

October 26, 2007

**BY E-MAIL AND CERTIFIED MAIL:
RECEIPT NO. 7005 0390 0006 4477 4422**

Mr. Mohinder S. Sandhu, P.E., Chief
Department of Toxic Substances Control
Standardized Permit and Corrective Action Branch
8800 Cal Center Drive, MS R1-2
Sacramento, California 95826

Subject: **Briefing Period Arguments on Appeal
Industrial Service Oil Company, Inc.
1700 South Soto Street
Los Angeles, California
USEPA ID No. CAD 099 452 708**

Dear Mr. Sandhu:

On behalf of Industrial Service Oil Company, Inc. (ISOCI) and pursuant to the Department of Toxic Substances Control (DTSC) Order No. HWCA 06/07-P002¹, EP Consultants (EPC) is pleased to submit the following written arguments pertaining to the 20 appeal comments for which DTSC has granted review. The following written arguments with supporting statements of reasons address all 20 appeal comments granted review, including 16 submitted by Communities for a Better Environment (CBE) and four submitted by EPC on behalf of ISOCI.

With respect to the possibility of an Informal Appeals Conference on this matter, please note that EPC and ISOCI are not independently requesting such a conference, but, in the event that such a conference is contemplated or scheduled in the future, ISOCI may choose to be represented and/or provide oral arguments. As such, please inform us of the date, time, location, and participation requirements for any possible Informal Appeals Conference at your earliest convenience.

¹ This is the docket number on DTSC's *Order to Set Briefing Period for Petition for Review and Denial of Review* that was signed by Mr. Mohinder S. Sandhu and mailed to ISOCI by DTSC on June 29, 2007. The order number referenced in DTSC's *Public Notice of Permit Appeal Briefing Period* is HWCA 06/07-P003, of which we have no record. It is our assumption that this is merely a typographical error, and that both references are to the same June 29, 2007 order of which we have a copy. If this is not the case, EPC requests that DTSC immediately provide us with a copy of order HWCA 06/07-P003 and provide EPC at least one week for review and additional briefing comments as necessary.

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ISOCI APPEAL COMMENTS GRANTED REVIEW

A Statement of Reasons for the four ISOCI appeal comments granted review is contained in EPC's March 5, 2007 *Petition/Request for Review of Final Permit Decision* (Petition) that was submitted to Mr. Watson Gin of DTSC. That Statement of Reasons is incorporated herein, with new and supplemental arguments presented below.

Comment 3-1 by ISOCI: This comment states that testing of polychlorinated biphenyl compounds (PCBs) in each truck-to-receiving tank transfer is unnecessary and establishes a precedent which would pose an obstacle to the routine collection and transportation of used oil in California. Alternatively, the comment suggests that ISOCI's Hazardous Waste Facility Permit No. 06-GLN-17 (Final Permit) be revised to allow PCB analysis of used oil from receiving storage tanks.

Attachment 1 includes pages 14-15 from DTSC's December 8, 2006 Response to Comments for American Oil Company's (AOC's) standardized permit. As stated therein by Ms. Jodi Smith on behalf of DeMenno/Kerdoon (D/K):

"At D/K's Compton facility, each tank receiving used oil must be tested to determine whether the used oil contains less than 2 [parts per million, assumed on a weight/volume basis] ppm PCBs. If a tank contains PCBs at a concentration of 2 ppm or greater, D/K must trace the source of the PCBs back to the individual shipment by testing samples that are collected from each of the incoming trucks prior to transferring their loads into a tank. If any of the individual loads contains PCBs at a concentration of 5 ppm or greater, D/K must dispose of the entire tank as PCB-containing hazardous waste.

"In its recent call-in letters to used oil transfer facilities, DTSC sought to impose PCB testing requirements on storage tanks prior to shipment to recycling facilities that are similar to the PCB testing on truck-to-truck transfers that it now proposes at American Oil. The conditions requiring PCB testing for each truck-to-truck transfer in this Permit are of grave concern to D/K because requiring such testing for used oil that is destined for in-state recycling is unnecessary, highly impractical and would pose tremendous delays in routine used oil transportation."

D/K Compton's approach to analyze used oil samples from storage tanks rather than individual truck shipments is consistent with current and proposed operations at ISOCI. Furthermore, DTSC has recognized this argument in responding to D/K's comment, as stated on page 15 of the Response to Comments for AOC:

"...DTSC recognizes that it would be difficult to have each incoming load of used oil tested for PCBs to ensure it does not contain greater than 5 ppm of PCBs.

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Instead, DTSC allows used oil facilities to test each outgoing load for PCBs at 2 ppm to account for the dilution factor.

“These permit conditions are necessary to ensure that the used oil in the outgoing tanker trailer does not contain PCBs at a concentration of 2 ppm or greater. If the test result in the outgoing tanker trailer confirms that the used oil contains PCBs at a concentration of 2 ppm or greater, it would be necessary to test the representative sample taken from each tanker truck before it was unloaded into the tanker trailer to determine whether the used oil in any of the tanker trucks contained PCBs at a concentration at or above 5 ppm; and if it does, the entire tanker trailer would have to be shipped to a facility that is authorized to accept PCB-contaminated hazardous waste. These conditions are necessary to ensure that AOC is receiving the types of hazardous waste that it is authorized to receive, regardless of the final destination of the used oil.

“These permit conditions are practical because testing of each incoming tanker truck is only required after the test result in the outgoing tanker trailer confirms that the used oil contains PCBs at a concentration of 2 ppm or greater.”

Therefore, to be consistent and equitable with respect to PCB testing requirements for D/K Compton, AOC, and existing ISOCI operations, ISOCI requests that the Final Permit be modified to allow for PCB testing of “commingled” used oil in receiving storage tanks with a dilution-based action level of 2 ppm.

Comment 3-2 by ISOCI: This comment states that Special Condition 1(b) on page 52 of the Final Permit regarding the closure cost estimate (CCE) is an erroneous application of the law. In fact, DTSC’s CCE as contained in the Final Permit is based on software and standardized cost factors that are obtained from other agencies and industry average rates for labor, analytical services, equipment, and other cost categories. However, ISOCI and EPC have provided DTSC with CCE amounts for existing and proposed operations based on site-specific third-party quotes for closure-related activities.

Per 22 CCR §66264.142 (see Attachment 2), DTSC’s use of generic software and standardized cost factors is an erroneous application of the law, particularly when a CCE based on third-party quotes is readily available. Quoting 22 CCR §66264.142(a)(2), “[t]he closure cost estimate shall be based on the costs to the owner or operator of hiring a third party to close the facility...”

ISOCI’s CCE was previously provided to DTSC in an August 20, 2004 and October 31, 2005 letters from EPC to Mr. Allan Plaza of DTSC (Attachments 3 and 4). The earlier letter includes actual quotations from “typical service providers that may be used for potential closure activities including contractors, equipment vendors, and

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analytical laboratories,” all of which are third parties. Therefore, it is our present contention that the ISOCI CCE should be the basis of establishing a CCE and financial assurance basis for existing and proposed operations, and not the software version that DTSC has used for the CCE amounts in the Final Permit.

Comment 3-3 by ISOCI: This comment states that Special Condition 2(f) on page 53 of the Final Permit, requiring that all waste profiles shall be analyzed by a certified laboratory on an annual basis, is unnecessarily burdensome and costly to generators, especially those who conduct auto and truck repair and maintenance services and produce used oil and spent antifreeze.

In addition to the arguments provided in EPC’s Petition, ISOCI believes that the mandatory requirement for annual certified analyses is excessive and imposes an undue cost on generators, with no corresponding benefit to the environment or public health. ISOCI believes that it is reasonable and consistent with DTSC and USEPA policy to require annual review of waste profiles, and for additional certified analyses if and when there is a significant change in the nature of accepted wastes or the processes from which such wastes are generated.

A statement to be signed and certified by generators could serve to establish “no significant change” on an annual basis. ISOCI has developed a draft of such a statement, and would be pleased to work with DTSC to establish an approved format/language that is reasonable, protective, and consistent with the spirit and intent of federal Resource Conservation and Recovery Act (RCRA) regulations that state “waste analysis must be repeated as often as necessary to ensure that it is accurate and up to date...” per 40 CFR §§264.13(a)(3)/265.13(a)(3).

Comment 3-4 by ISOCI: This comment states that Special Condition 2(u) on page 57 of the Final Permit requiring that ISOCI obtain a local land use permit is an erroneous application of the law. In addition to the fact that DTSC has no jurisdiction of local land use decisions, it is noted that the ISOCI facility is “permitted by right” as a hazardous waste facility in an M3 heavy manufacturing zone as established by the City of Los Angeles. Therefore, ISOCI does not need a new land use permit for any existing or new activities provided that they do not require new construction that triggers a conditional use permit.

As a “permitted by right” facility, ISOCI has a current, valid land use permit in the context of California HSC §25199.3(a). As repeated in DTSC Order No. HWCA 06/07-P002 at lines 22-23 on page 6, lines 22-23 on page 7, lines 12-13 on page 36, lines 19-22 on page 37, and lines 19-20 on page 38, DTSC has no authority or

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jurisdiction to require a new land use permit/application or conditional use permit/application, and the disputed language imposes such a requirement and should therefore be removed.

For your reference and further consideration, three documents are attached herein – Attachment 5 includes a March 24, 1993 letter from the Los Angeles Department of City Planning (LADCP) to Mr. Jose Kou of DTSC, stating that existing hazardous waste facilities existing prior to August 6, 1990 (as is the case with the ISOCI facility) in the M3 zone are permitted by right. Attachment 6 includes an excerpt from the Los Angeles City Zoning Code, Section 12.24(A) which states that certain conditional use approval procedures apply only to uses in zones when not permitted by right. Attachment 7 is a parcel profile report for ISOCI's facility taken from the LADCP web site that states that the ISOCI property is zoned as M3-1, heavy manufacturing.

ISOCI has every intention of complying with local land use laws, regulations, and ordinances. Should it be required by law, ISOCI will obtain the necessary additional land use or conditional use permit or approval. ISOCI believes that the first part of Special Condition 2(u) which states that ISOCI shall not begin construction without the required local permits fully satisfies the intent of California HSC §25199.3(a), and does not exceed DTSC's jurisdiction.

CBE APPEAL COMMENTS GRANTED REVIEW

Comment 1-7 by CBE: This comment states that the Final Permit allows ISOCI to store up to 250,000 gallons of hazardous wastes in rail cars for up to one year on a rail spur without adequate secondary containment, and that storage of this amount of hazardous waste for such an extended period of time is unprecedented in California.

With respect to secondary containment, all of ISOCI's hazardous waste handling operations have and will continue to comply with the secondary containment requirements prescribed by law at 22 CCR §66264.175. The ISOCI facility has been subject to numerous DTSC inspections that have verified that the secondary containment systems at the existing facility are in compliance with the law, so there is no reason to believe that secondary containment is or will be inadequate.

With respect to the statement pertaining to "unprecedented" amount of hazardous waste for an extended period of time, ISOCI believes that this does not meet the standard for appeal comments per 22 CCR §66271.18(a), in that it is not addressing an erroneous finding of fact or conclusion of law, and it does not address an exercise

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of discretion or important policy consideration. Furthermore, there is no evidence that ISOCI's requested rail car storage would present an unmitigated or significant risk to the public or environment.

Comment 1-9 by CBE: This comment addresses complexity, employee training, waste receiving procedures, and laboratory identification aspects of the Waste Analysis Plan (WAP). While it is understood that the WAP may appear complex and difficult to understand to the layperson, ISOCI personnel have successfully implemented the similar "pre-Part B" WAP at the facility for many years, and there have been no implementation problems due to the "complexity" of the current WAP.

Regarding employee training and waste receiving procedures, ISOCI staff involved with WAP implementation will continue to be properly trained to implement the WAP. If necessary, ISOCI will employ outside training consultants to provide additional training with respect to waste receiving and sample handling procedures, laboratory methods, and data analysis.

With respect to in-house and outside laboratory services, this is a business decision for ISOCI based on the cost, complexity, reliability, turn-around time, and demand for required analytical methods. ISOCI will continue to use laboratory service providers that are accredited and/or certified as required by applicable laws and regulations.

Comment 1-11 by CBE: This comment discusses the adequacy of laboratory methodologies for all the chemicals listed on Table III of ISOCI's hazardous waste permit application. ISOCI intends to continue current practices of accepting only those waste streams for which adequate analytical methods are available for profiling and characterization based on waste codes and generator knowledge.

Comment 1-12 by CBE: This comment states that DTSC has not explained why ISOCI will be allowed to process wastes containing PCBs up to 49 ppm. Federal used oil regulations at 40 CFR §279.10(i) allow up to 50 ppm PCBs in used oil without triggering the applicability of PCB and PCB item management regulations at 40 CFR §761. It is our understanding that this is the basis for DTSC's limit of 49 ppm.

Comment 1-13 by CBE: This comment addresses PCBs testing in commingled used oil and potential PCBs in wastewater. As addressed herein and previously by ISOCI (see above Comment 3-1 by ISOCI), ISOCI agrees that the issue of PCB testing in commingled used oil needs to be modified in the Final Permit, with a condition to address dilution (e.g., an action level of 2 ppm PCBs rather than 5 ppm PCBs).

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Regarding the comment on potential PCBs in wastewater, Table III-4 of ISOCI's hazardous waste permit application (revision 7, August 2005) states that PCBs will be analyzed for waste profiles of non-RCRA wastewaters containing over 10% oil, waste antifreeze containing over 5% oil, and all other incoming waste streams. Any wastewater discharge will have to comply with discharge requirements as established by the Los Angeles Bureau of Sanitation (LABS), which will likely include a prohibition on discharge of hazardous waste as well as extensive analytical requirements. Therefore, ISOCI believes that the concerns raised in CBE's comment, although understandable, are adequately addressed in the current Final Permit.

Comment 1-16 by CBE: This comment states that the Final Permit should require ISOCI to analyze each bulk waste shipment for the characteristic of reactivity. ISOCI does not intend to receive bulk shipments of reactive wastes, and waste code D003 is not listed in Table III-1 of ISOCI's hazardous waste permit application. For all incoming waste streams, ISOCI will continue to require that generators identify the hazardous characteristics of their wastes, including reactivity.

Comment 1-17 by CBE: This comment addresses containerized waste that may potentially exhibit the characteristic of reactivity. ISOCI does not intend to handle containers of reactive wastes. For all incoming waste streams, ISOCI will continue to require that generators identify the hazardous characteristics of their wastes, including reactivity.

Comment 1-20 by CBE: This comment requests clarification of hazardous waste management activities that will be conducted in the "Truck Loading/Unloading and Storage Areas," and associated secondary containment. ISOCI will use this area for transfer, staging, and short term (less than 24 hours) storage of waste before transfer to a container storage area or tank farm. This area has adequate secondary containment for ISOCI's intended use, and will continue to be in compliance with California HSC §25200.19(c)(4).

Comment 1-21 by CBE: This comment states that DTSC must add a narrative that describes the truck loading/unloading activities and the loading/unloading areas, as other permits do. Noting that loading/unloading is not a RCRA-permitted activity, ISOCI believes that there is no statutory basis for any action on this comment.

Comments 1-22 and 1-23 by CBE: These comments address procedures for identifying and segregating incompatible wastes. ISOCI does not intend to handle incompatible waste streams. For all incoming waste streams, ISOCI will continue to

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require that generators identify the hazardous characteristics of their wastes, including incompatibility.

Comment 1-26 by CBE: This comment addresses container management practices and authorized staging practices. Please note that ISOCI intends to handle and store any hazardous waste containers in secondary containment areas.

Comment 1-27 by CBE: This comment states that tank certifications should be conducted every three years, questions DTSC's basis for requiring the certifications every five years, and also requires certification by a California-registered professional engineer with a confined space certification.

In accordance with 22 CCR §66264.192 requires tank assessments be conducted by a California-registered professional engineer, and that the assessments will be valid for a period of five years or less, as determined by the professional engineer. With respect to confined space certification, tank assessments may be conducted without tank entry if methods such as ultrasonic testing are used to determine tank wall thickness. Therefore, a confined space certification would not be required in all cases. In the event that tank entry is necessary, ISOCI will ensure that any personnel that may enter a confined space will have the necessary training, certification, and personal protective equipment.

