



**California Environmental Protection Agency
Department of Toxic Substances Control
*Draft***

HAZARDOUS WASTE POST CLOSURE FACILITY PERMIT

Facility Name:

Former Baron Blakeslee, Inc. Facility
8333 Enterprise Drive
Newark, CA 94560

Owner Name:

Gallade Chemical Enterprises, LLC
8333 Enterprise Drive
Newark, CA 94560

Operator Name:

Honeywell International Inc.
2525 West 190th Street
Torrance, CA 90504-6099

Facility EPA ID Number:

CAD074644659

Effective Date:

Expiration Date:

Pursuant to California Health and Safety Code section 25200, this Resource Conservation and Recovery Act (RCRA)-equivalent Hazardous Waste Facility Permit is hereby issued to: Honeywell International Inc. and Gallade Chemical Enterprises, LLC

The Issuance of this Permit is subject to the terms and conditions set forth in the Approved Application dated January 8, 2009 and the subsequent revisions dated June 12, 2009 and July 30, 2009. The Permit consists of 19 pages including Figures 1, 2 and 3.

Peter Bailey, P.G., Team Leader
Landfills Team
Department of Toxic Substances Control

Date: _____

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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.).

PART II. DESCRIPTION OF THE FACILITY AND OWNERSHIP

1. Owner of Facility

Gallade Chemical Enterprises, LLC
8333 Enterprise Drive
Newark, CA 94560

2. Owner of Real Property

Gallade Chemical Enterprises, LLC
8333 Enterprise Drive
Newark, CA 94560

3. Operator of Facility

Honeywell International Inc.
2525 West 190th Street
Torrance, CA 90504-6099

4. Location

The Facility is located at 8333 Enterprise Drive in the City of Newark, Alameda County, California. The Facility is a rectangle-shaped, level parcel of land, approximately 180 feet wide by 590 feet long, covering approximately 2.4 acres. A site vicinity map is attached as Figure 1. The Facility contains three structures (an office and two warehouses), a parking area, a former liquid tank farm area and an unpaved open area in the northern portion of the Facility. A site plan is attached as Figure 2. The Alameda County Assessor Parcel Number for the Facility is 92-140-5. It is at latitude 37° 11' 260" and longitude 122° 02' 500".

The Facility is located in a mixed industrial/residential area. Residential properties are located to the North and East of the Facility. Adjacent properties to the West and South are either industrial or vacant. The San Mateo County Transit District (Union Pacific Railroad) right of way is located immediately North of the Facility. The Hetch Hetchy Aqueduct crosses the Southern portion of the Facility. Salt evaporation ponds are located approximately 0.5 mile South and West of the Facility.

5. Description of Facility Operations

Former Baron Blakeslee, Inc. (BBI) began operations at the Facility on December 1, 1974. Operations included storage and distribution of virgin chemical products and on-site recovery of chlorinated and fluorinated solvents from waste liquids. In 1993, BBI

ceased its solvent recovery operation and proceeded to close four hazardous waste management units (HWMUs) (the Container Storage Area, the Container Staging Area, the Waste Pump-out Area, and the Brighton Still Assembly and Associated Process Area).

Since 1998, Gallade Chemical Enterprises, LLC (Gallade) has owned the property and operated a facility for the storage and distribution of virgin chemical products. Honeywell International Inc. (Honeywell), successor to BBI, has retained the liability for any release of hazardous waste in the soil and groundwater due to operations by its predecessor companies, including BBI. However, Honeywell does not own the property and has no connection or control over the existing operations conducted by the current owner, Gallade.

6. Facility History

On March 30, 1981, BBI received an interim status document for treatment and storage of solvent waste in containers and tanks at the Facility. The California Department of Health Services, DTSC's predecessor agency, issued a hazardous waste facility permit to BBI on November 7, 1983, and the permit was renewed by DTSC in 1992. In 1993, BBI ceased its operations and submitted a closure work plan to DTSC for decontamination activities. BBI closed four HWMUs (the Container Storage Area, the Container Staging Area, the Waste Pump-out Area, and the Brighton Still Assembly and Associated Process Area) in 1993 and submitted a closure report to DTSC in December 1993. In September 1995, DTSC determined that the Facility was officially closed with the exception that investigations of impacted soil and groundwater were continuing under the direction of the Regional Water Quality Control Board, San Francisco Region (RWQCB).

