbons (CFC) strategic reserve.

Building 042:

Building 042 is the central station for receiving, classifying, repackaging, storing and shipping hazardous wastes stored in containers. Building 042 comprises two buildings: one is permitted and includes Hitachi GST hazardous waste only. The other building is the B042 Annex, which stores for less than 90 days containerized waste generated by IBM and is not part of the permit. The permitted Building 042 stores containerized hazardous wastes for greater than 90 days; rinses containers (rinse water is plumbed and treated at Building 110 A-Concentrate Plant), and bulk packages chemically compatible materials. Solvents are primarily transferred into 55-gallon drums. Wastes are delivered to Building 042 in a variety of containers including, but not limited to, drums, cans, bottles and cartons. Depending on the container that is delivered to Building 042, the wastes may be repackaged into Department of Transportation (D.O.T.)/United Nations (UN) approved containers for storage and shipment. These containers include, but are not limited to: carboys; polypropylene drums; roll-off bins; and, unlined and lined, steel drums, fiber drums, and fiberboard boxes.

Waste Storage: Wastes in Building 042 are segregated during storage in rooms to prevent incompatible waste mixing based on hazardous waste properties. A detailed list of the storage rooms and capacities is in the Draft Permit (Exhibit A of the attached Initial Study). The total volume of hazardous waste allowed to be stored in Building 042 is 88,900 gallons, based on the volumetric capacity of the containers. Waste may be stored for no longer than one year. Spill containment is provided by epoxy-urethane coated floors and curbs in the storage rooms and drains to spill containment tanks located in Waste Vaults WV-27 and WV-28.

Waste Bulking: The process of bulking chemicals and chemically contaminated solids having similar hazardous properties is conducted at Building 042 to provide for more efficient, cost-effective waste handling. Chemicals received in small containers are combined into separate larger containers, for example 55-gallon drums or 1 cubic yard fiberboard boxes. Only wastes with similar hazardous properties are placed in the same container.

Container Rinsing: Empty containers previously containing hazardous materials are rinsed in one of two bottle washers, located in Building 042 rooms, Acid Storage 2 or Base Storage 2. The specific bottle washer used depends on the hazardous properties of the chemicals previously held in the container to prevent incompatibility reactions from occurring. The bottle washers typically use only water. The rinse water from the bottle washer in Acid Storage 2 is discharged to a tank in WV-27. The rinse water from the bottle washer in Base Storage 2 is discharged to a tank in WV-28. The rinse water from the waste vault tanks is pumped to the IWWTF in Buildings 110 A and D for treatment prior to discharge to the Publicly Owned Treatment Works (POTW). The rinsed containers are recycled, returned to the vendor, or disposed of in a sanitary (non-hazardous waste) landfill.

Waste Vaults and Central Tank Farm B:

Hazardous Waste Storage in Tanks: Hazardous waste storage tanks are located in waste vaults exterior to the manufacturing or process area buildings where the waste is generated and at Central Tank Farm B. There are 11 waste vaults containing 32 tanks with a combined total capacity of 62,712 gallons. The waste vaults are generally in-ground reinforced concrete structures with a protective coating on the walls and floors. Central Tank Farm B contains 10 tanks each with a capacity of 7,000 gallons for a total capacity of 70,000 gallons. Details about the location, waste, and capacity of the tanks are provided in Exhibit A. In general, tanks in waste vaults containing waste waters are connected by pipelines to the IWWTF at Buildings 110 A and D. Tanks in waste vaults containing organic solvents are connected by pipelines to tanks at Central Tank Farm B. Wastes in tanks that are not treated at the IWWTF are transferred to bulk tanker trucks or containers for off-site recycling or treatment and disposal. Spill containment for the waste tanks is

provided by the waste vaults and, in some cases, also by tank-in-tank construction. All pipelines are secured by secondary containment in the form of pipe-in-pipe construction.

Buildings 110 A and Building 110 D Industrial Waste Water Treatment Facility:

Waste Treatment: The various waste water streams are transmitted from the manufacturing areas to Buildings 110 A and D through a network of pipelines contained in trenches and tunnels. There are two treatment systems at Building 110 Concentrate Waste Water Treatment System and Organic Treatment System. Buildings 110 A and D have 17 hazardous waste tanks ranging in size from 500 to 260,000 gallons with a total capacity of 607,409 gallons.

Building 110 A – Concentrate Waste Water Treatment System: This treatment system includes neutralization and metals removal. The two most common metals removed are copper and nickel. Two waste streams are treated together in the Concentrate Waste Water Treatment System, waste waters that contain metals, and waste water from regeneration of ion exchange resins. The waste streams are combined and neutralized by adding caustic or hydrochloric acid. Then metal precipitant, flocculation aid, and flocculants are added to form insoluble solids with the metals in the waste water. The treatment flow is sent to two flocculation tanks where large flocculation particles form and then to gravity clarifiers where the flocculation particles (containing the waste metals) settle in the bottom of the clarifiers. The solids from the clarifiers are sent to a sludge thickener, a sludge decant tank, and then to a filter press to further reduce the water content of the sludge. The solids from the filter press are stored in a bin below the filter press until sent off-site for disposal. The treated water from the clarifiers flows to a holding sump, is pumped to a final holding tank, and then discharged to the sewer. The sludge from this process is shipped off-site as hazardous waste.