Comment 1-28 by CBE: This comment states that the CCEs for existing and proposed operations are insufficient. ISOCI agrees that the CCEs in the Final Permit are in dispute and not in compliance with 22 CCR §66264.142, as previously stated in Comment 3-2 by ISOCI and the supplemental arguments supporting that comment as provided in this letter.

Comment 1-29 by CBE: This comment states that DTSC should require revision of the closure plan and CCE to list all facilities permitted to handle waste generated during the closure of the facility. ISOCI believes that the closure plan meets regulatory requirements for existing and proposed operations at the ISOCI facility. With respect to the CCEs, please refer to Comment 3-2 by ISOCI and the supplemental arguments supporting that comment as provided in this letter.

Comment 1-30 by CBE: This comment states that the description of waste streams to be treated by the waste water treatment system in the permit is inconsistent with the description in the Health Risk Assessment (HRA), and that the permit should be amended to require compliance with Clean Water Act (CWA) regulations. As stated in the earlier response to Comment 1-13 by CBE, any ISOCI wastewater discharge

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will have to comply with discharge requirements as established by the LABS. LABS discharge permits typically have extensive requirements pertaining to CWA requirements, including pretreatment standards, concentration and mass based discharge limits, and discharge prohibitions. As any sewer discharge from the ISOCI facility will be to the LABS publicly-owned treatment works (POTW), ISOCI believes that DTSC does not have jurisdiction over this matter and it will be adequately addressed by LABS prior to the sewer discharge of treated wastewater.

With respect to any inconsistencies between the Health Risk Assessment and the Final Permit, , ISOCI believes that this does not meet the standard for appeal comments per 22 CCR §66271.18(a), in that it is not addressing an erroneous finding of fact or conclusion of law, and it does not address an exercise of discretion or important policy consideration. Furthermore, the HRA and Final Permit were both prepared by DTSC and/or DTSC contractor, and ISOCI leaves it up to DTSC to address any potential inconsistencies in an appropriate manner.

On behalf of ISOCI, EPC appreciates your attention to the aforementioned comments. If you have any questions or comments, please call me at (310) 541-5407.

Very truly yours,

E P CONSULTANTS

//original signed by//

Anu Sood, P.E., C.P.P., R.E.A.
Principal
anu@epconsultants.net

Attachments:

- 1 Excerpts from Response to Comments for AOC (Pages 14-15; 12/8/06)
- 2 22 CCR §66264.142 (Closure Cost Estimate)
- 3 EPC Letter on Closure Cost Estimate to Mr. Allan Plaza (8/20/04)
- 4 EPC Letter on Closure Cost Estimate to Mr. Allan Plaza (10/31/05)
- 5 LADCP Letter on Permit by Right to Mr. Jose Kou (3/24/93)
- 6 Excerpt from LA City Zoning Code, Section 12.24 §§(A)-(H)
- 7 LADCP Parcel Profile Report for ISOCI Facility (1/23/06)

cc: Claudia Bohorquez, Attorney-at-Law
John Shubin, ISOCI

Attachment 1

Excerpts from Response to Comments for
AOC (Pages 14-15; 12/8/06)

Commenter #4: Jodi Smith of Paul, Hastings, Janofsky, & Walker LLP on behalf of DeMenno/Kerdoon (Letter dated May 22, 2006)

Comment #4-1

The following comments on the Draft Standardized Hazardous Waste Facility Permit ("Permit") for the American Oil Company ("American Oil") are being submitted on behalf of DeMenno/Kerdoon ("D/K"). D/K wishes to provide the following comments on this Permit in the context of DTSC's recent aborted effort to call in permit modifications for PCB testing at all in-state used oil transfer facilities. D/K believes that the requirement for PCB testing on each truck-to-truck transfer, without regard for the destination of the waste, would set a precedent for other transfer facilities. Implementation of this proposal at all in-state transfer facilities would adversely affect the California used oil industry and California consumers. D/K proposes that DTSC instead limit the mandatory PCB testing to all tankers of used oil that will be sent out of state. If the oil will be processed in-state at a permitted treatment and recycling facility, the oil should be tested at the in-state facility consistent with that facility's WAP. D/K also proposes that DTSC enhance compliance with Health and Safety Code Section 25250.09.

At D/K's Compton facility, each tank receiving used oil must be tested to determine whether the used oil contains less than 2 ppm PCBs. If a tank contains PCBs at a concentration of 2 ppm or greater, D/K must trace the source of the PCBs back to the individual shipment by testing samples that are collected from each of the incoming trucks prior to transferring their loads into a tank. If any of the individual loads contains PCBs at a concentration of 5 ppm or greater, D/K must dispose of the entire tank as PCB-containing hazardous waste.

In its recent call-in letters to used oil transfer facilities, DTSC sought to impose PCB testing requirements on storage tanks prior to shipment to recycling facilities that are similar to the PCB testing on truck-to-truck transfers that it now proposes at American Oil. The conditions requiring PCB testing for each truck-to-truck transfer in this Permit are of grave concern to D/K because requiring such testing for used oil that is destined for in-state recycling is unnecessary, highly impractical and would pose tremendous delays in routine used oil transportation.

Response:

Used oil transfer facilities, such as AOC, are eligible to apply for a Standardized Permit with DTSC since used oil is not regulated as a RCRA hazardous waste under federal law. The California Health and Safety Code section 25250.1 excludes as "used oil" any oil containing more than 5 ppm of PCBs. Any used oil facility intending to receive used oil with more than 5 ppm of PCBs would not qualify for a Standardized Permit. Therefore, used oil transfer facilities must ensure that incoming shipments of used oil do not contain more than 5 ppm of

PCBs. DTSC recognizes that it would be difficult to have each incoming load of used oil tested for PCBs to ensure it does not contain greater than 5 ppm of PCBs. Instead, DTSC allows used oil facilities to test each outgoing load for PCBs at 2 ppm to account for the dilution factor.

These permit conditions are necessary to ensure that the used oil in the outgoing tanker trailer does not contain PCBs at a concentration of 2 ppm or greater. If the test result in the outgoing tanker trailer confirms that the used oil contains PCBs at a concentration of 2 ppm or greater, it would be necessary to test the representative sample taken from each tanker truck before it was unloaded into the tanker trailer to determine whether the used oil in any of the tanker trucks contained PCBs at a concentration at or above 5 ppm; and if it does, the entire tanker trailer would have to be shipped to a facility that is authorized to accept PCB-contaminated hazardous waste. These conditions are necessary to ensure that AOC is receiving the types of hazardous waste that it is authorized to receive, regardless of the final destination of the used oil.

These permit conditions are practical because testing of each incoming tanker truck is only required after the test result in the outgoing tanker trailer confirms that the used oil contains PCBs at a concentration of 2 ppm or greater.

These permit conditions also provide flexibility in that it allows AOC either to test the outgoing oil for PCBs or to instruct the receiving facility to test the tanker truck containing used oil load from AOC for PCBs. The used oil recycling facility must provide AOC with documentation that the load has been tested and does not contain greater than 2 ppm of PCBs. Used oil recycling facilities such as Industrial Services and Evergreen Oil are already testing used oil in each incoming truck before it is unloaded into the tanks.

Comment #4-2

D/K understands that the proposed testing requirement is appropriate for oil that is being transported out-of-state because the standards for used oil are so much less stringent outside of California. However, imposing blanket PCB testing requirements on each transfer facility will discourage rather than encourage compliance with PCB testing requirements. Once a transporter drives to another state, the transporter is only required to meet the federal 50 ppb standard under TSCA. Deleting the option of sending the used oil to an in-state facility without testing will encourage transporters to flaunt the California regulations and ship waste out of state. As oil prices continue to increase with no end in sight, there is even more incentive for transporters to take oil out of state. Used oil can be used in a variety of ways under the federal regulations. Used oil can be reconditioned by removing impurities, introduced into a refining process as a feedstock to produce gasoline and coke, or processed and burned for energy recovery. Thus, oil that does not meet California standards for used oil and must be managed as a hazardous waste in California may be a valuable commodity in states with less

Attachment 2

22 CCR §66264.142 (Closure Cost Estimate)

**Welcome to the online source for the
California Code of Regulations**

22 CA ADC § 66264.142

Term 

22 CCR s 66264.142

Cal. Admin. Code tit. 22, s 66264.142

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
TITLE 22. SOCIAL SECURITY
DIVISION 4.5. ENVIRONMENTAL HEALTH STANDARDS FOR THE MANAGEMENT OF HAZARDOUS
WASTE
CHAPTER 14. STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TRANSFER,
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
ARTICLE 8. FINANCIAL REQUIREMENTS

This database is current through 10/12/07, Register 2007, No. 41
s 66264.142. Cost Estimate for Closure.

(a) The owner or operator shall prepare and submit to the Department a detailed written estimate, in current dollars, of the cost of closing the facility in accordance with the requirements in sections 66264.111 through 66264.115 and applicable closure requirements in sections 66264.178, 66264.197, 66264.228, 66264.258, 66264.280, 66264.310, 66264.351, 66264.601 through 66264.603, and 66264.1102.

(1) The estimate shall be submitted in accordance with sections 66270.10 and 66270.14. The estimate shall equal the cost of final closure at the point in the facility's active life when the extent and manner of its operation would make closure the most expensive, as indicated by its closure plan (see section 66264.112(b)).

(2) The closure cost estimate shall be based on the costs to the owner or operator of hiring a third party to close the facility. A third party is a party who is neither a parent nor a subsidiary of the owner or operator. (See definition of parent corporation in section 66260.10.) The owner or operator may use costs for on-site disposal if it can be demonstrated that on-site disposal capacity will exist at all times over the life of the facility.

(3) The closure cost estimate shall not incorporate any salvage value that may be realized with the sale of hazardous wastes, or non-hazardous wastes if applicable under section 66264.113(d), facility structures or equipment, land, or other assets associated with the facility at the time of partial or final closure.

(4) The owner or operator shall not incorporate a zero cost for hazardous wastes, or non-hazardous wastes if applicable under section 66264.113(d), that might have economic value.

(b) During the active life of the facility, the owner or operator shall adjust the closure cost estimate for inflation within 60 days prior to the anniversary date of the establishment of the financial instrument(s) used to comply with section 66264.143. For owners and operators using the financial test or corporate guarantee, the closure cost estimate shall be updated for inflation within 30 days after the close of the firm's fiscal year and before submission of updated information to the Department as specified in section 66264.143(f)(3). The adjustment shall be made by recalculating the maximum costs of closure in current dollars, or by using an inflation factor derived from the most recent Implicit Price Deflator for Gross National Product published by the U.S. Department of Commerce in its Survey of Current Business, as specified in subsections (b)(1) and (2) of this section. The inflation factor is the result of dividing the latest published annual Deflator by the Deflator for the previous year.

(1) The first adjustment is made by multiplying the closure cost estimate by the inflation factor. The result is the adjusted closure cost estimate.

(2) Subsequent adjustments are made by multiplying the latest adjusted closure cost estimate by the latest inflation factor.

(c) During the active life of the facility, the owner or operator shall revise the closure cost estimate no later than 30 days after the Department has approved the request to modify the closure plan, if the change in the closure plan increases the cost of closure. The revised closure cost estimate shall be adjusted for inflation as specified in subsection (b) of this section.

(d) The owner or operator shall keep the following at the facility during the operating life of the facility: the latest closure cost estimate prepared in accordance with subsections (a) and (c) of this section and, when this estimate has been adjusted in accordance with subsection (b) of this section, the latest adjusted closure cost estimate.

Note: Authority cited: Sections 25150, 25159, 25159.5, 25179.6, 25245, 58004 and 58012, Health and Safety Code. Reference: Sections 25159, 25159.5 and 25245, Health and Safety Code; 40 CFR Section 264.142.

Attachment 3

EPC Letter on Closure Cost Estimate to Mr.
Allan Plaza (8/20/04)

August 20, 2004

SENT BY CERTIFIED MAIL
No. 7003 1010 0000 0237 6165

Mr. Allan Plaza, P.E.
Unit Chief
Department of Toxic Substances Control
1011 North Grandview Avenue
Glendale, California 91201

Subject: **Comments on DTSC's Closure Cost Estimate
Industrial Service Oil Company, Inc.
Los Angeles, California**

Dear Mr. Plaza:

On behalf of Industrial Service Oil Company, Inc. (ISOCI), EP Consultants (EPC) is pleased to provide you with our comments and a comparative review of the Department of Toxic Substances Control's (DTSC) closure cost estimate (CCE) for the ISOCI facility at 1700 South Soto Street, Los Angeles, California (Facility).

EPC has reviewed the DTSC's CCE of \$4,238,320, as detailed in your October 29, 2003 letter to ISOCI, and we have prepared a line-by-line comparison of DTSC's estimate with EPC's August 6, 2004 estimate of \$1,748,240, as included with ISOCI's *Hazardous Waste Facility Permit Application – RCRA Part A & B* for the Facility, as revised through revision 5 (Application).

EPC's CCE is based on the approach and assumptions enumerated in the Closure Plan (CP) contained in the Application. In addition, EPC's CCE reflects closure activities for Facility equipment, processes, unit descriptions, wastes, and other materials as described in the Application.

Overview and Summary

To develop the EPC CCE, actual quotations were obtained from typical service providers that may be used for potential closure activities including contractors, equipment vendors, and analytical laboratories. Copies of the quotations are provided as enclosures to this letter. Attached Table 1, *Comparison of DTSC and EPC Closure Cost Estimates as Proposed in ISOCI's Part B Application*, provides an itemized comparison of the DTSC and EPC estimates. The following table provides a summary by main element, and narrative descriptions follow:

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August 20, 2004

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Summary of DTSC and EPC Closure Cost Estimates for ISOCI Facility			
Element	DTSC Estimate	EPC Estimate	CCE Decrease
Field Activities	\$ 3,563,861	\$ 1,428,168	\$ 2,135,693
Air Monitoring (equipment)	18,751	4,432	14,319
Pressure Washers	110,473	20,041	90,432
Sampling and Analysis	461,686	219,168	242,518
Concrete Coring	10,041	4,560	5,481
Project Scientist/Engineer	27,349	36,233	- 8,884
Miscellaneous Costs	35,647	35,638	9
Mathematical Discrepancy	10,512	0	10,512
TOTALS	\$ 4,238,320	\$ 1,748,240	\$ 2,490,080

Field Activities

For decontamination, transportation, and disposal activities, EPC obtained a quotation from Environmental Recovery Service, Inc. of Signal Hill, California (Enviroserv); see Attachment 1. Enviroserv's quote was developed to implement the CP in accordance with the Facility description and processes, as described in the current Application. In accordance with the CP, EPC's CCE assumes that piping will be decontaminated and not dismantled; therefore, the cost of removing metal piping is not included in EPC's estimate. While the DTSC CCE generally assumes 100 days for closure activities, EPC's CCE is based on 30-50 days for closure activities, depending on the specific task.

EPC's estimate for the field activities element of the CCE is \$1,428,168 (= \$876,591 quoted by Enviroserv, \$313,549 in additional costs, plus \$238,028 for 20% contingency), and includes the following resources: field project manager, construction manager, environmental technician, equipment operators, equipment rental and purchase, equipment for liquid transfer from tanks and piping, decontamination services, transportation and disposal of waste materials, and incineration fees. EPC estimates that the corresponding portion of DTSC's CCE is \$3,563,861.

Air Monitoring

EPC's CCE assumes outright purchase of an organic vapor analyzer instead of rental as included in DTSC's CCE. A quote from U.S. Environmental & Laboratory

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Supplies, LLC (US E&L) is provided in Attachment 2. EPC's estimate for this component of the CCE is \$4,432 and DTSC's estimate is \$18,751.

Pressure Washers

EPC's CCE assumes outright purchase of two pressure washers instead of rental as included in DTSC's CCE. Quotes from Tyler Tool Company (Tyler Tool) and Tuff Industries are provided in Attachments 3 and 4. EPC's estimate for this component of the CCE is \$20,041 and DTSC's estimate is \$110,473.

Sampling and Analysis

EPC's CCE assumes one sample from each of 29 oil/wastewater storage tanks and 12 antifreeze/glycol storage tanks. In contrast, DTSC's CCE assumes 42 samples from oil/wastewater storage tanks and 2 samples from antifreeze/glycol storage tanks. The analytical parameters in both estimates are comparable.

For analysis of verification samples (storage tanks, pipe flushing, secondary containment) as well as soil samples, EPC's CCE is based on a quotation from Applied P & Ch Laboratories (APCL), inclusive of documentation packages. A copy of APCL's quote is provided in Attachment 5. EPC's estimate for this analytical component of the CCE is \$219,168 and DTSC's estimate is \$461,686.