Because closure performance standards were not achieved during the closure of the four HWMUs, DTSC required Honeywell (the Permittee) to submit a post-closure permit application to address the remaining impacted soil and groundwater at the Facility.

7. Facility Size and Type for Fee Purposes

The Facility is categorized as a medium post-closure facility pursuant to Health and Safety Code section 25205.7(d)(5). For the purpose of Health and Safety Code section 25205.4, the post-closure period for the Facility shall be deemed to start from the effective date of this Permit. DTSC may extend the post-closure monitoring period beyond 30 years to protect human health and the environment.

PART III. GENERAL CONDITIONS

1. PERMIT APPLICATION DOCUMENTS

The DTSC-approved Application dated January 8, 2009 and the subsequent revisions dated June 12, 2009 and July 30, 2009 (Approved Application) are 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 operate, monitor and maintain this Facility for post closure activities in accordance with the terms and conditions of this Permit and the Approved Application. Any management of hazardous wastes not specifically authorized in this Permit or otherwise authorized by DTSC or RWQCB 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 Approved Application 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 Notice of Exemption has been prepared in accordance with the requirements of Public Resources Code, section 21000 et seq. and the CEQA Guidelines, Section 15061(b)(3) of title 14, California Code of Regulations.

4. ENVIRONMENTAL MONITORING

The Permittee shall comply with the applicable environmental monitoring and response program requirements of California Code of Regulations, title 22, division 4.5, chapter 14, articles 6 and 17.

For the purposes of this Permit, a point of compliance (POC) is selected for which the water quality protection standards apply. For the purpose of the POC, the four closed HWMUs shall be considered as one Post Closure Unit. Table 1 (Table 8-1 of the Approved Application) lists each groundwater monitoring well that is part of the post-closure monitoring and describes analytical parameters and sampling frequency for each well.

- (a) For the purpose of California Code of Regulations, title 22, section 66264.91(b), the elements of the Groundwater Monitoring and Response Program (GWMRP) for the Facility are those described in Section 8.2 and Appendix I of the Approved Application.
- (b) For the purpose of California Code of Regulations, title 22, section 66264.92, the Water Quality Protection Standard for the Facility is described in Section 8 and Appendix I of the Approved Application.
- (c) For the purpose of California Code of Regulations, title 22, section

66264.93, the Constituents of Concern (COC) for groundwater at the Facility are described in Section 8 of the Approved Application. The CO for groundwater are 1,1-dichloroethane, methylene chloride, 1,1,1-trichloroethane, 1,1-dichloroethene, tetrachloroethene, 1,1,2-trichlorotrifluoroethane, cis-1,2-dichloroethene, trichloroethene, vinyl chloride, and 1,4-dioxane.

- (d) For the purpose of California Code of Regulations, title 22, section 66264.94, the Concentration Limits for the Facility are described in Section 8.2 of the Approved Application and in Section B of the RWQCB SCR No. R2-2007-0005 or any subsequent revisions made by RWQCB.
- (e) For the purpose of California Code of Regulations, title 22, section 66264.95, the Monitoring Points and the POC for groundwater for the Post Closure Unit at the Facility are described in Section 8.2 and Appendix I of the Approved Application.
- (f) For the purpose of California Code of Regulations, title 22, section 66264.96 the Compliance Period for the Post Closure Unit at the Facility shall be 30 years beginning with the effective date of the Permit. DTSC may extend the post-closure monitoring period beyond the 30 year to protect human health and the environment.
- (g) For the purpose of California Code of Regulations, title 22, section 66270.31, the monitoring, recording, and reporting program for groundwater at the Facility is described in Section 8.2 and Appendix I of the Approved Application. Data for key monitoring parameters or constituents of concern obtained from the designated compliance wells shall be shown on separate graphs. At a minimum, these constituents shall include the COCs.
- (h) Vadose zone monitoring is described in Section 8.3 of the Approved Application. Table 8-5 of the Approved Application lists all soil vapor and ambient air monitoring points and sampling frequency for the Facility. Chemicals of potential concern for vadose zone are tetrachloroethene, trichloroethene, and vinyl chloride.