Building 110 D – Organic Treatment System: The Organic Treatment System is designed to treat dilute organic waste water which contains non-chlorinated hydrocarbon wastes. The main source of organic waste water is condensate from steam cleaning of the carbon adsorption scrubbers of the air abatement systems. The organic waste water is collected in a flow equalization tank and pumped to a fixed film reactor and then to two rotating biological contactors (RBCs). Microorganism growth in the fixed film reactor and the RBCs converts the hydrocarbon waste in the waste water to biomass. The treated waste water flows to an effluent sump and is then pumped to the Concentrate Waste Water Treatment System where the suspended biomass is removed with the flocculated metals and the treated water is discharged to the sewer. The Facility has been issued a waste water discharge permit by the San Jose/Santa Clara Waste Water Treatment Plant. There are no plans to change Facility operations or utilities that would impact discharge limits established in this permit or the Publicly Owned Treatment Works (POTW), which is permitted by the Regional Water Quality Control Board. These treatment systems treat the various waste water streams to an acceptable level for the intended use or to meet the discharge requirements set forth by governmental standards. As with most such systems, operational parameters such as flow rates, chemical additives, flow paths, treatment processes, process parameters (including but not limited to pH, suspended solids, total dissolved solids, total organic carbon, heavy metals, etc.) and other aspects of the system are subject to change as operational conditions dictate. Changes to system operation are made as necessary in order to provide continued compliance with the discharge requirements set by the local POTW and other applicable requirements (for example, Occupational Safety and Health Administration, Bay Area Air Quality Management District, etc.).

Removal Action Workplan for Parcel O-6 and Corrective Action Completeness Determination:

Hitachi GST proposes to sell 10.49 acres of the facility property to the City of San Jose for development as a police substation. This property is identified as Parcel O-6 and is located in the eastern corner of the facility near Building 050. The property is bounded by the following roads: Tucson Way, Brooklyn Avenue, Austin Drive, and Manassas Road. Parcel O-6 currently consists of orchards and parking lot areas for Building 050. Parcel O-6 consisted of tree orchard and small farm-related buildings and residences from at least 1939 until the early 1980's when IBM developed Building 050, its parking lots, and the roads surrounding Parcel O-6. In September and October 2004, soil samples were collected from Parcel O-6 and analyzed for metals, organochlorine pesticides (OCPs) and polynuclear aromatic hydrocarbons (PAHs). Samples from fill material under the parking lot were analyzed for asbestos. The sample results are presented in the, "Site Investigation Report, Parcel O-6," dated December 2, 2004, prepared by ENVIRON International, Corporation. Arsenic was detected in the orchard area near Manassas Road at concentrations (maximum 270 mg/kg) above the apparent local background concentration (approximately 9 to 12 mg/kg) and above human health risk criteria. The OCPs 4,4'-DDE, 4,4'-DDT, and Dieldrin were detected, but at concentrations below human and ecological risk criteria. PAHs were not detected in any sample. Asbestos was detected in the fill material underlying the parking lot at concentrations up to 8 percent by weight. Based on these results, DTSC determined that corrective action was required for arsenic - contaminated soil and asbestos-containing fill material on Parcel O-6. DTSC issued a Corrective Action Consent Agreement, Docket No. P2-04/05-002, to Hitachi GST on February 18, 2005, for the corrective action on Parcel O-6.

The "Removal Action Workplan (RAW), Parcel O-6, Hitachi Global Storage Technologies, Inc., 5600 Cottle Road, San Jose, California," dated March 3, 2005, prepared by ENVIRON International, Corporation, describes the corrective action for arsenic and asbestos on Parcel O-6. The RAW identifies area where arsenic or asbestos are in concentrations greater than defined removal action goals. The removal action goal for arsenic is an average concentration of 8 milligrams per kilogram (mg/kg) with a maximum concentration of 12 mg/kg. This goal is based on an evaluation of the concentration of arsenic found in non-contaminated soil in the vicinity of Parcel O-6. The removal action goal for asbestos is 0.25 percent, which is the detection limit of the analysis method. It is estimated that 3,000 cubic yards of soil contaminated with arsenic and 2,500 cubic yards of fill material will be removed for off-site disposal or recycling. Approximately 300 to 350 truckloads will be required over a 4 week period. Dust generation will be controlled in accordance with an Asbestos Dust Mitigation Plan approved by the Bay Area Air Quality Management District. Soil samples will be collected and analyzed to confirm that the removal action goal for arsenic is met. Removal of fill material that contains asbestos in excess of 0.25 percent will be based on visual observation of complete removal of the fill material to the depth of native soil. Overall the removal action will take approximately 6 weeks on-site to complete. When Hitachi GST successfully completes the removal action and reports it to DTSC, then DTSC will make a Corrective Action Complete without Controls determination for Parcel O-6. Also, at that time, Hitachi GST may request a Class 1* permit modification to change the Facility boundaries to remove Parcel O-6 from the Facility.

The proposed development activities on Parcel O-6 are not part of this project. They are evaluated in separate CEQA documents prepared by the City of San Jose. On November 12, 2004, the City of San Jose issued a Mitigated Negative Declaration for the proposed police substation. The project mitigations are related to construction activities that will result from development. This document can be located on the City of San Jose's web site and is titled "Intent to Adopt a Mitigated Negative Declaration, Police Substation number PPO4-304."

Findings of Significant Effect on Environment:
(A copy of the Initial Study which supports this finding is attached.)

On the basis of the information presented in the attached Initial Study, I find that the proposed project will not have a significant effect on the environment.

Mitigation Measures:

DTSC has determined that no additional mitigation measures would be required beyond those incorporated as part of the project to ensure that impacts would be less than significant.

DTSC Branch Chief Signature		Date
Mohinder S. Sandhu, P.E.	Chief, Standardized Permitting and Corrective Action Branch	(916) 255-3716
DTSC Branch Chief Name	DTSC Branch Chief Title	Phone #