Concrete Coring

EPC's concrete coring estimate is based on a Skaggs Concrete Cutting, Inc. (Skaggs Concrete) price list, as provided in Attachment 6. EPC's estimate for this component of the CCE is \$4,560 and DTSC's estimate is \$10,041.

Project Scientist/Engineer

For professional labor related to planning documents, reporting, as built drawings, permitting, and public notice activities, EPC's estimate is \$36,233 and DTSC's corresponding estimate is projected at \$27,349.

Miscellaneous Costs

For costs such as personal protective equipment, materials such as dry ice and bentonite slurry, sampling supplies, and drill rig rental, EPC's estimate is \$35,638 and DTSC's estimate is \$35,647.

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Mathematical Discrepancy

There is a mathematical discrepancy in DTSC's CCE as provided, resulting in an overstated cost by \$10,512. The "Project Cost Over Time Report" in DTSC's CCE indicates a summarized cost for the rail unit at \$485,200 exclusive of contingency. With the 20% contingency, this amount is \$582,240. However, the four "Technology Detail Report" totals provide with DTSC's CCE add up to \$476,440 before contingency. With the 20% contingency, this amount is \$571,728.

On behalf of ISOCI, EPC appreciates your attention to our comments and revisions to DTSC's CCE, and we would be pleased to meet with you to discuss the differences. If you have any questions or comments, please call me at (310) 541-5407.

Very truly yours,

E P CONSULTANTS

//original signed by//

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Enclosures: Table 1 - Comparison of DTSC and EPC Closure Cost Estimates as Proposed in ISOCI's Part B Application
Attachment 1 - Proposed Facility Closure Cost Estimate (Enviroserv)
Attachment 2 - Quote for Organic Vapor Analyzer (US E&L)
Attachment 3 - Quote for Electric Pressure Washer (Tyler Tool)
Attachment 4 - Quote for High-Pressure Washer (Tuff Industries)
Attachment 5 - Quote for Analytical Services (APCL)
Attachment 6 - Price List (Skaggs Concrete)

cc: Claudia Bohorquez, Attorney-at-Law
Pete Kotoff, ISOCI
Romeo Ricarte, EPC
John Shubin, ISOCI

Table 1

**Comparison of DTSC and EPC Closure Cost
Estimates as Proposed in ISOCI's Part B
Application**

TABLE 1. COMPARISON OF DTSC AND EPC CLOSURE COST ESTIMATES AS PROPOSED IN ISOCI's PART B APPLICATION
(see legend and notes on last page)

Task / Subtask Number	Task Description	Resource Description	Units	DTSC (10/29/03 letter from A. Plaza)			EPC (8/6/04, Part B revision 5)			Notes
				Quantity	Unit Cost	Extension	Quantity	Unit Cost	Extension	
TASK A: OIL/WASTEWATER STORAGE TANKS										
Subtask A.1 - Tank Decontamination										
<i>1.1 Labor</i>										
1.1.1	Wipe contaminated surfaces	Environmental Technician	hour	629	\$35.000	\$ 22,015	320	\$ 35.000	\$ 11,200	[1]
1.1.2	Decontaminate light equipment	Environmental Technician	hour	800	\$39.148	\$ 31,319	400	\$ 39.140	\$ 15,656	[1]
1.1.3	High-pressure wash decontamination, 31,932 SF	Environmental Technician	hour	5,164	\$35.000	\$ 180,740	800	\$ 35.000	\$ 28,000	[1]
1.1.4	Dry ice purge of tanks	Environmental Technician	hour	1,705	\$35.000	\$ 59,675	168	\$ 35.000	\$ 5,880	[1]
1.1.5	Project Management	Project Manager	hour	562	\$65.010	\$ 36,536	400	\$ 65.000	\$ 26,000	[1]
1.1.6	Planning Documents	Project Scientist/Engineer	hour	25	\$55.534	\$ 1,388	25	\$ 55.000	\$ 1,375	
1.1.7	Reporting	Project Scientist/Engineer	hour	25	\$54.804	\$ 1,370	25	\$ 55.000	\$ 1,375	
<i>1.2 Material</i>										
1.2.1	Personal protective equipment	Level "C" Respirator Cartridges	each	200	\$15.600	\$ 3,120	200	\$ 15.600	\$ 3,120	
1.2.2	Personal protective equipment	Disposable Boot Covers (Tyvek)	pair	400	\$1.450	\$ 580	400	\$ 1.450	\$ 580	
1.2.3	Personal protective equipment	Disposable Gloves (Latex)	pair	800	\$0.264	\$ 211	800	\$ 0.260	\$ 208	
1.2.4	Personal protective equipment	Disposable Coveralls (Latex)	each	400	\$5.623	\$ 2,249	400	\$ 5.620	\$ 2,248	
1.2.5	Personal protective equipment	Face Shields (Reusable)	each	2	\$26.330	\$ 53	2	\$ 26.330	\$ 53	
1.2.6	Personal protective equipment	Disposable Ear Plugs	pair	400	\$0.152	\$ 61	400	\$ 0.150	\$ 60	
1.2.7	Tank content sampling	Glass Coliwasas, disposable, 200ml case of 12	each	2	\$99.915	\$ 200	2	\$ 99.920	\$ 200	
1.2.8	Tank purging	Tank Purging with Dry Ice	KGAL	761	\$0.030	\$ 23	761	\$ 0.030	\$ 23	
1.2.9	Operation of pressure washer	Operation of Pressure washer, including Water, Soap, Electricity & Labor	hours	800	\$8.593	\$ 6,874	240	\$ 8.590	\$ 2,062	[1]
<i>1.3 Equipment</i>										
1.3.1	Vapor monitoring	Hand-held organic vapor monitor	each	100	\$141.940	\$ 14,194	1	\$ 3,693.375	\$ 3,693	[2]
1.3.2	Pressure washing	Pressure Washer	each	4	\$1,353.698	\$ 5,415	2	\$ 546.868	\$ 1,094	[3]
1.3.3	Tank purging	Dry Ice	KGAL	761	\$2.589	\$ 1,970	761	\$ 2.570	\$ 1,956	

TABLE 1. COMPARISON OF DTSC AND EPC CLOSURE COST ESTIMATES AS PROPOSED IN ISOCI's PART B APPLICATION
(see legend and notes on last page)

Task / Subtask Number	Task Description	Resource Description	Units	DTSC (10/29/03 letter from A. Plaza)			EPC (8/6/04, Part B revision 5)			Notes
				Quantity	Unit Cost	Extension	Quantity	Unit Cost	Extension	
1.3.4	Wipe sampling	Wipes and supplies	day	76	\$15.119	\$ 1,149	76	\$ 14.250	\$ 1,083	
1.3.5	Decontamination of tank	High-pressure Wash, 40 SF/Hour	each	31,932	\$1.796	\$ 57,335	2	\$ 7,803.682	\$ 15,607	[4]
<i>1.4 Subcontractor - Analytical</i>										
1.4.1	Water analysis	TAL Metals (EPA 6010/7000)	each	42	\$401.141	\$ 16,848	29	\$ 100.000	\$ 2,900	[5]
1.4.2	Water analysis	Purgeable Hydrocarbons (EPA 601)	each	42	\$137.516	\$ 5,776	29	\$ 90.000	\$ 2,610	[5]
1.4.3	Water analysis	Purgeable Aromatics (EPA 602)	each	42	\$102.910	\$ 4,322	29	\$ 90.000	\$ 2,610	[5]
1.4.4	Water analysis	Chlorinated Hydrocarbons (EPA 625)	each	42	\$238.509	\$ 10,017	29	\$ 170.000	\$ 4,930	[5]
1.4.5	Water analysis	Organochlorine Pesticides & PCBs (EPA 617)	each	42	\$216.032	\$ 9,073	29	\$ 140.000	\$ 4,060	[5]
1.4.6	Water analysis	Total Petroleum Hydrocarbons (SW8015B)	each	42	\$94.634	\$ 3,975	29	\$ 78.000	\$ 2,262	[5]
1.4.7	QA/QC documentation	Data & Benchwork	each	42	\$141.252	\$ 5,933	29	\$ -	\$ -	[5]
Subtask A.2 - Used Oil Transportation & Disposal										
<i>2.1 Labor</i>										
2.1.1	Decontaminate light equipment	Environmental Technician	hour	72	\$35.011	\$ 2,521	72	\$ 35.000	\$ 2,520	
2.1.2	Liquid loading into tank truck	Environmental Technician	hour	2,398	\$35.000	\$ 83,930	300	\$ 35.000	\$ 10,500	[1]
2.1.3	Project Management	Project Manager	hour	562	\$65.010	\$ 36,536	80	\$ 65.000	\$ 5,200	[1]
2.1.4	Planning Documents	Project Scientist/Engineer	hour	25	\$55.534	\$ 1,388	25	\$ 55.000	\$ 1,375	
2.1.5	Reporting	Project Scientist/Engineer	hour	25	\$54.804	\$ 1,370	25	\$ 55.000	\$ 1,375	
<i>2.2 Equipment</i>										
2.2.1	Liquid loading into bulk tanker	Equipment rental per truckload	load	137	\$141.092	\$ 19,330	See Subtask 2.2.2			
2.2.2	Liquid loading into bulk tanker	Equipment rental per day	day	See Subtask 2.2.1			18	\$ 500.000	\$ 9,000	[1]
<i>2.3 Subcontractor - Analytical</i>										
2.3.1	Waste analysis	Profiling	each	21	\$560.818	\$ 11,777	-	\$ -	\$ -	[6]
<i>2.4 Subcontractor - Transportation & Disposal</i>										
2.4.1	Transportation	Truck Loads	each	137	\$934.696	\$ 128,053	See Subtask 2.4.4 & 2.4.6			
2.4.2	Decontamination	Truck Loads	each	137	\$193.385	\$ 26,494	See Subtask 2.4.4 & 2.4.6			

TABLE 1. COMPARISON OF DTSC AND EPC CLOSURE COST ESTIMATES AS PROPOSED IN ISOCI's PART B APPLICATION
(see legend and notes on last page)

Task / Subtask Number	Task Description	Resource Description	Units	DTSC (10/29/03 letter from A. Plaza)			EPC (8/6/04, Part B revision 5)			Notes
				Quantity	Unit Cost	Extension	Quantity	Unit Cost	Extension	
2.4.3	Disposal	Incineration fee	gals	684,686	\$0.579	\$ 396,645	See Subtask 2.4.4 & 2.4.6			
2.4.4	Transportation	Used Oil Product	gals	See Subtask 2.4.1 & 2.4.3			430,000	\$ 0.060	\$ 25,800	[1]
2.4.5	Transportation	Oily Wastewater	gals	See Subtask 2.4.1 & 2.4.3			470,000	\$ 0.058	\$ 27,260	[1]
2.4.6	Disposal	Used Oil Product	gals	See Subtask 2.4.1 & 2.4.3			430,000	\$ 0.050	\$ 21,500	[1]
2.4.7	Disposal	Oily Wastewater	gals	See Subtask 2.4.1 & 2.4.3			470,000	\$ 0.450	\$ 211,500	[1]
Subtask A.3 - Sludge Transportation & Disposal										
<i>3.1 Labor</i>										
3.1.1	Decontaminate light equipment	Environmental Technician	hour	6	\$35.000	\$ 210	6	\$ 35.000	\$ 210	
3.1.2	Liquid loading into tank truck	Environmental Technician	hour	280	\$35.000	\$ 9,800	80	\$ 35.000	\$ 2,800	[1]
3.1.3	Project Management	Project Manager	hour	562	\$65.010	\$ 36,536	20	\$ 65.000	\$ 1,300	[1]
3.1.4	Planning Documents	Project Scientist/Engineer	hour	25	\$55.534	\$ 1,388	25	\$ 55.000	\$ 1,375	
3.1.5	Reporting	Project Scientist/Engineer	hour	25	\$54.804	\$ 1,370	25	\$ 55.000	\$ 1,375	
<i>3.2 Equipment</i>										
3.2.1	Liquid loading into bulk tanker	Equipment rental per truckload	each	16	\$141.219	\$ 2,260	16	\$ 141.080	\$ 2,257	
<i>3.3 Subcontractor - Analytical</i>										
3.3.1	Waste analysis	Profiling	each	2	\$560.820	\$ 1,122	2	\$ 560.820	\$ 1,122	
<i>3.4 Subcontractor - Transportation & Disposal</i>										
3.4.1	Transportation	RCRA Sludge, Truck Loads (600 miles each)	miles	9,600	\$2.849	\$ 27,352	See Subtask 3.4.4 & 3.4.5			
3.4.2	Decontamination	RCRA Sludge, Truck Loads	each	16	\$193.386	\$ 3,094	16	\$193.386	\$ 3,094	
3.4.3	Disposal	RCRA Sludge Incineration fee	CY	304	\$1,668.409	\$ 507,196	See Subtask 3.4.4 & 3.4.5			
3.4.4	Transportation	RCRA Sludge, Truck Loads	Tons	See Subtask 3.4.1 & 3.4.3			450	\$ 50.000	\$ 22,500	[1]
3.4.5	Disposal	RCRA Sludge Incineration fee	Tons	See Subtask 3.4.1 & 3.4.3			450	\$ 150.000	\$ 67,500	[1]
Subtask A.4 - Rinseate Wastewater Transportation & Disposal										
<i>4.1 Labor</i>										
4.1.1	Decontaminate light equipment	Environmental Technician	hour	6	\$35.010	\$ 210	6	\$ 35.000	\$ 210	
4.1.2	Liquid loading into tank truck	Environmental Technician	hour	2,517	\$35.000	\$ 88,095	100	\$ 35.000	\$ 3,500	[1]
4.1.3	Project Management	Project Manager	hour	562	\$65.010	\$ 36,536	20	\$ 65.000	\$ 1,300	[1]
4.1.4	Planning Documents	Project Scientist/Engineer	hour	25	\$55.534	\$ 1,388	25	\$ 55.000	\$ 1,375	

TABLE 1. COMPARISON OF DTSC AND EPC CLOSURE COST ESTIMATES AS PROPOSED IN ISOCI's PART B APPLICATION
(see legend and notes on last page)

Task / Subtask Number	Task Description	Resource Description	Units	DTSC (10/29/03 letter from A. Plaza)			EPC (8/6/04, Part B revision 5)			Notes
				Quantity	Unit Cost	Extension	Quantity	Unit Cost	Extension	
4.1.5	Reporting	Project Scientist/Engineer	hour	25	\$54,804	\$ 1,370	25	\$ 55,000	\$ 1,375	
4.2 Equipment										
4.2.1	Liquid loading into bulk tanker	Equipment rental per truckload	each	144	\$141,949	\$ 20,441	See Subtask 4.2.2			
4.2.2	Liquid loading into bulk tanker	Equipment rental per day	day	See Subtask 4.2.1			5	\$ 500,000	\$ 2,500	[1]
4.3 Subcontractor - Analytical										
4.3.1	Waste analysis	Profiling	each	15	\$560,817	\$ 8,412	15	\$ 560,820	\$ 8,412	
4.4 Subcontractor -Transportation & Disposal										
4.4.1	Transportation	Truck Loads	each	144	\$934,696	\$ 134,596	30	\$ 934,700	\$ 28,041	[1]
4.4.2	Decontamination	Truck Loads	each	144	\$193,385	\$ 27,847	30	\$ 193,390	\$ 5,802	[1]
4.4.3	Disposal	Incineration fee	gals	419,115	\$0.579	\$ 242,797	154,350	\$ 0.580	\$ 89,523	[1]
Subtask A.4 - Confirmation Soil Sampling										
5.1 Labor										
5.1.1	Decontaminate light equipment	Environmental Technician	hour	72	\$34,798	\$ 2,505	9	\$ 35,000	\$ 315	
5.1.2	Project Management	Project Manager	hour	562	\$65,010	\$ 36,536	32	\$ 65,000	\$ 2,080	[1]
5.1.3	Planning Documents	Project Scientist/Engineer	hour	25	\$55,534	\$ 1,388	25	\$ 55,000	\$ 1,375	
5.1.4	Reporting	Project Scientist/Engineer	hour	25	\$54,804	\$ 1,370	25	\$ 55,000	\$ 1,375	
5.2 Equipment										
5.2.1	Vapor monitoring	Hand-held organic vapor monitor	day	8	\$141,944	\$ 1,136	See Subtask 1.3.1			[2]
5.3 Material										
5.3.1	Personal protective equipment	Hard Hat	each	2	\$10,380	\$ 21	2	\$ 10,380	\$ 21	
5.3.2	Personal protective equipment	Disposable Gloves	pair	64	\$0.264	\$ 17	64	\$ 0.260	\$ 17	
5.3.3	Personal protective equipment	Disposable Coverall (Tyvek)	each	32	\$5,623	\$ 180	32	\$ 5,620	\$ 180	
5.3.4	Personal protective equipment	Disposable Ear Plugs	pair	64	\$0.152	\$ 10	64	\$ 0.150	\$ 10	
5.3.5	Personal protective equipment	Safety Goggles	each	2	\$8,250	\$ 17	2	\$ 8,250	\$ 17	
5.3.6	Personal protective equipment	Disposable Materials for Sample	each	177	\$9,889	\$ 1,750	177	\$ 9,890	\$ 1,751	
5.4 Subcontractor -Drilling										
5.4.1	Drilling of soil borings	CPT Drill Rig	day	4	\$3,323,570	\$ 13,294	4	\$ 3,323,570	\$ 13,294	
5.4.2	Grout holes	Bentonite Slurry	feet	590	\$2,077	\$ 1,226	590	\$ 2,080	\$ 1,227	