5. 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 Health and Safety Code section 25202.9 and California Code of Regulations, title 22, section 66264.73(b)(9).

6. ACCESS

- (a) DTSC, its contractors, employees, agents, and/or any United States Environmental Protection Agency representatives, subject to the Facility's safety procedures, 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 the operation, monitoring and maintenance of the Post Closure Unit and activities as described below. Any modifications to the Post Closure Unit or activities 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: Post Closure Unit

There are four closed HWMUs at the Facility: the Container Storage Area, the Container Staging Area, the Waste Pump-out Area, and the Brighton Still Assembly and Associated Process Area. For the purposes of this Permit, the four closed HWMUs shall be considered as one Post Closure Unit.

LOCATION:

The Container Storage Area was located West of the Warehouse and East of the flammable liquid tank farm. The Container Staging Area was located East of the Warehouse at the center of the Facility. The Waste Pump-out Area was located West of the Process Building. The Brighton Still Assembly was located Northeast of the Facility and East of the Waste Pump-out Area. (See Figure 2 of the Permit)

ACTIVITY TYPE:

Soil gas and groundwater monitoring; operation and maintenance activities; site inspection.

ACTIVITY DESCRIPTION:

The activity includes soil vapor and groundwater monitoring, site inspections, repair and maintenance of the monitoring wells and the asphalt/concrete cover as described in Section 8 and Appendix I of the Approved Application. The Facility has an extensive groundwater and soil vapor monitoring network and past and planned remediation activities. Since the entire Facility is covered by the corrective action requirements of the RWQCB SCR Order No. R2-2007-0005 or any subsequent revisions made by RWQCB, the compliance monitoring conducted for this Permit is also considered a "Corrective Action Monitoring Program".

The groundwater monitoring network consists of two up-gradient wells (MW-OS17 and MW-NEW5) and seven POC wells (MW-4, MW-9, MW-10, MW-13, MW-14, MW-NEW1, and MW-NEW4). The up-gradient wells MW-OS17 and MW-NEW5 were designed to represent background water quality conditions. Table 1 of this Permit (Table 8-1 of the Approved Application) lists the groundwater monitoring wells, sampling frequency and analytical parameters. The locations of the nine post closure

monitoring wells are shown in Figure 3 (Figure 8-5 of the Approved Application). The groundwater is monitored under the RWQCB SCR Order No. R2-2007-0005 or any subsequent revisions made by RWQCB and in accordance with Section 8 and Appendix I of the Approved Application. The post-closure monitoring plan for the vadose zone is outlined in Sections 8.1 and 8.3 of the Approved Application. The post-closure soil vapor and ambient air monitoring network is shown in Figure 3 (Figure 8-5 of the Approved Application). Soil vapor monitoring is conducted to assess potential subsurface vapor intrusion issues. Table 8-2 of this Permit (Table 8-5 of the Approved Application) lists the soil vapor monitoring wells and the ambient air monitoring sampling frequency and analytical parameters.

The required operation and maintenance activities for the post-closure monitoring program are described in Section 8.4 of the Approved Application.

WASTE TYPES:

Solvents, ignitables, chlorinated and fluorinated solvents

RCRA HAZARDOUS WASTE CODES:

D001, F001, F002, F003, F004 and F005

TABLE 1
Post-Closure Monitoring Wells, Sampling Frequency and Analytical Parameters
 Former Baron Blakeslee, Inc. Facility, 8333 Enterprise Drive, Newark, California

Well No. (4)	Well Type	Water-bearing Zone	Sampling Frequency (1, 2)	Analyses by USEPA Method (3)
MW-4	Point of Compliance	Shallow	Annually	VOCs by 8260B; 1,4-dioxane by 8270
MW-9	Point of Compliance	Shallow	Semiannually	VOCs by 8260B; 1,4-dioxane by 8270
MW-10	Point of Compliance	Shallow	Annually	VOCs by 8260B; 1,4-dioxane by 8270
MW-13	Point of Compliance	Shallow	Semiannually	VOCs by 8260B; 1,4-dioxane by 8270
MW-14	Point of Compliance	Shallow	Semiannually	VOCs by 8260B; 1,4-dioxane by 8270
MW-OS17	Background	Shallow	Annually	VOCs by 8260B; 1,4-dioxane by 8270
MW-NEW1	Point of Compliance	Newark	Semiannually	VOCs by 8260B
MW-NEW4	Point of Compliance	Newark	Semiannually	VOCs by 8260B
MW-NEW5	Background	Newark	Annually	VOCs by 8260B

Notes:

1. The sampling frequency indicated in this column refers to VOC sampling and analysis; the monitoring frequency for 1,4-dioxane sampling and analysis will be annual.
2. The post-closure monitoring network and frequency may be adjusted in the future, with DTSC's and RWQCB's approval, to ensure adequacy and to be consistent with the data quality objectives of future remediation activities.
3. All samples will be analyzed in the field for pH, dissolved oxygen, electrical conductance, temperature, oxidation-reduction potential, and turbidity.
4. Existing groundwater monitoring wells MW-OS10A, MW-OS22, and MW-NEW7 shall be monitored during the thermal treatment period as interim post-closure wells in place of the abandoned monitoring wells MW-9, MW-10, MW-13, and MW-NEW1.

TABLE 2
Sampling Frequency and Analytical Parameters for Post-Closure Soil Vapor and Ambient Air Monitoring

Former Baron Blakeslee, Inc. Facility, 8333 Enterprise Drive, Newark, California

Well No. (3)	Soil Vapor/Ambient Air	Sampling Frequency (1,2)	Analyses by USEPA Method
SGW-2A, 3A, and 4	Soil Vapor	Semiannual	VOCs by TO-15
AA-5	Ambient Air	Semiannual	VOCs by TO-15 SIM

Notes:

1. The post-closure monitoring network and frequency may be adjusted in the future, with DTSC's and RWQCB's approval, to ensure adequacy and to be consistent with the data quality objectives of future remediation activities.
2. Weather data, including wind direction, temperature, and barometric pressure, will also be collected in conjunction with each sampling event.
3. Existing soil vapor monitoring well SGW-1 shall be monitored during the thermal treatment period as an interim post-closure well in place of the abandoned soil vapor monitoring well SGW-2A

PART V. SPECIAL CONDITIONS

1. The Permittee shall comply with the requirements of the RWQCB SCR No. R2-2007-0005 or any subsequent revisions made by RWQCB. The Permittee shall simultaneously provide to DTSC a copy of all the submittals required by the RWQCB.
2. The Permittee shall comply with the Annual Report requirements specified in California Code of Regulations, title 22, section 66264.75 and shall include the monitoring and response program data in its Annual Report.
3. The Permittee shall conduct semiannual groundwater monitoring, annual soil vapor monitoring, and periodic site inspection, repair and maintenance activities during the post closure care period in accordance with Section 8 and Appendix I of the Approved Application.
4. For the purpose of California Code of Regulations, title 22, section 66270.31, the Permittee shall conduct the monitoring, recording, and reporting program as described in the Section 8 and Appendix I of the Approved Application. The Permittee shall collect groundwater surface level measurements quarterly as described in the Approved Application. In the event that the requirements of California Code of Regulations, title 22, section 66264.97 (e)(15) are amended to allow semi-annual groundwater surface level measurements and if the Permittee can demonstrate to DTSC that semi-annual water level measurements are adequate for the purpose of this Permit, the Permittee may conduct the groundwater surface level measurement events together with the semi annual groundwater sampling events upon receiving written approval from DTSC without a permit modification.
5. The current monitoring well network is subject to change over time as the planned remediation project progresses under the oversight of the RWQCB. For example, in-situ thermal treatment for remediation of VOCs in shallow soil and shallow groundwater in the Former Tank Farm Area required abandonment of monitoring wells within the treatment zone, which include POC post-closure groundwater monitoring wells MW-9, MW-10, MW-13, and MW-NEW1 and soil vapor monitoring well SGW-2A. The well abandonment was completed in August 2009, as approved by the Alameda County Water District and the RWQCB. Groundwater monitoring wells MW-9, MW-10, MW-13, and MW-NEW1 and soil vapor monitoring well SGW-2A will be replaced only after completion of the thermal treatment is completed and during the thermal treatment site restoration activities that are estimated to take place in 2012. In any of these events, the replacement wells shall be installed to the same specifications as the original wells and at approximately the same locations.