TABLE 1. COMPARISON OF DTSC AND EPC CLOSURE COST ESTIMATES AS PROPOSED IN ISOCI'S PART B APPLICATION
(see legend and notes on last page)

Task / Subtask Number	Task Description	Resource Description	Units	DTSC (10/29/03 letter from A. Plaza)			EPC (8/6/04, Part B revision 5)			Notes
				Quantity	Unit Cost	Extension	Quantity	Unit Cost	Extension	
<i>5.5 Subcontractor - Analytical</i>										
5.5.1	Soil analysis	TAL Metals (EPA 6010/7000)	each	177	\$401.141	\$ 71,002	177	\$ 100.000	\$ 17,700	[7]
5.5.2	Soil analysis	Volatile Organic Analysis (EPA 8260B)	each	177	\$253.884	\$ 44,937	177	\$ 90.000	\$ 15,930	[7]
5.5.3	Soil analysis	Semi Volatile Organics (EPA 8270C)	each	177	\$373.902	\$ 66,181	177	\$ 170.000	\$ 30,090	[7]
5.5.4	Soil analysis	Organochlorine Pesticides & PCBs (EPA 80818/8082)	each	177	\$212.916	\$ 37,686	177	\$ 140.000	\$ 24,780	[7]
5.5.5	Soil analysis	Total Petroleum Hydrocarbons (SW8015B)	each	177	\$81.866	\$ 14,490	177	\$ 78.000	\$ 13,806	[7]
TASK B: ANTIFREEZE/GLYCOL STORAGE TANKS										
<i>Subtask B.1 - Used Antifreeze Tank Decontamination</i>										
<i>6.1 Labor</i>										
6.1.1	Project Management	Project Manager	hour	8	\$71.348	\$ 571	8	\$ 65.000	\$ 520	
6.1.2	Planning Documents	Project Scientist/Engineer	hour	8	\$57.079	\$ 457	8	\$ 55.000	\$ 440	
6.1.3	Construction Oversight	Construction Supervisor	hour	6	\$61.835	\$ 371	6	\$ 55.000	\$ 330	
6.1.4	Reporting	Project Scientist/Engineer	hour	2	\$42.809	\$ 86	2	\$ 55.000	\$ 110	
6.1.5	As-Built Drawings	Project Scientist/Engineer	hour	2	\$42.809	\$ 86	2	\$ 55.000	\$ 110	
6.1.6	Public Notice	Project Scientist/Engineer	hour	1	\$28.540	\$ 29	1	\$ 28.540	\$ 29	
6.1.7	Permitting	Project Scientist/Engineer	hour	10	\$57.079	\$ 571	10	\$ 55.000	\$ 550	
6.1.8	Decontaminate light equipment	Environmental Technician	hour	19	\$35.236	\$ 669	19	\$ 35.000	\$ 665	
6.1.9	Decontaminate tank	Environmental Technician	hour	112	\$35.000	\$ 3,920	112	\$ 35.000	\$ 3,920	
6.1.10	Tank purging	Environmental Technician	hour	21	\$35.000	\$ 735	21	\$ 35.000	\$ 735	
<i>6.2 Material</i>										
6.2.1	Personal protective equipment	Level "C" Breathing Apparatus (Half-face Respirator)	each	2	\$41.800	\$ 84	2	\$ 41.800	\$ 84	
6.2.2	Personal protective equipment	Level "C" Respirator Cartridges	each	4	\$16.290	\$ 65	4	\$ 16.290	\$ 65	
6.2.3	Personal protective equipment	Disposable Boot Covers (Tyvek)	pair	8	\$1.515	\$ 12	8	\$ 1.510	\$ 12	
6.2.4	Personal protective equipment	Disposable Gloves (Latex)	pair	16	\$0.276	\$ 4	16	\$ 0.280	\$ 4	
6.2.5	Personal protective equipment	Disposable Coveralls (Tyvek)	each	8	\$5.870	\$ 47	8	\$ 5.870	\$ 47	
6.2.6	Personal protective equipment	Face Shields (Reusable)	each	2	\$25.780	\$ 52	2	\$ 25.780	\$ 52	

TABLE 1. COMPARISON OF DTSC AND EPC CLOSURE COST ESTIMATES AS PROPOSED IN ISOCI's PART B APPLICATION
(see legend and notes on last page)

Task / Subtask Number	Task Description	Resource Description	Units	DTSC (10/29/03 letter from A. Plaza)			EPC (8/6/04, Part B revision 5)			Notes
				Quantity	Unit Cost	Extension	Quantity	Unit Cost	Extension	
6.2.7	Personal protective equipment	Disposable Ear Plugs	pair	16	\$0.158	\$ 3	16	\$ 0.160	\$ 3	
6.2.8	Sampling	Glass Coliwases, disposable, 200ml case of 12	each	1	\$104.340	\$ 104	1	\$ 104.340	\$ 104	
6.2.9	Tank purging	Tank Purging with Dry Ice	KGAL	7	\$0.030	\$ 0	84	\$ 0.030	\$ 3	
6.2.10	Personal protective equipment	Hard Hats	each	2	\$10.840	\$ 22	2	\$ 10.840	\$ 22	
6.2.11	Sampling	Clear Wide Mouth Vial with Septa, 250 ml, Case of 24	each	1	\$74.720	\$ 75	1	\$ 74.720	\$ 75	
6.2.12	Sampling	Ice Chest	each	2	\$47.120	\$ 94	2	\$ 47.120	\$ 94	
6.2.13	Sampling	Blue Ice Soft Packs	each	2	\$2.170	\$ 4	2	\$ 2.170	\$ 4	
6.3 Equipment										
6.3.1	Vapor monitoring	Hand-held organic vapor monitor	day	2	\$148.230	\$ 296	See Subtask 1.3.1			[2]
6.3.2	Pressure washing	Pressure Washer	Month	1	\$1,348.010	\$ 1,348	See Subtask 1.3.2			[3]
6.3.3	Tank purging	Dry Ice	KGAL	7	\$3.173	\$ 22	84	\$ 19.320	\$ 1,623	[8]
6.3.4	Decontamination of tank	High-pressure Wash, 40 SF/Hour	SF	653	\$2.165	\$ 1,414	See Subtask 1.3.5			[4]
6.4 Subcontractor - Analytical										
6.4.1	Water analysis	Tank Decontamination Samples	each	2	\$310.220	\$ 620	12	\$ 100.000	\$ 1,200	[9]
6.4.2	Water analysis	TAL Metals (EPA 6010/7000)	each	2	\$418.890	\$ 838	12	\$ 90.000	\$ 1,080	[9]
6.4.3	Water analysis	Purgeable Halocarbons (EPA 601)	each	2	\$143.600	\$ 287	12	\$ 90.000	\$ 1,080	[9]
6.4.4	Water analysis	Purgeable Aromatics (EPA 602)	each	2	\$107.460	\$ 215	12	\$ 90.000	\$ 1,080	[9]
6.4.5	Water analysis	Chlorinated Hydrocarbons (EPA 625)	each	2	\$249.060	\$ 498	12	\$ 170.000	\$ 2,040	[9]
6.4.6	Water analysis	Organochlorine Pesticides & PCBs (EPA 617)	each	2	\$225.590	\$ 451	12	\$ 140.000	\$ 1,680	[9]
6.4.7	Water analysis	Total Petroleum Hydrocarbons (SW8015B)	each	2	\$98.820	\$ 198	12	\$ 78.000	\$ 936	[9]
6.4.8	QA/QC documentation	Data & Benchwork	each	1	\$147.500	\$ 148	12	\$ -	\$ -	[9]
Subtask B.2 - Used Antifreeze Transportation & Disposal										
6.5 Labor										
6.5.1	Project management	Project Manager	hour	8	\$71.348	\$ 571	8	\$ 65.000	\$ 520	
6.5.2	Planning documents	Project Scientist / Engineer	hour	8	\$57.079	\$ 457	8	\$ 55.000	\$ 440	
6.5.3	Construction oversight	Construction Supervisor	hour	6	\$61.835	\$ 371	6	\$ 55.000	\$ 330	

TABLE 1. COMPARISON OF DTSC AND EPC CLOSURE COST ESTIMATES AS PROPOSED IN ISOCI's PART B APPLICATION
(see legend and notes on last page)

Task / Subtask Number	Task Description	Resource Description	Units	DTSC (10/29/03 letter from A. Plaza)			EPC (8/6/04, Part B revision 5)			Notes
				Quantity	Unit Cost	Extension	Quantity	Unit Cost	Extension	
6.5.4	Reporting	Project Scientist / Engineer	hour	2	\$42.809	\$ 86	2	\$ 55.000	\$ 110	
6.5.5	As-built drawings	Project Scientist / Engineer	hour	2	\$42.809	\$ 86	2	\$ 55.000	\$ 110	
6.5.6	Public notice	Project Scientist / Engineer	hour	1	\$28.540	\$ 29	-	\$ 28.540	\$ -	
6.5.7	Permitting	Project Scientist / Engineer	hour	10	\$57.079	\$ 571	-	\$ 55.000	\$ -	
6.5.8	Decontaminate light equipment	Environmental Technician	hour	6	\$37.422	\$ 225	6	\$ 35.000	\$ 210	
6.5.9	Liquid loading in to tank truck	Environmental Technician	hour	18	\$90.358	\$ 1,626	18	\$ 90.358	\$ 1,626	
6.6 Subcontractor - Analytical										
6.6.1	Water analysis	Profiling	each	1	\$585.630	\$ 586	1	\$ 585.630	\$ 586	
6.7 Subcontractor -Transportation & Disposal										
6.7.1	Transportation	Tanker Trailer Transport Hazardous Waste Minimum Charge	each	2	\$976.050	\$ 1,952	See Subtask 6.7.4 & 6.7.5			
6.7.2	Decontamination	Truck Washout/Decontamination	each	2	\$201.940	\$ 404	See Subtask 6.7.4 & 6.7.5			
6.7.3	Disposal	RCRA Water Incineration fee	gals	5,529	\$0.605	\$ 3,345	See Subtask 6.7.4 & 6.7.5			
6.7.4	Transportation of antifreeze, glycol	Tanker Trailer Transport Hazardous Waste Minimum Charge	gals	See Subtask 6.7.1 & 6.7.3			43,957	\$ 0.070	\$ 3,077	[1]
6.7.5	Transportation of fuel blend product	Tanker Trailer Transport Hazardous Waste Minimum Charge	gals	See Subtask 6.7.1 & 6.7.3			111,325	\$ 0.600	\$ 66,795	[1]
6.7.6	Disposal of antifreeze, glycol	Disposal fee	gals	See Subtask 6.7.1 & 6.7.3			43,957	\$ 0.100	\$ 4,396	[1]
6.7.7	Disposal of fuel blend	Disposal fee of RCRA Waste	gals	See Subtask 6.7.1 & 6.7.3			111,325	\$ 0.350	\$ 38,964	[1]
6.7.8	Transportation	Drums content from Containment Management Area #7as RCRA Waste	gals	See Subtask 6.7.1 & 6.7.3			35,200	\$ 0.600	\$ 21,120	[1]
6.7.9	Disposal	RCRA Waste Solid fee	gals	See Subtask 6.7.1 & 6.7.3			35,200	\$ 0.350	\$ 12,320	[1]
Subtask B.3 - Sludge Transportation & Disposal										
6.8 Labor										
6.8.1	Decontaminate light equipment	Environmental Technician	hour	6	\$37.422	\$ 225	6	\$ 35.000	\$ 210	
6.8.2	Liquid loading in to tank truck	Environmental Technician	hour	18	\$36.378	\$ 655	18	\$ 36.378	\$ 655	
6.8.3	Project management	Project Manager	hour	8	\$71.348	\$ 571	8	\$ 65.000	\$ 520	
6.8.4	Planning documents	Project Scientist / Engineer	hour	8	\$57.079	\$ 457	8	\$ 55.000	\$ 440	
6.8.5	Construction oversight	Construction Supervisor	hour	6	\$61.835	\$ 371	6	\$ 55.000	\$ 330	
6.8.6	Reporting	Project Scientist / Engineer	hour	2	\$42.809	\$ 86	2	\$ 55.000	\$ 110	

TABLE 1. COMPARISON OF DTSC AND EPC CLOSURE COST ESTIMATES AS PROPOSED IN ISOCI's PART B APPLICATION
(see legend and notes on last page)

Task / Subtask Number	Task Description	Resource Description	Units	DTSC (10/29/03 letter from A. Plaza)			EPC (8/6/04, Part B revision 5)			Notes
				Quantity	Unit Cost	Extension	Quantity	Unit Cost	Extension	
6.8.7	As-built drawings	Project Scientist / Engineer	hour	2	\$42.809	\$ 86	2	\$ 55.000	\$ 110	
6.8.8	Public notice	Project Scientist / Engineer	hour	1	\$28.540	\$ 29	1	\$ 28.540	\$ 29	
6.8.9	Permitting	Project Scientist / Engineer	hour	10	\$57.079	\$ 571	10	\$ 55.000	\$ 550	
<i>6.9 Equipment</i>										
6.9.1	Liquid loading into bulk tanker	Equipment rental per truckload	each	1	\$158.410	\$ 158	1	\$ 158.410	\$ 158	
<i>6.10 Subcontractor - Analytical</i>										
6.10.1	Water analysis	Profiling	each	1	\$585.630	\$ 586	1	\$ 585.630	\$ 586	
<i>6.11 Subcontractor - Transportation & Disposal</i>										
6.11.1	Transportation	RCRA Sludge, Truck Loads (600 miles each)	Miles	600	\$2.975	\$ 1,785	See Subtask 6.11.4 to 6.11.9			
6.11.2	Decontamination	RCRA Sludge, Truck Loads	each	1	\$201.940	\$ 202	See Subtask 6.11.4 to 6.11.9			
6.11.3	Disposal	RCRA Sludge Incineration fee	CY	4	\$1,742.230	\$ 7,143	See Subtask 6.11.4 to 6.11.9			
6.11.4	Transportation	RCRA Sludge, Truck Loads	load	See Subtask 6.11.1 & 6.11.3			1	\$ 1,200.000	\$ 1,200	[1]
6.11.5	Disposal	RCRA Sludge Incineration fee	Tons	See Subtask 6.11.1 & 6.11.3			10	\$ 145.000	\$ 1,450	[1]
6.11.6	Transportation	CMA#1 Drums RCRA Sludge content	load	See Subtask 6.11.1 & 6.11.3			6	\$ 1,200.000	\$ 7,200	[1]
6.11.7	Disposal	RCRA Sludge Incineration fee	Tons	See Subtask 6.11.1 & 6.11.3			143	\$ 145.000	\$ 20,735	[1]
6.11.8	Transportation	Empty Drums as RCRA solid	load	See Subtask 6.11.1 & 6.11.3			1	\$ 1,200.000	\$ 1,200	[1]
6.11.9	Disposal	Disposal fee as RCRA solid	each	See Subtask 6.11.1 & 6.11.3			840	\$ 10.000	\$ 8,400	[1]
Subtask B.4 - Rinseate Wastewater Transportation & Disposal										
<i>6.12 Labor</i>										
6.12.1	Project management	Project Manager	hour	8	\$71.348	\$ 571	8	\$ 65.000	\$ 520	
6.12.2	Planning documents	Project Scientist / Engineer	hour	8	\$57.079	\$ 457	8	\$ 55.000	\$ 440	
6.12.3	Construction oversight	Construction Supervisor	hour	6	\$61.835	\$ 371	6	\$ 55.000	\$ 330	
6.12.4	Reporting	Project Scientist / Engineer	hour	2	\$42.809	\$ 86	2	\$ 55.000	\$ 110	
6.12.5	As-built drawings	Project Scientist / Engineer	hour	2	\$42.809	\$ 86	2	\$ 55.000	\$ 110	
6.12.6	Public notice	Project Scientist / Engineer	hour	1	\$28.540	\$ 29	1	\$ 28.540	\$ 29	
6.12.7	Permitting	Project Scientist / Engineer	hour	10	\$57.079	\$ 571	10	\$ 55.000	\$ 550	
6.12.8	Decontaminate light equipment	Environmental Technician	hour	6	\$37.422	\$ 225	6	\$ 35.000	\$ 210	
6.12.9	Liquid loading in to tank truck	Environmental Technician	hour	18	\$35.000	\$ 630	18	\$ 35.000	\$ 630	

TABLE 1. COMPARISON OF DTSC AND EPC CLOSURE COST ESTIMATES AS PROPOSED IN ISOCI's PART B APPLICATION
(see legend and notes on last page)

Task / Subtask Number	Task Description	Resource Description	Units	DTSC (10/29/03 letter from A. Plaza)			EPC (8/6/04, Part B revision 5)			Notes
				Quantity	Unit Cost	Extension	Quantity	Unit Cost	Extension	
<i>6.13 Equipment</i>										
6.13.1	Liquid loading into bulk tanker	Equipment rental per truckload	each	1	\$183.220	\$ 183	1	\$ 158.410	\$ 158	
<i>6.14 Subcontractor - Analytical</i>										
6.14.1	Waste analysis	Profiling	each	1	\$585.630	\$ 586	1	\$ 585.630	\$ 586	
<i>6.15 Subcontractor -Transportation & Disposal</i>										
6.15.1	Transportation	Tanker Trailer Hazardous Waste Minimum Charge	each	1	\$976.050	\$ 976	1	\$ 976.050	\$ 976	
6.15.2	Decontamination	Hazardous Waste, Truck Loads	each	1	\$201.940	\$ 202	1	\$ 201.940	\$ 202	
6.15.3	Disposal	RCRA Bulk Liquids Incineration Fee	gals	14,695	\$0.605	\$ 8,890	12,000	\$ 0.600	\$ 7,200	[1]
TASK C: SECONDARY CONTAINMENT SURFACE DECONTAMINATION & PIPE FLUSHING										
<i>Subtask C.1 - Surface Decontamination</i>										
<i>6.16 Labor</i>										
6.16.1	Concrete coring	Environmental Technician	hour	158	\$35.000	\$ 5,530	See Subtask 6.20.2			[10]
6.16.2	Decontaminate surface	Environmental Technician	hour	2,131	\$35.000	\$ 74,585	350	\$ 35.000	\$ 12,250	[1]
6.16.4	Project management	Project Manager	hour	122	\$65.000	\$ 7,930	80	\$ 65.000	\$ 5,200	[1]
6.16.5	Planning documents	Project Scientist / Engineer	hour	5	\$55.000	\$ 275	5	\$ 55.000	\$ 275	
6.16.6	Reporting	Project Scientist / Engineer	hour	5	\$55.000	\$ 275	5	\$ 55.000	\$ 275	
<i>6.17 Material</i>										
6.17.1	Personal protective equipment	Level "C" Breathing Apparatus (Half-face Respirator)	each	2	\$40.030	\$ 80	2	\$ 40.030	\$ 80	
6.17.2	Personal protective equipment	Level "C" Respirator Cartridges	each	82	\$15.600	\$ 1,279	82	\$ 15.600	\$ 1,279	
6.17.3	Personal protective equipment	Disposable Boot Covers (Tyvek)	pair	164	\$1.450	\$ 238	164	\$ 1.450	\$ 238	
6.17.4	Personal protective equipment	Disposable Gloves (Latex)	pair	328	\$0.260	\$ 85	328	\$ 0.260	\$ 85	
6.17.5	Personal protective equipment	Disposable Coveralls (Latex)	each	164	\$5.620	\$ 922	164	\$ 5.620	\$ 922	
6.17.6	Personal protective equipment	Face Shields (Reusable)	each	2	\$24.690	\$ 49	2	\$ 24.690	\$ 49	
6.17.7	Personal protective equipment	Disposable Ear Plugs	pair	328	\$0.150	\$ 49	328	\$ 0.150	\$ 49	
6.17.8	Sampling	Glass Coliwassas, disposable, 200ml case of 4	each	1	\$114.100	\$ 114	1	\$ 114.100	\$ 114	
6.17.9	Personal protective equipment	Hard Hat	each	2	\$10.380	\$ 21	2	\$ 10.380	\$ 21	

TABLE 1. COMPARISON OF DTSC AND EPC CLOSURE COST ESTIMATES AS PROPOSED IN ISOCI's PART B APPLICATION
(see legend and notes on last page)

Task / Subtask Number	Task Description	Resource Description	Units	DTSC (10/29/03 letter from A. Plaza)			EPC (8/6/04, Part B revision 5)			Notes
				Quantity	Unit Cost	Extension	Quantity	Unit Cost	Extension	
<i>6.18 Equipment</i>										
6.18.1	Pressure washing	Pressure Washer Rental	Month	2	\$1,353.700	\$ 2,707	See Subtask 1.3.2			[3] [4]
6.18.2	Decontamination of Surface	Pressure Washing, 105 SF/hour	SF	34,060	\$0.700	\$ 23,842	See Subtask 1.3.5			[3] [4]
6.18.3	Concrete coring	Coring Machine	each	4	\$1,852.000	\$ 7,408	See Subtask 6.20.2			[10]
<i>6.19 Subcontractor - Analytical</i>										
6.19.1	Water analysis	TAL Metals (EPA 6010/7000)	each	4	\$401.140	\$ 1,605	4	\$ 100.000	\$ 400	[11]
6.19.2	Water analysis	Purgeable Halocarbons (EPA 601)	each	5	\$137.520	\$ 688	5	\$ 90.000	\$ 450	[11]
6.19.3	Water analysis	Purgeable Aromatics (EPA 602)	each	5	\$102.910	\$ 515	5	\$ 90.000	\$ 450	[11]
6.19.4	Water analysis	Organochlorine Pesticides & PCBs (EPA 617)	each	5	\$216.030	\$ 1,080	5	\$ 140.000	\$ 700	[11]
6.19.5	Water analysis	Total Petroleum Hydrocarbons (SW8015B)	each	5	\$94.630	\$ 473	5	\$ 78.000	\$ 390	[11]
<i>6.20 Subcontractor</i>										
6.20.1	Concrete coring	Concrete Coring Machine with supplies	day	4	\$239.800	\$ 959	See Subtask 6.20.2			
6.20.2	Concrete coring	Concrete Coring Machine with supplies	day	See Subtask 6.20.1			4	\$ 950.000	\$ 3,800	[10]
Subtask C.2 - Pipe Flushing										
<i>6.21 Labor</i>										
6.21.1	Remove metal pipe to 4"	Environmental Technician	hour	819	\$35.000	\$ 28,665	-	\$ 35.000	\$ -	[12]
6.21.2	Drain/flush pipe	Environmental Technician	hour	154	\$35.000	\$ 5,390	154	\$ 35.000	\$ 5,390	
6.21.3	Decontaminate heavy equipment	Environmental Technician	hour	21	\$35.000	\$ 735	21	\$ 35.000	\$ 735	
6.21.4	Project management	Project Manager	hour	122	\$65.000	\$ 7,930	122	\$ 65.000	\$ 7,930	
6.21.5	Planning documents	Project Scientist / Engineer	hour	5	\$55.000	\$ 275	5	\$ 55.000	\$ 275	
6.21.6	Reporting	Project Scientist / Engineer	hour	5	\$55.000	\$ 275	5	\$ 55.000	\$ 275	
<i>6.22 Material</i>										
6.22.1	Sampling	Glass Coliwesas, disposable, 200ml case of 12	each	3	\$99.920	\$ 300	3	\$ 99.920	\$ 300	
6.22.2	Drain/flush liquids in pipes	Pumps, Hoses, Blower, Fittings for draining pipelines	each	83	\$214.350	\$ 17,791	See Subtask 6.22.3			

TABLE 1. COMPARISON OF DTSC AND EPC CLOSURE COST ESTIMATES AS PROPOSED IN ISOCI's PART B APPLICATION
(see legend and notes on last page)

Task / Subtask Number	Task Description	Resource Description	Units	DTSC (10/29/03 letter from A. Plaza)			EPC (8/6/04, Part B revision 5)			Notes
				Quantity	Unit Cost	Extension	Quantity	Unit Cost	Extension	
6.22.3	Drain/flush liquids in pipes	Pumps, Hoses, Blower, Fittings for draining pipelines	day	See Subtask 6.22.2			4	\$ 500.000	\$ 2,000	[1]
<i>6.23 Subcontractor - Analytical</i>										
6.23.1	Water analysis	TAL Metals (EPA 6010/7000)	each	33	\$401.140	\$ 13,238	33	\$ 100.000	\$ 3,300	[11]
6.23.2	Water analysis	Purgeable Hydrocarbons (EPA 601)	each	33	\$137.520	\$ 4,538	33	\$ 90.000	\$ 2,970	[11]
6.23.3	Water analysis	Purgeable Aromatics (EPA 602)	each	33	\$102.910	\$ 3,396	33	\$ 90.000	\$ 2,970	[11]
6.23.4	Water analysis	Chlorinated Hydrocarbons (EPA 625)	each	33	\$238.510	\$ 7,871	33	\$ 170.000	\$ 5,610	[11]
6.23.5	Water analysis	Organochlorine Pesticides & PCBs (EPA 617)	each	33	\$216.030	\$ 7,129	33	\$ 140.000	\$ 4,620	[11]
6.23.6	Water analysis	Total Petroleum Hydrocarbons (SW8015B)	each	33	\$94.630	\$ 3,123	33	\$ 78.000	\$ 2,574	[11]
Subtask C.3 - Rinseate Wastewater Transportation & Disposal										
<i>6.24 Labor</i>										
6.24.1	Liquid loading	Environmental Technician	hour	444	\$35.000	\$ 15,540	20	\$ 35.000	\$ 700	[1]
6.24.2	Project management	Project Manager	hour	122	\$65.000	\$ 7,930	5	\$ 65.000	\$ 325	[1]
6.24.3	Planning documents	Project Scientist / Engineer	hour	5	\$55.000	\$ 275	5	\$ 55.000	\$ 275	
6.24.4	Reporting	Project Scientist / Engineer	hour	5	\$55.000	\$ 275	5	\$ 55.000	\$ 275	
<i>6.25 Equipment</i>										
6.25.1	Liquid loading into bulk tanker	Equipment rental per truckload	each	25	\$143.560	\$ 3,589	See Subtask 6.25.2			
6.25.2	Drain/Flush Liquids in Pipes	Pumps, Hoses, Blower, Fittings for draining pipelines	day	See Subtask 6.25.1			1	\$ 500.000	\$ 500	[1]
<i>6.26 Subcontractor - Transportation & Disposal</i>										
6.26.1	Transportation	Tanker Trailer Hazardous Waste Minimum Charge	each	25	\$934.700	\$ 23,368	2	\$ 934.700	\$ 1,869	[1]
6.26.2	Decontamination	Hazardous Waste, Truck Loads	each	25	\$193.390	\$ 4,835	2	\$ 193.390	\$ 387	[1]
6.26.3	Disposal	RCRA Bulk Liquids Incineration Fee	gals	122,064	\$0.580	\$ 70,797	10,000	\$ 0.580	\$ 5,800	[1]
<i>6.27 Subcontractor - Analytical</i>										
6.27.1	Water analysis	Profiling	each	2	\$560.820	\$ 1,122	2	\$ 560.820	\$ 1,122	

TABLE 1. COMPARISON OF DTSC AND EPC CLOSURE COST ESTIMATES AS PROPOSED IN ISOCI'S PART B APPLICATION
(see legend and notes on last page)

Task / Subtask Number	Task Description	Resource Description	Units	DTSC (10/29/03 letter from A. Plaza)			EPC (8/6/04, Part B revision 5)			Notes
				Quantity	Unit Cost	Extension	Quantity	Unit Cost	Extension	
TASK D: RAIL CAR UNIT										
IRRECONCILABLE DISCREPANCY IN DTSC "PROJECT COST OVER TIME REPORT"						\$ 8,685				
Subtask D.1 - Pipeline Drain/Flushing & Removal										
<i>6.28 Labor</i>										
6.28.1	Remove metal pipe	Environmental Technician	hour	1,661	\$35.014	\$ 58,158	-	\$ -	\$ -	[12]
6.28.2	Drain/Flush liquids in pipes	Environmental Technician	hour	312	\$35.000	\$ 10,920	312	\$ 35.000	\$ 10,920	
6.28.3	Haul & dispose debris	Environmental Technician	hour	2	\$35.000	\$ 70	2	\$ 35.000	\$ 70	
6.28.4	Project management	Project Manager	hour	150	\$72.285	\$ 10,843	40	\$ 65.000	\$ 2,600	[1]
6.28.5	Planning documents	Project Scientist / Engineer	hour	6	\$67.767	\$ 407	6	\$ 55.000	\$ 330	
6.28.6	Reporting	Project Scientist / Engineer	hour	6	\$67.767	\$ 407	6	\$ 55.000	\$ 330	
<i>6.29 Material</i>										
6.29.1	Drain/Flush Liquids in Pipes	Pumps, Hoses, Blower, Fittings for draining pipelines	each	168	\$214.374	\$ 36,015	See Subtask 6.29.2			
6.29.2	Drain/Flush Liquids in Pipes	Pumps, Hoses, Blower, Fittings for draining pipelines	day	See Subtask 6.29.1			5	\$ 500.000	\$ 2,500	[1]
<i>6.30 Equipment</i>										
6.30.1	Haul & dispose debris	16.5 CY Truck, 10 mile, Landfill	CY	14	\$4.520	\$ 63	14	\$ 4.520	\$ 63	
<i>6.31 Subcontractor - Analytical</i>										
6.31.1	Water analysis	TAL Metals (EPA 6010/7000)	each	12	\$401.140	\$ 4,814	12	\$ 100.000	\$ 1,200	[11]
6.31.2	Water analysis	Purgeable Hydrocarbons (EPA 601)	each	12	\$137.516	\$ 1,650	12	\$ 90.000	\$ 1,080	[11]
6.31.3	Water analysis	Purgeable Aromatics (EPA 602)	each	12	\$102.910	\$ 1,235	12	\$ 90.000	\$ 1,080	[11]
6.31.4	Water analysis	Chlorinated Hydrocarbons (EPA 625)	each	12	\$238.510	\$ 2,862	12	\$ 170.000	\$ 2,040	[11]
6.31.5	Water analysis	Organochlorine Pesticides & PCBs (EPA 617)	each	12	\$216.030	\$ 2,592	12	\$ 140.000	\$ 1,680	[11]
6.31.6	Water analysis	Total Petroleum Hydrocarbons (SW8015B)	each	12	\$94.634	\$ 1,136	12	\$ 78.000	\$ 936	[11]
6.31.7	Water analysis	Total Petroleum Hydrocarbons (EPA 418.1)	each	12	\$81.867	\$ 982	12	\$ 78.000	\$ 936	[11]
6.31.8	Water analysis	Volatile Organic Analysis (EPA 624)	each	12	\$253.884	\$ 3,047	12	\$ 90.000	\$ 1,080	[11]

TABLE 1. COMPARISON OF DTSC AND EPC CLOSURE COST ESTIMATES AS PROPOSED IN ISOCI's PART B APPLICATION
(see legend and notes on last page)