6. Existing groundwater monitoring wells MW-OS10A, MW-OS22, and MW-NEW7 shall be monitored during the thermal treatment period as interim post-closure wells in place of the abandoned monitoring wells MW-9, MW-10, MW-13, and MW-NEW1. The locations of the interim wells are shown in Figure 8-1 of the Approved Application.
7. Existing soil vapor monitoring well SGW-1 shall be monitored during the thermal treatment period as an interim post-closure well in place of the abandoned soil vapor monitoring well SGW-2A. The location of this well is shown in Figure 8-2 of the Approved Application.
8. Since the current monitoring well network is subject to change over time, the monitoring well network will be adjusted in the plume area during the In-Situ Chemical Oxidation (ISCO) process, and new performance monitoring wells will most likely be installed. It is expected that at the conclusion of the treatment program, most, if not all, of the technology-specific monitoring wells will be abandoned; the final post-treatment monitoring network will include a network of wells that is sufficient to monitor the soil and groundwater impact that remains at the Facility; and the network will include existing wells, replacement wells for those abandoned to perform treatment, and selected technology-specific monitoring wells. In any of these events, the Permittee may implement repairs, replacement and abandonment of the wells and piezometers, and construction of new post-closure wells and piezometers without a permit modification as long as the Permittee makes these changes in accordance with a workplan approved by the RWQCB and DTSC in writing. The Permittee shall obtain written approval from DTSC and RWQCB for the final post-closure monitoring well network.
9. Within 180 days of the effective date of this Permit, the Permittee shall have a DTSC-approved Land Use Covenant signed and recorded pursuant to California Code of Regulations, title 22, section 67391.1. The Permittee shall reimburse DTSC for its costs incurred in implementing and enforcing the Land Use Covenant, including costs incurred in conducting inspections, preparing inspection reports, and reviewing any Soil Management Plan or Health and Safety Plan as may be required by the Land Use Covenant. The Permittee's payments of DTSC's costs shall be made within 60 days of the date of the billing statement by check payable to the Department of Toxic Substances Control and shall be sent to: Accounting Unit, Department of Toxic Substances Control, P. O. Box 806, Sacramento, California 95812-0806. All checks shall reference the name and address of the Facility.