Task / Subtask Number	Task Description	Resource Description	Units	DTSC (10/29/03 letter from A. Plaza)			EPC (8/6/04, Part B revision 5)			Notes
				Quantity	Unit Cost	Extension	Quantity	Unit Cost	Extension	
6.31.9	QA/QC documentation	Data & Benchwork	each	12	\$141,252	\$ 1,695		\$ -	\$ -	[1]
<i>6.32 Subcontractor - Transportation & Disposal</i>										
6.32.1	Haul, dispose debris	Landfill Disposal Fee	CY	14	\$109,874	\$ 1,538	14	\$ 112,810	\$ 1,579	
Subtask D.2 - Disposal of Inventory										
<i>6.33 Labor</i>										
6.33.1	Decontaminate medium equipment	Environmental Technician	hour	36	\$35,518	\$ 1,279	36	\$ 35,000	\$ 1,260	
6.33.2	Liquid loading	Environmental Technician	hour	852	\$35,000	\$ 29,820	320	\$ 35,000	\$ 11,200	[1]
6.33.3	Project management	Project Manager	hour	150	\$72,285	\$ 10,843	40	\$ 65,000	\$ 2,600	[1]
6.33.4	Planning documents	Project Scientist / Engineer	hour	6	\$67,767	\$ 407	6	\$ 406,600	\$ 2,440	
6.33.5	Reporting	Project Scientist / Engineer	hour	6	\$67,767	\$ 407	6	\$ 406,600	\$ 2,440	
<i>6.34 Equipment</i>										
6.34.1	Liquid loading into bulk tanker	Equipment rental per truckload	each	48	\$143,824	\$ 6,904	48	\$ 143,560	\$ 6,891	
<i>6.35 Subcontractor - Transportation & Disposal</i>										
6.35.1	Transportation	Tanker Trailer Transport Hazardous Waste Minimum Charge	each	48	\$934,696	\$ 44,865	48	\$ 934,700	\$ 44,866	
6.35.2	Decontamination	Truck Washout/Decontamination	each	48	\$193,385	\$ 9,283	48	\$ 193,390	\$ 9,283	
6.35.3	Disposal	RCRA Water Incineration fee	gals	239,688	\$0.644	\$ 154,281	239,688	\$ 0.640	\$ 153,400	
<i>6.36 Subcontractor - Analytical</i>										
6.36.1	Waste analysis	Profiling	each	5	\$560,820	\$ 2,804	5	\$ 560,820	\$ 2,804	
Subtask D.3 - Disposal of Rinseate Wastewater										
<i>6.37 Labor</i>										
6.37.1	Liquid loading	Environmental Technician	hour	462	\$35,000	\$ 16,170	160	\$ 35,000	\$ 5,600	[1]
6.37.2	Project management	Project Manager	hour	150	\$72,285	\$ 10,843	40	\$ 65,000	\$ 2,600	[1]
6.37.3	Planning documents	Project Scientist / Engineer	hour	6	\$67,767	\$ 407	6	\$ 406,600	\$ 2,440	
6.37.4	Reporting	Project Scientist / Engineer	hour	6	\$67,767	\$ 407	6	\$ 406,600	\$ 2,440	
<i>6.38 Equipment</i>										
6.38.1	Liquid loading into bulk tanker	Equipment rental per truckload	each	26	\$143,150	\$ 3,722	26	\$143,150	\$ 3,722	

TABLE 1. COMPARISON OF DTSC AND EPC CLOSURE COST ESTIMATES AS PROPOSED IN ISOCI's PART B APPLICATION
(see legend and notes on last page)

Task / Subtask Number	Task Description	Resource Description	Units	DTSC (10/29/03 letter from A. Plaza)			EPC (8/6/04, Part B revision 5)			Notes
				Quantity	Unit Cost	Extension	Quantity	Unit Cost	Extension	
<i>6.39 Subcontractor - Transportation & Disposal</i>										
6.39.1	Transportation	Tanker Trailer Transport Hazardous Waste Minimum Charge	each	26	\$934.696	\$ 24,302	26	\$ 934.700	\$ 24,302	
6.39.2	Decontamination	Truck Washout/Decontamination	each	26	\$193.385	\$ 5,028	26	\$ 193.390	\$ 5,028	
6.39.3	Disposal	RCRA Water Incineration fee	gals	25,125	\$0.579	\$ 14,555	25,125	\$ 0.580	\$ 14,573	
<i>6.40 Subcontractor - Analytical</i>										
6.40.1	Waste analysis	Profiling	each	3	\$560.820	\$ 1,682	3	\$ 560.820	\$ 1,682	
	Sub Total					\$ 3,531,933			\$ 1,456,867	
	20% Contingency					\$ 706,387			\$ 291,373	
	Total Closure Cost					\$ 4,238,319			\$ 1,748,240	

Legend:

KGAL = 1,000 gallons; gals = gallons; SF = square feet; CY= cubic yard; CMA = container management area.

Notes:

- [1] Enviroserv estimate (Attachment 1).
- [2] EPC assumes outright purchase. See 8/5/04 facsimile quote from U.S. Environmental & Laboratory Supplies (Attachment 2).
- [3] EPC assumes outright purchase. See 8/5/04 internet quote from Tyler Tool Company (Attachment 3).
- [4] EPC assumes outright purchase. See 8/5/04 internet quote from Tuff Industries (Attachment 4).
- [5] EPC assumes 29 tanks with 1 sample from each. EPC unit pricing based on actual laboratory quote. See 8/5/04 facsimile quote from Applied P & Ch Laboratory (Attachment 5). Documentation package included in laboratory pricing.
- [6] EPC assumes analytical data from each tanks are sufficient.
- [7] EPC unit pricing based on actual laboratory quote. See 8/5/04 facsimile quote from Applied P & Ch Laboratory (Attachment 5). Documentation package included in laboratory pricing.
- [8] EPC estimate includes purging of 12 tanks.
- [9] EPC estimate includes samples for 12 tanks. EPC unit pricing based on actual laboratory quote. See 8/5/04 facsimile quote from Applied P & Ch Laboratory (Attachment 5). Documentation package included in laboratory pricing.
- [10] EPC estimate based on 8/5/04 facsimile quote from Skaggs Concrete Cutting Inc. (Attachment 6).
- [11] EPC unit pricing based on actual laboratory quote. See 8/5/04 facsimile quote from Applied P & Ch Laboratory (Attachment 5). Documentation package included in laboratory pricing.
- [12] The Closure Plan states that piping will be decontaminated but not dismantled, therefore cost of removing metal pipe is not included in EPC's estimate.

Attachment 1

**Proposed Facility Closure Cost Estimate
(Enviroserv)**



ENVIRONMENTAL RECOVERY SERVICES, INC.

2650 LIME AVENUE - SIGNAL HILL, CALIFORNIA 90806 - TEL. (562) 427-7277 - (800) 368-4778 - FAX (562) 490-7272

E Mail: nfrumkin@enviroserv.net

August 6, 2004

Mr. John Shubin, President
Industrial Service Oil Company, Inc.
1700 South Soto St.
Los Angeles, CA. 90023

Re: Proposed Facility Closure Cost Estimate

Dear Mr. Shubin:

Based on your current NON-RCRA waste characteristics and PROPOSED RCRA waste characteristics and inventories combined with our current labor, material, transportation and disposal costs, Environmental Recovery Services (Enviroserv) has reviewed the *Closure Cost Estimate for the Proposed Facility Operations* for Industrial Service Oil Company (ISOCI), prepared by EP Consultants (EPC). The closure cost estimate reflects the Closure Plan, as presented in the *Hazardous Waste Facility Permit Application – RCRA Part A & B* (Application), as revised through June 2004. Based on our professional judgment, Enviroserv agrees with the closure cost estimates as prepared.

Please keep in mind that these costs are subject to change over the course of time and should be revised annually to capture any cost increases/decreases.

Enviroserv has worked with ISOCI in the past and is familiar with the facility operations. With its dedicated and professional staff, Enviroserv can implement ISOCI's closure plan at the time of closure.

Please feel free to contact me at 562-427-7277 with any questions or comments.

Sincerely,
ENVIRONMENTAL RECOVERY SERVICES, INC.

//original signed by//

Neill Frumkin
Field Services Manager

Attachment: Closure Cost Estimate

**CLOSURE COST ESTIMATE FOR PROPOSED ISOCI FACILITY
 BASED ON PART B HAZARDOUS PERMIT APPLICATION UNIT DESCRIPTIONS THROUGH JUNE 2004 (REVISION 4)**

Task / Subtask Number	Task Description	Resource Description	Units	Quantity	Unit Cost	Extended Cost
Task A: Used Oil Tanks						
Subtask A.1 - Tank Decontamination						
<i>1.1 Labor</i>						
	Wipe contaminated surfaces	Environmental Technician	hour	320	\$ 35.000	\$ 11,200
	Decontaminate light equipment	Environmental Technician	hour	400	\$ 39.140	\$ 15,656
	High-pressure wash decontamination, 31,932 SF	Environmental Technician	hour	800	\$ 35.000	\$ 28,000
	Dry ice purge of tanks	Environmental Technician	hour	168	\$ 35.000	\$ 5,880
	Project Management	Project Manager	hour	400	\$ 65.000	\$ 26,000
<i>1.2 Material</i>						
	Operation of pressure washer	Operation of Pressure washer, including Water, Soap, Electricity & Labor	hours	240	\$ 8.590	\$ 2,062
Subtask A.2 - Used Oil Transportation & Disposal						
<i>2.1 Labor</i>						
	Liquid loading into tank truck	Environmental Technician	hour	300	\$ 35.000	\$ 10,500
	Project Management	Project Manager	hour	80	\$ 65.000	\$ 5,200
<i>2.2 Equipment</i>						
	Liquid loading into bulk tanker	Equipment rental per day	day	18	\$ 500.000	\$ 9,000
<i>2.4 Subcontractor -Transportation & Disposal</i>						
	Transportation	Used Oil Product	gals	430,000	\$ 0.060	\$ 25,800
	Transportation	Oily Wastewater	gals	470,000	\$ 0.058	\$ 27,260
	Disposal	Used Oil Product	gals	430,000	\$ 0.050	\$ 21,500
	Disposal	Oily Wastewater	gals	470,000	\$ 0.450	\$ 211,500
Subtask A.3 - Sludge Transportation & Disposal						
<i>3.1 Labor</i>						
	Liquid loading into tank truck	Environmental Technician	hour	80	\$ 35.000	\$ 2,800
	Project Management	Project Manager	hour	20	\$ 65.000	\$ 1,300
<i>3.4 Subcontractor -Transportation & Disposal</i>						
	Transportation	RCRA Sludge, Truck Loads	Tons	450	\$ 50.000	\$ 22,500
	Disposal	RCRA Sludge Incineration fee	Tons	450	\$ 150.000	\$ 67,500
Subtask A.4 - Rinseate Wastewater Transportation & Disposal						
<i>4.1 Labor</i>						
	Liquid loading into tank truck	Environmental Technician	hour	100	\$ 35.000	\$ 3,500
	Project Management	Project Manager	hour	20	\$ 65.000	\$ 1,300

**CLOSURE COST ESTIMATE FOR PROPOSED ISOCI FACILITY
 BASED ON PART B HAZARDOUS PERMIT APPLICATION UNIT DESCRIPTIONS THROUGH JUNE 2004 (REVISION 4)**

Task / Subtask Number	Task Description	Resource Description	Units	Quantity	Unit Cost	Extended Cost
<i>4.2 Equipment</i>						
	Liquid loading into bulk tanker	Equipment rental per day	day	5	\$ 500.000	\$ 2,500
<i>4.4 Subcontractor -Transportation & Disposal</i>						
	Transportation	Truck Loads	each	30	\$ 934.700	\$ 28,041
	Decontamination	Truck Loads	each	30	\$ 193.390	\$ 5,802
	Disposal	Incineration fee	gals	154,350	\$ 0.580	\$ 89,523
Subtask A.4 - Confirmation Soil Sampling						
<i>5.1 Labor</i>						
	Project Management	Project Manager	hour	32	\$ 65.000	\$ 2,080
Task B: Used Antifreeze Tanks						
Subtask B.2 - Used Antifreeze Transportation & Disposal						
<i>6.7 Subcontractor -Transportation & Disposal</i>						
	Transportation of antifreeze, glycol	Tanker Trailer Transport Hazardous Waste Minimum Charge	gals	43,957	\$ 0.070	\$ 3,077
	Transportation of fuel blend product	Tanker Trailer Transport Hazardous Waste Minimum Charge	gals	111,325	\$ 0.600	\$ 66,795
	Disposal of antifreeze, glycol	Disposal fee	gals	43,957	\$ 0.100	\$ 4,396
	Disposal of fuel blend	Disposal fee of RCRA Waste	gals	111,325	\$ 0.350	\$ 38,964
	Transportation	Drums content from Containment Management Area #7as RCRA Waste	gals	35,200	\$ 0.600	\$ 21,120
	Disposal	RCRA Waste Solid fee	gals	35,200	\$ 0.350	\$ 12,320
Subtask B.3 - Sludge Transportation & Disposal						
<i>6.11 Subcontractor -Transportation & Disposal</i>						
	Transportation	RCRA Sludge, Truck Loads	load	1	\$ 1,200.000	\$ 1,200
	Disposal	RCRA Sludge Incineration fee	Tons	10	\$ 145.000	\$ 1,450
	Transportation	CMA#1 Drums RCRA Sludge content	load	6	\$ 1,200.000	\$ 7,200
	Disposal	RCRA Sludge Incineration fee	Tons	143	\$ 145.000	\$ 20,735
	Transportation	Empty Drums as RCRA solid	load	1	\$ 1,200.000	\$ 1,200
	Disposal	Disposal fee as RCRA solid	each	840	\$ 10.000	\$ 8,400
Subtask B.4 - Rinseate Wastewater Transportation & Disposal						
<i>6.15 Subcontractor -Transportation & Disposal</i>						
	Disposal	RCRA Bulk Liquids Incineration Fee	gals	12,000	\$ 0.600	\$ 7,200
Task C: Secondary Containment Surface Decontamination & Pipe Flushing						

**CLOSURE COST ESTIMATE FOR PROPOSED ISOCI FACILITY
 BASED ON PART B HAZARDOUS PERMIT APPLICATION UNIT DESCRIPTIONS THROUGH JUNE 2004 (REVISION 4)**

Task / Subtask Number	Task Description	Resource Description	Units	Quantity	Unit Cost	Extended Cost
Subtask C.1 - Surface Decontamination						
6.16 Labor						
	Decontaminate surface	Environmental Technician	hour	350	\$ 35.000	\$ 12,250
	Project management	Project Manager	hour	80	\$ 65.000	\$ 5,200
Subtask C.2 - Pipe Flushing						
6.22 Material						
	Drain/flush liquids in pipes	Pumps, Hoses, Blower, Fittings for draining pipelines	day	4	\$ 500.000	\$ 2,000
Subtask C.3 - Rinseate Wastewater Transportation & Disposal						
6.24 Labor						
	Liquid loading	Environmental Technician	hour	20	\$ 35.000	\$ 700
	Project management	Project Manager	hour	5	\$ 65.000	\$ 325
6.25 Equipment						
	Drain/Flush Liquids in Pipes	Pumps, Hoses, Blower, Fittings for draining pipelines	day	1	\$ 500.000	\$ 500
6.26 Subcontractor - Transportation & Disposal						
	Transportation	Tanker Trailer Hazardous Waste Minimum Charge	each	2	\$ 934.700	\$ 1,869
	Decontamination	Hazardous Waste, Truck Loads	each	2	\$ 193.390	\$ 387
	Disposal	RCRA Bulk Liquids Incineration Fee	gals	10,000	\$ 0.580	\$ 5,800
Task D: Rail Car Unit						
Subtask D.1 - Pipeline Drain/Flushing & Removal						
6.28 Labor						
	Project management	Project Manager	hour	40	\$ 65.000	\$ 2,600
6.29 Material						
	Drain/Flush Liquids in Pipes	Pumps, Hoses, Blower, Fittings for draining pipelines	day	5	\$ 500.000	\$ 2,500
Subtask D.2 - Disposal of Inventory						
6.33 Labor						
	Liquid loading	Environmental Technician	hour	320	\$ 35.000	\$ 11,200
	Project management	Project Manager	hour	40	\$ 65.000	\$ 2,600
Subtask D.3 - Disposal of Rinseate Wastewater						
6.37 Labor						
	Liquid loading	Environmental Technician	hour	160	\$ 35.000	\$ 5,600
	Project management	Project Manager	hour	40	\$ 65.000	\$ 2,600
	GRAND TOTAL					\$ 876,591

Attachment 2

**Quote for Organic Vapor Analyzer
(US E&L)**

NOTE [2]

U.S. Environmental & Laboratory Supplies, LLC
Rentals, Sales and Service

FACSIMILE TRANSMITTAL SHEET

TO: Dhananjay Rawal	FROM: Don Strenger
COMPANY: Enviro Compliance Solutions, Inc	DATE: 8/5/2004
FAX NUMBER: 949-770-2331	TOTAL NO. OF PAGES INCLUDING COVER: 1
PHONE NUMBER: 949-413-6486	SENDER'S REFERENCE NUMBER:
RE:	YOUR REFERENCE NUMBER:

URGENT FOR REVIEW PLEASE COMMENT PLEASE REPLY PLEASE RECYCLE

NOTES/COMMENTS:

Dhananjay:

Per our conversation, please find the attached pricing:

RAE Systems MiniRAE 2000 PID:	\$ 2,950.	
Photovac X microFID:	X \$ 195.	

These prices exclude carrying case, shipping, handling & sales tax. Units are available for immediate delivery.

Thanks for the opportunity. If you have any additional questions or need further information, please feel free to call.

Best regards,

//original signed by//

Don Strenger

Attachment 3

**Quote for Electric Power Washer
(Tyler Tool)**

NOTE [3]

Tyler Tool Company



Porter-Cable PCE1700 1700 psi 2hp Electric Pressure Washer

Commercial Electric Pressure Washer featuring:

1700 PSI at 1.7 GPM produces 2,890 cleaning units

2.0 HP 120 volt industrial electric motor

35' x 14 gauge electric cord with GFCI plug

10" all-terrain pneumatic wheels

Q.C. spray wand with 4 spray nozzles

25' x 5/16" heavy-duty hose with quick connect fittings

Availability: Usually ships the same business day.

PORCAB PCE1700 Suggested Industry price: \$750.00 Sale price: **\$459.00**

[Order/Check Availability](#)



INTERNET : 8/5/04

Special Offer!!! For a limited time, place an online order for 99.00 or more and get FREE Ground Shipping in the lower 48 states. If your order is 99.00 or more, just select the Standard Ground option from the shipping methods! If your order is less, it's still only \$5.50 per order in the lower 48 states! This applies to all items except babbitt, chain, bandsaw blades and Jet Equipment! On these items the shipment charges will be quoted upon request. Other methods and destinations are available and quoted at your request.

We strive to ship all orders the same day if ordered by 12:00 Noon CST.

Attachment 4

**Quote for High Pressure Washer
(Tuff Industries)**

NOTE [4] (2 pages)

Orderline: 1-877-389-3131



company support order info

▶ CATALOG ▶ MY ACCOUNT ▶ SEARCH ▶ BASKET



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Toll-Free Orderline: 1-877-389-3131

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CLICK FOR DETAILS

- ▶ POWER WASHING
- ▶ JANITORIAL SUPPLY
- ▶ WINDOW CLEANING
- ▶ PAINT EQUIPMENT
- ▶ SAFETY EQUIPMENT
- ▶ MORE DEPARTMENTS

next product →

Tuff Industries(elect.stationary pressure washer) 4.2 GPM @ 2000 PSI, 6 HP 230V / 3 phase-TNG series

Quick Order:

enter product #

Featured Products

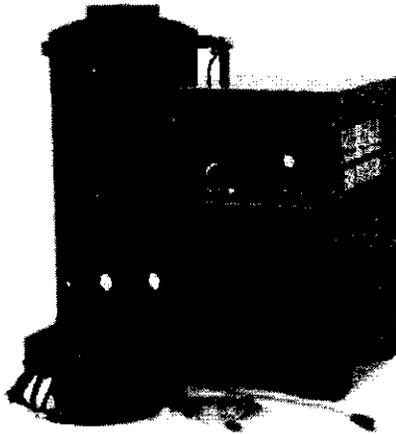


HERO (Hydrapulse) Line Striper Paint Sprayer 1.0 GPM @ 3,000 PSI-Gas

Search for:

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- NEWSLETTER SIGNUP
- CONTRACTOR LOCATOR
- USED CLASSIFIEDS
- SALE ITEMS!

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SKU: TI-TF402007B

MSRP: \$4,830.00
Your Price: Too low to advertise!
Add to basket to see your special pricing.

1

Add to Saved Shopping List

Select Options

- Include Steam Cleaning Combination (+\$60.50)
- Include Draft Diverter 10" (+\$75.00)
- Include Conversion Natural Gas to LP (w/ regulators) (+\$77.95)
- Include Wheel Kit w/ LP Bottle Rack (+\$285.95)
- Include Standing Pilot to Electronic Ignition (+\$158.25)
- Include Time Delay Shutdown (+\$227.50)
- Include Remote Operating w/ One Station(+\$360.95)
- Include Remote Operating, Time Delay, w/ One Station (+\$360.95)
- Include Remote Control Box Assy., Standard (+\$310.00)

Profit in Power Washing :
How to Start & Run a
Pressure Washing Service -
A Business Start-Up Manual

Unger MPS Deluxe Window
Cleaning Kit

INTERNET 8/5/04

Product Info

Standard Features:

- Available Natural Gas or LP Heated
- Available in 120V, 230V and 460V
- TriPlex Ceramic Plunger Pump Legacy
- Heavy Duty Block Mounted Unloader
- Forklift Guides for Installation Convenience
- Burner Power 120V AC
- Pressure Relief Valve
- Trigger Gun & 36" Insulated Wand

Dimensions: 27.5" x 44"

Weight: 650 lbs

Availability: Usually ships 7-10 business days

Ships via Freight. [Shipping Information](#)

Warranty Information

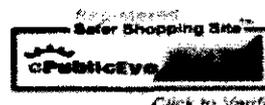
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Toll-Free Orderline: 1-877-389-3131

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08/05/2004

Attachment 5

**Quote for Analytical Services
(APCL)**

NOTES [5], [7], [9], [11]



Applied P & Ch Laboratory

A P C L 3760 Magnolia Ave. Chino CA 91710
Tel: (909)590-1828 Fax: (909)590-1498 Marketing Fax: (909) 902-1661

APCL Quotation

Quotation No. 2004_0067
 Quotation Date 8/5/2004
 Attn Project Manager: **Dhananjay Rawal**
 Client Name EP Consultants
 Client Address 24282 Sunnybrook Circle
 City, State, Zip Code Lake Forest CA 92630
 Phone: (949)413-6486
 Fax: (949)770-2331

No	Cata. No.	Description of Analysis	Method Code	Sample Matrix	Unit Price(\$)	Quantity	Price(\$)
1	1011	TAL Metals	6010B	Water	\$ 100.00	100	\$ 10,000.00
2	2490	Purgeable Halocarbons & Aromatics	624	Water	\$ 90.00	100	\$ 9,000.00
3	2601	Chlorinated Hydrocarbons	625	Water	\$ 170.00	100	\$ 17,000.00
4	2705	Organochlorine pesticides & PCBs	608	Water	\$ 140.00	100	\$ 14,000.00
5	2335	TPH: Gasoline & Diesel	8015M	Water	\$ 78.00	100	\$ 7,800.00
6	1011	TAL Metals	6010B	Soil	\$ 100.00	177	\$ 17,700.00
7	2490	VOCs	8260B	Soil	\$ 90.00	177	\$ 15,930.00
8	2610	Semi-Volatile Organics	8270C	Soil	\$ 170.00	177	\$ 30,090.00
9	2710	Organochlorine pesticides & PCBs	8081/8082	Soil	\$ 140.00	177	\$ 24,780.00
10	2335	TPH: Gasoline & Diesel	8015M	Soil	\$ 78.00	177	\$ 13,806.00
Subtotal:							#####

B. Special Service and Terms

- 01. Regular TAT: 7-10 working days
- 02. Rush Service Surcharge for report: 24 hours- 80%,
- 03. 48 hours -60%, 72 hours -40%, 4 days -30%, 5 days -10%
- 04. Documentation Package for QA Verification Included
- 05. This quotation is valid for 90 days starting from the quoted date.
- 06. Payment Terms: 30 days from the invoice date.
- 7. EDD and/or Package regular 21 days

Please feel free to call should you have any questions.

//original signed by//

Prepared by _____ Title: Marketing Director Date: August 5, 2004
 Dan Dischner

Attachment 6

**Price List
(Skaggs Concrete)**

SKAGGS**CONCRETE CUTTING, INC.**

ST. LIC. #481718

CORE DRILLING
Hourly Rate \$95.00
Plus Travel Time
(Price Per Ft/Per Hole)

	FLAT VAC. BASE HORIZONTAL	LIGHT STEEL	MEDIUM STEEL	HEAVY STEEL	ON WALL VERTICAL
1"	\$ 19.00	\$ 20.50	\$ 22.00	\$ 24.00	\$ 3.00
1 1/2"	20.50	22.00	24.00	26.00	3.00
2"	22.00	24.00	26.00	29.00	3.00
2 1/2"	24.00	26.00	29.00	32.00	3.00
3"	26.00	29.00	32.00	34.00	3.00
3 1/2"	29.00	32.00	34.00	38.00	3.00
4"	30.00	34.00	36.00	40.00	3.00
4 1/2"	32.00	36.00	40.00	46.00	3.00
5"	36.00	40.00	46.00	54.00	3.00
6"	40.00	46.00	54.00	62.00	3.00
7"	46.00	54.00	62.00	75.00	5.00
8"	52.00	58.00	66.00	79.00	5.00
9"	58.00	66.00	79.00	92.00	5.00
10"	66.00	76.00	92.00	105.00	5.00
11"	72.00	83.00	106.00	130.00	5.00
12"	78.00	90.00	120.00	155.00	5.00
14"	98.00	125.00	150.00	200.00	5.00
16"	200.00	225.00	250.00	300.00	5.00
18"	225.00	250.00	300.00	350.00	5.00

The above prices are estimates only and should be modified to take into consideration hole location, number of holes, amount of rebar to be encountered, layout, clean up, etc.

WALL SAWING
Minimum Job \$330.00
(Hourly Rate \$110.00)
Plus Travel Time

WALL THICKNESS	6"	8"	10"	12"
BLOCK MASONRY	\$7.50	\$10.00	\$12.00	\$15.00
REINFORCED CONCRETE	8.00	12.00	15.00	18.00
REINFORCED CONCRETE HEAVY STEEL	9.25	14.00	20.50	24.60

The above prices are based on cost per foot

The above prices are estimates only and should be modified to take into consideration location of cutting, clean up, layout, etc.

SATURDAY & NIGHT WORK ADD \$15.00 PER HOUR

Revised- May 2004

SKAGGS**CONCRETE CUTTING, INC.**

ST. LIC. #4R1718

**CONCRETE FLAT SAWING
GAS OR PROPANE
HOURLY RATE \$95.00
PLUS TRAVEL TIME
UP TO 12" DEEP CONCRETE SLAB SAWING AVAILABLE**

DEPTH OF CUT	1"	2"	3"	4"	5"	6"
0' - 24'	\$80.00	\$80.00	\$80.00	\$80.00	\$80.00	\$80.00
25' - 49'	80.00	80.00	80.00	80.00	2.18	2.48
50' - 99'	80.00	80.00	1.12	1.38	1.68	1.96
100' - 299'	.42	.66	.88	1.16	1.50	1.82
300' - 499'	.28	.48	.68	.92	1.18	1.46
500' - 999'	.24	.40	.58	.82	1.08	1.32
QUANTITY	.20	.34	.50	.68	.92	1.12

**ASPHALT FLAT SAWING
HOURLY RATE \$95.00
PLUS TRAVEL TIME
UP TO 12" DEEP ASPHALT SLAB SAWING AVAILABLE**

DEPTH OF CUT	1"	2"	3"	4"	5"	6"
0' - 99'	\$80.00	\$80.00	\$80.00	\$80.00	\$81.00	\$90.00
100' - 199'	80.00	80.00	98.00	.85	.99	1.12
200' - 299'	81.00	103.00	.58	.67	.78	.90
300' - 399'	.26	.37	.48	.58	.68	.79
400' - 499'	.22	.32	.41	.52	.63	.74
500' - 999'	.18	.27	.39	.49	.60	.72
QUANTITY	.16	.23	.32	.41	.51	.60

(GREEN CONCRETE ADD \$.09 TO ASPHALT PRICES)

The Above Prices are estimates only and should be modified to take into consideration location of cutting, amount of rebar, clean up, layout, etc.

AVAILABLE: HOURLY OR BID

GAS HAND SAWING
ELECTRIC HAND SAWINGDRY DRILLING
ROCK DRILLING

SATURDAY & NIGHT WORK ADD \$20.00 PER HOUR

Revised- May 2004

SKAGGS

CONCRETE CUTTING, INC.
ST. LIC. #481718

BREAKING AND REMOVAL

Flatbed Dump and Compressor
1 MAN \$ 85.00 PER HOUR - 3 HOUR MINIMUM
2 MEN \$ 125.00 PER HOUR - 2 HOUR MINIMUM

CHIPPING GUNS	90 LB. JACK HAMMERS
RIVET BUSTERS	60 LB. JACK HAMMERS
HAND SAW	CUTTING TORCHES

PLUS TRAVEL TIME & DUMP FEES

BOBCAT

BOBCAT WITH LOADER	\$95.00 PER HOUR
BOBCAT WITH BACKHOE	\$95.00 PER HOUR
BOBCAT WITH BREAKER	\$115.00 PER HOUR
BOBCAT WITH AUGER	\$115.00 PER HOUR
BOBCAT/BOBTAIL DUMP/COMBO	\$110.00 PER HOUR
BOBCAT/10 WHEEL DUMP/COMBO	\$120.00 PER HOUR

PLUS TRAVEL TIME & DUMP FEES

AVAILABLE: HOURLY OR BID

PRICES SUBJECT TO CHANGE

SATURDAY & NIGHT WORK ADD \$20.00 PER HOUR

1125 S. LAS BRISAS PLACE • PLACENTIA, CA 92870-0099 • (714) 793-7700 • FAX (714) 793-7701

Attachment 4

EPC Letter on Closure Cost Estimate to Mr.
Allan Plaza (10/31/05)

October 31, 2005

HAND-DELIVERED

Mr. Allan Plaza, P.E.
Unit Chief
Department of Toxic Substances Control
1011 North Grandview Avenue
Glendale, California 91201

Subject: **Response to DTSC Comments on Closure
Cost Estimate (Existing/Proposed Facility)
Industrial Service Oil Company, Inc.
Los Angeles, California**

Dear Mr. Plaza:

On behalf of Industrial Service Oil Company, Inc. (ISOCI), EP Consultants (EPC) is pleased to provide you with our response to your September 26, 2005 letter to ISOCI regarding the closure cost estimate (CCE) for the ISOCI facility at 1700 South Soto Street, Los Angeles, California (Facility). Your letter follows up on our September 12, 2005 meeting, and provides a comparison of DTSC's August 30, 2005 CCE and EPC's August 20, 2004 CCE. In addition, your letter provides an update to DTSC's August 2005 CCE to incorporate changes discussed during the meeting.

The following includes an overview of the current DTSC and EPC CCE's, followed by responses on specific CCE elements that are in question. In summary, there are two significant differences and issues between the DTSC and EPC CCE's.

First, EPC's CCE for the existing Facility is based on the CCE that was prepared by DTSC and ISOCI in 1994, with annual adjustments for inflation. Now, DTSC is proposing a cost that is four times as high. For over 10 years, DTSC did not express any concern about the existing Facility CCE and, in fact, it was found acceptable in May 2005 by Ms. Daphne Tseng and Mr. Satish Gulati. During our meeting last month, DTSC stated that the existing Facility CCE has to be adjusted as a part of the Part B permitting process. There have been no material changes to authorized operations at the existing Facility. DTSC did not provide any compelling reason for the change other than the availability of new software. It is unreasonable to increase the existing Facility CCE four-fold, expect ISOCI to incur the cost of additional

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October 31, 2005

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financial assurance mechanism, require a new ISD modification, and create further delays in the Part B permitting process. We implore you to revert to the existing Facility CCE as has been established.

The second major difference between the DTSC and EPC CCE's is about the cost basis and DTSC's software. DTSC has used unit cost factors provided by the software and is not adjusting them to reflect actual quotes that EPC has provided for labor, equipment, and other cost categories. ISOCI believes that generic cost factors and software limitations are not appropriate and should not prevail when actual quotes and real-world unit cost data are provided.