PART VI. CORRECTIVE ACTION

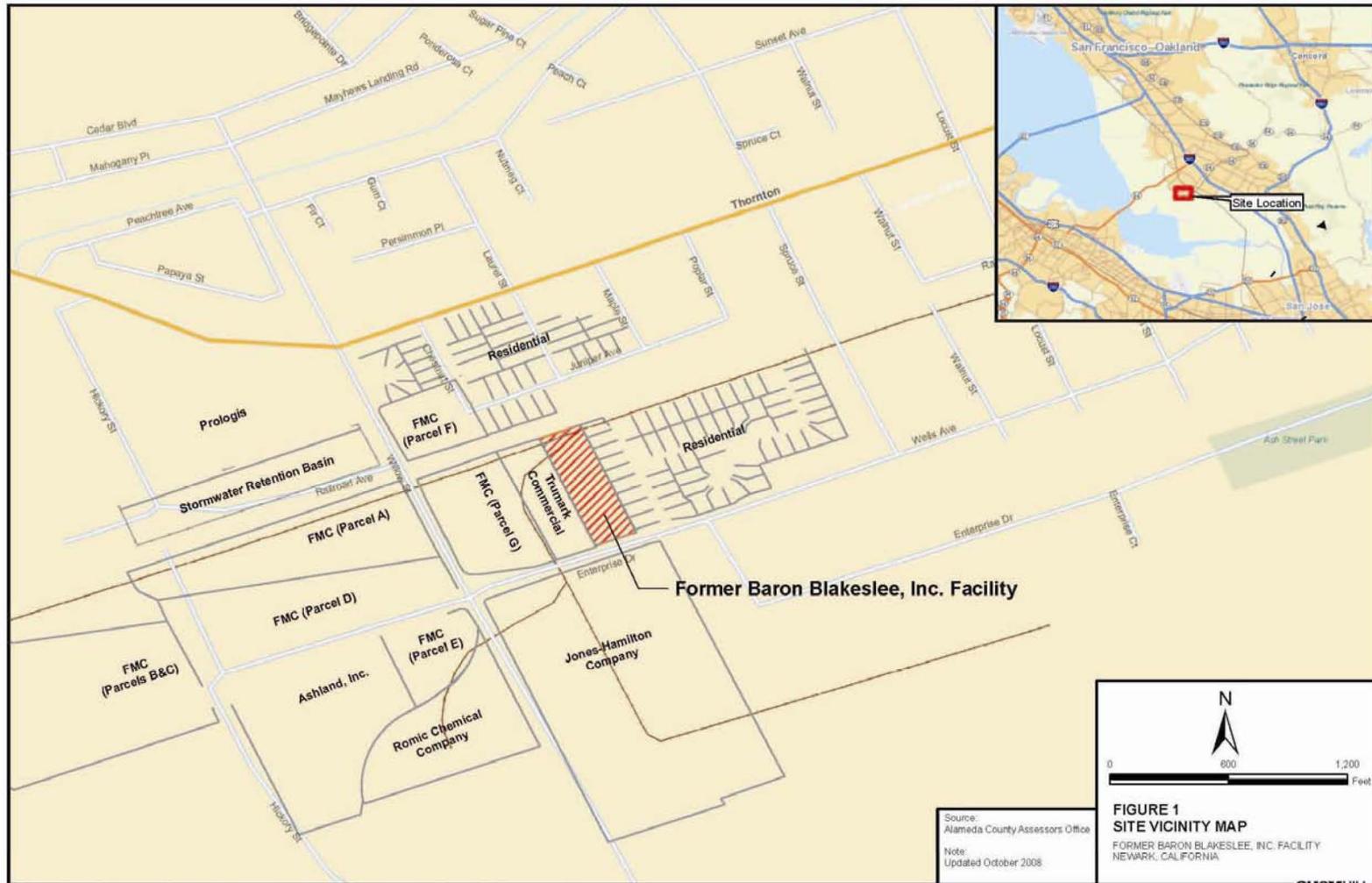
1. The Permittee shall conduct corrective action at the Facility pursuant to Health and Safety Code sections 25187 and 25200.10. Corrective action shall be conducted to address any release of hazardous waste at or from the Facility, particularly from the seven solid waste management units (SWMUs) and four areas of concern (AOCs) as identified in Table 3 (Table 3-1 of the Approved Application). The location of each SWMU and AOC is shown in Figure 2 (Figure 3-2 of the Approved Application).

TABLE 3
Solid Waste Management Units and Areas of Concern
 Former Baron Blakeslee, Inc. Facility, 8333 Enterprise Drive, Newark, California