There are other relatively minor differences as described below, such as rental versus purchase of equipment, and the need for wipe and chip samples.

CCE Overview

DTSC's August 2005 CCE was \$2,175,517 for the existing Facility and \$3,431,146 for the proposed Facility. Your letter provides a revision to the existing Facility CCE, presumably shifting costs from existing to proposed, for equipment that is not currently authorized (e.g., wastewater treatment system, glycol recovery system), with a new CCE of \$1,707,928 for the existing Facility.

EPC's July 2005 CCE update is \$428,214 for the existing Facility, and EPC's August 2004 CCE is \$1,748,240 (2004 dollars) for the proposed Facility.

In summary, our understanding of the current CCE amounts is as follows:

DTSC and EPC Closure Cost Estimates for ISOCI Facility (as of 9/26/05)			
Facility Configuration	DTSC Estimate	EPC Estimate	Difference
Existing (Currently Authorized per ISD)	\$1,707,928	\$428,214	\$ 1,279,714
Proposed (Full Implementation of Part B)	\$3,431,146	\$1,791,072 *	\$ 1,640,074

* 2004 CCE increased by 2.45% to account for 2005 implicit price deflator (1/1/04 to 1/1/05).

Please note that the difference between DTSC and EPC estimates for the existing Facility is significantly greater than the \$438,452 amount stated in your letter.

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Field Activities

Your letter states that EPC's 2004 CCE for the proposed Facility indicates that a quotation was received from Environmental Recovery Service, Inc. (Enviroserv), but that no actual quotation was provided. In fact, the estimate provided in Attachment 1 to EPC's 2004 CCE package is intended to be a quotation from Enviroserv, and we can request any wording revisions necessary to satisfy your needs for it to be considered a "quotation."

With respect to your comment that the DTSC's CCE software does not have the option to input costs for labor, material, equipment and transportation: This is not a problem or concern as long as the total cost is reasonable and consistent with the costs that we may obtain from actual vendor/contractor quotes. Nevertheless, we are adamant that limitations of the software should not prevail over costs and quotes obtained from real-world vendors and contractors.

Air Monitoring

Your letter states that DTSC's CCE software does not have an individual item for rental or purchase of an organic vapor analyzer (OVA), and that the cost is built in to labor and equipment costs. See the comment above regarding vendor and contractor quotes – this is acceptable to us as long as the cost is reasonable and consistent with actual vendor quotes that we may obtain. Note that EPC's 2004 CCE for the proposed Facility includes purchase of an OVA for \$4,432, whereas DTSC's 2003 CCE included rental of an OVA for \$18,751 over 110 days. In such a case, EPC's purchase option is the efficient, cost-effective, and appropriate choice.

Pressure Washers

Your letter states that DTSC's CCE software does not have an individual item for rental or purchase of a pressure washer, and that the cost is built in to labor and equipment costs. See the comment above regarding vendor and contractor quotes – this is acceptable to us as long as the cost is reasonable and consistent with actual vendor quotes that we may obtain. Note that EPC's 2004 CCE for the proposed Facility includes purchase of two pressure washers for \$1,094, whereas DTSC's 2003 CCE included rental of pressure washers for \$9,450 over 7 months. In such a case, EPC's purchase option is the efficient, cost-effective, and appropriate choice.

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Analytical Costs

Your letter states that EPC's 2004 CCE does not include costs for wipe and concrete samples. This is because DTSC's 2003 CCE did not include wipe and concrete sampling costs, and EPC's 2004 CCE was intended to provide a line-by-line comparison of the two CCE's. In addition, EPC's proposed approach is to decontaminate all surfaces and analyze rinseate samples, thereby eliminating the need for wipe and concrete samples.

We request that DTSC reconsider the need for wipe and concrete samples. If it is concluded that these samples are needed, EPC can obtain and provide you with a quote for associated analytical costs.

Concrete Coring

DTSC's concrete coring cost is more than 200% higher than the quote that EPC obtained in 2004. If DTSC can get the cost to be reasonable and consistent with EPC's actual quote, the software limitation that you reference is acceptable to us.

Project Scientist/Engineer

There is a significant difference in this cost element. Your letter indicates that DTSC's software uses a 10 percent factor for engineering expenses, however EPC's estimate is significantly less and is based on EPC's professional experience with planning and reporting documents for RCRA closure activities. If desired, EPC can provide a separate letter with a quote for this effort, with wording to your specification. EPC's current engineering cost estimate for the proposed Facility is \$36,233, and DTSC's estimate for the existing Facility is \$146,927. (For reference, DTSC's 2003 estimate for the proposed Facility was only \$27,349).

Miscellaneous Costs

Although your letter references a software limitation regarding these costs, it is not a great concern to us as long as pertinent costs are consistent with DTSC's previous 2003 CCE. The only reason for this category in EPC's 2004 CCE for the proposed Facility is that DTSC's 2003 CCE had some unclassifiable costs.

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On behalf of ISOCI, EPC appreciates your attention to our comments. If you have any questions or comments, please call me at (310) 541-5407.

Very truly yours,

E P CONSULTANTS

//original signed by//

Anu Sood, P.E., C.P.P., R.E.A.
Principal
anu@epconsultants.net

cc: Leonard Robinson, DTSC
Claudia Bohorquez, Attorney-at-Law
John Shubin, ISOCI

Attachment 5

LADCP Letter on Permit by Right to Mr. Jose
Kou (3/24/93)

CITY OF LOS ANGELES
CALIFORNIA

CITY PLANNING
COMMISSION

WILLIAM C. LUDDY
PRESIDENT

THEODORE STEIN, JR.
VICE-PRESIDENT

LYDIA H. KENNARD

SIFRETTE NEIMAN

FERNANDO TORRES-GIL



TOM BRADLEY
MAYOR

DEPARTMENT OF
CITY PLANNING

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ROBERT H. SUTTON
DEPUTY DIRECTOR

(213) 237-1818

FAX (213) 237-0652

RAMONA HARO
SECRETARY

(213) 486-8071

*EPL #1/4
(Pacific League)*

March 24, 1993

Jose Kou, Chief
Facilities Management Branch
Department of Toxic Substances Control
1011 North Grandview Avenue
Glendale, CA 91201

Dear Mr. Kou:

HAZARDOUS WASTE FACILITY PROJECT AT 3150 EAST PICO BOULEVARD

In response to your request of February 22, 1993 to Robert Janovici, Chief of Zoning Administration, please be advised that operating hazardous waste facilities existing prior to August 6, 1990 in the M3 Zone classification, are permitted by right. Such facilities which come into existence after that date would require a conditional use permit to be granted by the City Planning Commission.

CON HOWE
Director of Planning

//original signed by//

Chief Examiner

GII:DR:rh

Attachment 6

Excerpt from LA City Zoning Code, Section
12.24 §§(A)-(H)

SEC. 12.24. CONDITIONAL USE PERMITS AND OTHER SIMILAR QUASI-JUDICIAL APPROVALS.

(Amended by Ord. No. 173,268, Eff. 7/1/00, Oper. 7/1/00.)

A. Applicability. (Amended by Ord. No. 173,492, Eff. 10/10/00.) This section shall apply to the conditional use approvals listed in Subsections U, V and W and to the other similar quasi-judicial approvals listed in Subsection X. These procedures apply only to uses in zones when not permitted by right.

B. Application for Permit. To apply for a permit, an applicant shall file an application with the Department of City Planning, on a form provided by the Department, and include all information required by the instructions on the application and the guidelines adopted by the Director of Planning. The Director of Planning shall adopt guidelines which shall be used to determine when an application is deemed complete.

C. Initial Decision. Except as otherwise provided in Charter Section [564](#) and Section [12.36](#) of this Code, the initial decision on an application shall be made by the Zoning Administrator, the Area Planning Commission or the City Planning Commission, as prescribed in Subsections U, V, W and X.

For purposes of this section, the initial decision shall mean approval in whole or in part with or without conditions, or denial of the application.

D. Public Hearing and Notice. Upon receipt of a complete application, the initial decision-maker shall set the matter for public hearing at which evidence shall be taken and may conduct the hearing itself or may designate a hearing officer to conduct the hearing.

The Department shall give notice in all of the following manners:

1. **Publication.** By at least one publication in a newspaper of general circulation in the City, designated for that purpose by the City Clerk, no less than 24 days prior to the date of hearing; and

2. **Written Notice.**

- (a) By mailing a written notice no less than 24 days prior to the date of the hearing to the applicant, the owner or owners of the property involved, and to the owners of all property within and outside of the City that is within 500 feet of the exterior boundaries of the property involved, using for the purpose of notification, the last known name and address of owners as shown on the records of the City Clerk or the records of the County Assessor. Where all property within the 500-foot radius is under the same ownership as the property involved in the application, the owners of all property that adjoins that ownership, or is separated from it only by a street, alley, public right-of-way or other easement, shall also be notified as set forth above; and

- (b) By mailing a written notice no less than 24 days prior to the date of the hearing to residential, commercial and industrial occupants of all property within 500 feet of the exterior boundaries of the property involved. This requirement can be met by mailing the notice to “**occupant**”; and

(c) If notice pursuant to Paragraphs (a) and (b) above will not result in notice being given to at least 20 different owners of at least 20 different lots other than the subject property, then the 500-foot radius for notification shall be increased in increments of 50 feet until the required number of persons and lots are encompassed within the expanded area. Notification shall then be given to all property owners and occupants within the expanded area.

3. **Site Posting.** By the applicant posting notice of the public hearing in a conspicuous place on the property involved at least ten days prior to the date of the public hearing. If a hearing examiner is designated to conduct the public hearing, then the applicant, in addition to posting notice of the public hearing, shall also post notice of the initial meeting of the decision-making body on the matter. This notice shall be posted in a conspicuous place on the property involved at least ten days prior to the date of the meeting. The Director of Planning may adopt guidelines consistent with this section for the posting of notices if the Director determines that those guidelines are necessary and appropriate.

E. Findings for Approval. In approving any conditional use, the decision-maker must find that the proposed location will be desirable to the public convenience or welfare, is proper in relation to adjacent uses or the development of the community, will not be materially detrimental to the character of development in the immediate neighborhood, and will be in harmony with the various elements and objectives of the General Plan. In addition, the decision-maker shall make any further findings required by Subsections U, V, W and X and shall determine that the proposed conditional use satisfies any applicable requirements for the use set forth in those sections. The decision-maker shall adopt written findings of fact supporting the decision based upon evidence in the record, including decision-maker or staff investigations.

F. Conditions of Approval. In approving the location of any conditional use, the decision-maker may impose those conditions, based upon written findings, which it deems necessary to protect the best interests of the surrounding property or neighborhood, to ensure that the development is compatible with the surrounding properties or neighborhood, or to lessen or prevent any detrimental effect on the surrounding property or neighborhood or to secure appropriate development in harmony with the objectives of the General Plan. The decision may state that the height and area regulations required by other provisions of this chapter shall not apply to the conditional use approved.

G. Time to Act. (Amended by Ord. No. 173,492, Eff. 10/10/00.) The initial decision shall be made within 75 days of the date the application is deemed complete, or within an extended period as mutually agreed upon in writing by the applicant and the decision-maker. An initial decision shall not be considered made until written findings are adopted in accordance with Subsection E. Upon making its decision, the initial decision-maker shall transmit a copy of the written findings and decision to the applicant, to all owners of properties abutting, across the street or alley from, or having a common corner with the subject property and to all persons who have filed a written request for the notice with the Department of City Planning.

Notwithstanding any provisions of this section to the contrary, the initial decision-maker shall make its decision on any application for a hazardous waste storage, treatment, or disposal facility, as governed by Subdivisions 10 and 11 of Subsection U of this section, pursuant to the time limits as set forth in Article 8.7 of the California Health and Safety Code.

H. Failure to Act - Transfer of Jurisdiction.

1. If the initial decision-maker fails to act on an application within 75 days from the date of filing a complete application, or within a mutually agreed upon extension of time, the applicant may file a request for a transfer of jurisdiction to the designated appellate body for decision. The designated appellate body is the body to whom the matter would normally be appealable, pursuant to Subsections U, V, W and X. The Director of Planning shall prescribe the form and manner of filing requests for transfers of jurisdiction.

2. When the designated appellate body receives the applicant's request for a transfer of jurisdiction, the initial decision-maker shall lose jurisdiction. However, the body to whom the matter is transferred may remand the matter to the initial decision-maker who shall regain jurisdiction for the time and purpose specified in the remand action. In addition, upon receipt of a written request by the applicant for withdrawal of the transfer of jurisdiction prior to the matter being heard by the appellate body, the matter shall be remanded to the initial decision-maker.

3. If the matter is not remanded, the decision-maker to whom the matter has been transferred shall consider the application following the same procedures and subject to the same limitations as are applicable to the initial decision-maker, except that the body to which the matter has been transferred shall act within 45 days of the transfer of jurisdiction. The Department of City Planning, including the Office of Zoning Administration, shall make investigations and furnish any reports requested by the body to which the matter has been transferred.

I. Appeals.

1. **Effective Date of Initial Decision.** An initial decision becomes final and effective upon the close of the 15-day appeal period if not appealed, or as provided in this subsection if appealed.

2. **Filing of an Appeal.** An applicant or any other person aggrieved by the initial decision of the Zoning Administrator may appeal the decision to the Area Planning Commission. An applicant or any other person aggrieved by the initial decision of the Area Planning Commission or the City Planning Commission may appeal the decision to the City Council. The appeal shall be filed within 15 days of the date of mailing of the initial decision on forms provided by the Department. The appeal shall set forth specifically the points at issue, the reasons for the appeal, and the basis upon which the appellant claims there was an error or abuse of discretion by the initial decision-maker. Any appeal not filed within the 15-day period shall not be considered by the appellate body. The filing of an appeal stays proceedings in the matter until the appellate body has made a decision. Once an appeal is filed, the initial decision-maker shall transmit the appeal and the file to the appellate body, together

Attachment 7

LADCP Parcel Profile Report for ISOCI Facility
(1/23/06)



**City of Los Angeles
Department of City Planning**

01/23/2006

PARCEL PROFILE REPORT

PROPERTY ADDRESSES

1700 S SOTO ST

ZIP CODES

90023

RECENT ACTIVITY

ENV-2006-49-CE
CPC-2006-48-ICO

CASE NUMBERS

CPC-1995-336-CRA
CPC-1986-445-GPC
ORD-166585-SA3760FF

Address/Legal Information

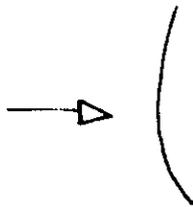
PIN Number: 118-5A221 68
Area (Calculated): 102,746.0 (sq ft)
Thomas Brothers Grid: PAGE 674 - GRID J1
PAGE 675 - GRID A1
Assessor Parcel Number: 5169017BRK
Tract: TR 8626
Map Reference: M B 121-96/100
Block: None
Lot: FR LT 8
Arb (Lot Cut Reference): 1

Jurisdictional Information

Community Plan Area: Boyle Heights
Area Planning Commission: East Los Angeles
Neighborhood Council: Boyle Heights
Council District: CD 14 - Jose Huizar
Census Tract #: 2051.20
LADBS District Office: Los Angeles Metro
Building Permit Info: View

Planning and Zoning Information

Special Notes: None
Zoning: M3-1
Zoning Information (ZI): ZI-1192 2000 ft. Buffer Zone for BZP Site (3200 East Washington Boulevard)
ZI-2270 Adelante Eastside Redevelopment Project
ZI-2129 Eastside State Enterprise Zone



General Plan Land Use: Heavy Manufacturing
Specific Plan Area: None
Historic Preservation Overlay Zone: None
Historical Cultural Monument: None
Mills Act Contract Number: None
POD - Pedestrian Oriented Districts: None
CDO - Community Design Overlay: None
Streetscape: No
Sign District: No
Adaptive Reuse Incentive Area: None
35% Density Bonus: Not Eligible
CRA - Community Redevelopment Agency: Adelante Eastside Redevelopment Project
Central City Parking: No
Downtown Parking: No
Building Line: None
500 Ft School Zone: No

Additional Information

Airport Hazard: None
Coastal Zone: None
Farmland: Area not Mapped
Very High Fire Hazard Severity Zone: No
Fire District No. 1: No
Fire District No. 2: Yes
Flood Zone: None
Hazardous Waste / Border Zone Properties: 2000 ft. Buffer Zone for BZP Site (3200 East Washington Boulevard)