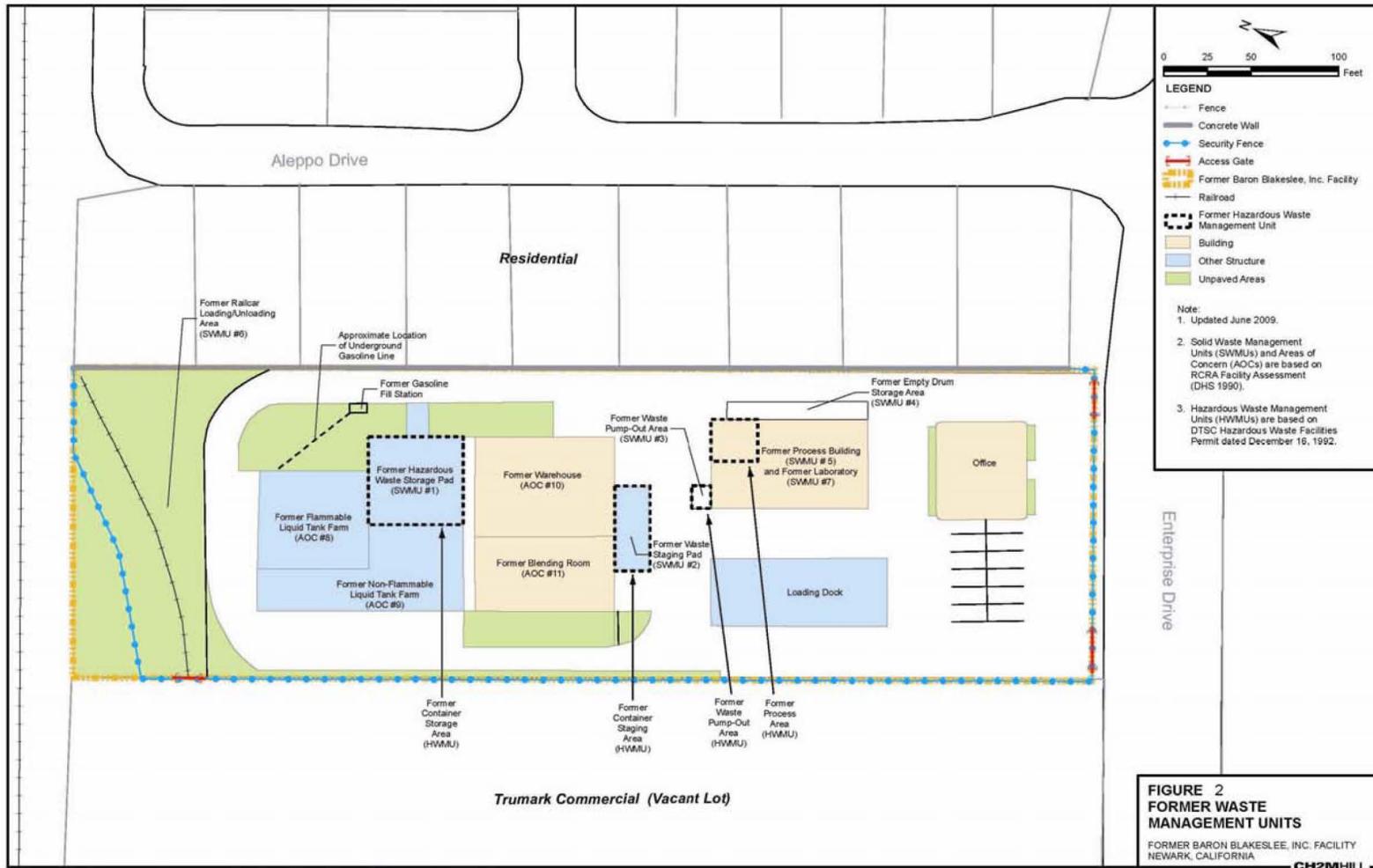
Solid Waste Management Units		Areas of Concern	
Unit No.	Description	Unit No.	Description
1	Hazardous Waste Storage Pad	8	Flammable Tank Farm
2	Waste Staging Pad	9	Non-flammable Tank Farm
3	Waste Pump-out Area	10	Warehouse
4	Empty Drum Storage Area	11	Blending Room
5	Process Area		
6	Railcar Loading/Unloading Area		
7	Laboratory		

2. The Permittee is currently conducting corrective action under the oversight of the RWQCB which is the lead agency for the corrective action at the Facility. In January 2007, the RWQCB adopted the RWQCB SCR Order No. R2-2007-0005 that approved the cleanup plan, set cleanup standards and remediation action levels, and established a schedule for cleanup plan implementation and required long-term monitoring. A soil and groundwater remediation system is being installed in accordance with the RWQCB SCR Order No. R2-2007-0005. The Permittee shall conduct the required corrective action at the Facility in accordance with the RWQCB SCR Order No. R2-2007-0005 and any subsequent revisions made by RWQCB. The RWQCB SCR Order No. R2-2007-0005 and any subsequent revisions made by RWQCB are hereby made a part of this Permit by reference.

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