

*Draft Environmental Impact Report
Part B Permit Application:
Romic Environmental Technologies Corporation
2081 Bay Road
East Palo Alto, California*



*California Environmental Protection Agency
Department of Toxic Substances Control
700 Heinz Avenue
Berkeley, California*

May 2005

*Draft Environmental Impact Report
Part B Permit Application
Romic Environmental Technologies Corporation
2081 Bay Road
East Palo Alto, California*

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Executive Summary

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Executive Summary

ES-1 INTRODUCTION

This draft Environmental Impact Report (dEIR) was prepared by the Department of Toxic Substances Control (DTSC) to examine the potential environmental impacts associated with approval of Romic Environmental Technologies Corporation's (Romic) request for renewal and modification of its Hazardous Waste Facility Permit (Permit). DTSC has principal responsibility for approving the project and is the Lead Agency under the California Environmental Quality Act (CEQA, Pub. Resources Code §21000 et seq.) and implementing Guidelines [Cal. Code Regs., tit. 14, §15000 et seq.] for preparation and approval of this dEIR.

ES-2 PROJECT OVERVIEW

ES-2.1 Project Location

The proposed project will occur at Romic's existing hazardous waste treatment, storage and recycling facility located at 2081 Bay Road in the City of East Palo Alto, California. The site is situated on a 14-acre privately owned parcel in the Ravenswood Industrial Area in the eastern portion of the City of East Palo Alto. The regional site location is shown in Figure ES-1.

ES-2.2 Project Description

DTSC is considering the issuance of a full Hazardous Waste Facility Permit to Romic that would authorize the company to continue to operate, and to conduct certain upgrades, limited expansions, and modifications to the facility. This action is being conducted pursuant to California Health and Safety Code (H&SC) §25200 and Cal. Code Regs., tit. 22, div. 4.5, chap. 20. A detailed description of activities

that would be authorized pursuant to Romic's proposed permit renewal and modification request is contained in Chapter 2.0 - Project Description.

ES-2.3 Need for the Proposed Project

The State Hazardous Waste Facility Permit previously issued to Romic for its existing facility expired in May 1991. The Federal Hazardous Waste Facility Permit expired on August 25, 2002. Pursuant to the Cal. Code Regs., tit. 22, § 66270.51, Romic is authorized to continue operating the facility because it had submitted a Permit Renewal Application to DTSC prior to the expiration date of the state permit.

Romic needs DTSC approval of the Permit Renewal Application to allow the facility to continue to operate, and to conduct certain upgrades, limited expansions, and modifications to the facility in order to be consistent with the current provisions of the H&SC, div.20, chap. 6.5, and Cal. Code Regs., tit. 22, div. 4.5.

ES-2.4 Project Objectives

The CEQA Guidelines (Cal. Code Regs., tit. 14, §15124(b)) require the EIR to include a statement of objectives sought by the proposed project. The objectives of the proposed project are as follows:

Objective A: To ensure that Romic can continue to provide a viable service for the safe and effective storage and treatment of hazardous wastes generated by businesses within and outside the State of California.

Objective B: To ensure that Romic can conduct necessary modifications to its facility to meet ever-changing market demands.

Objective C: To continue to provide a regional treatment, storage, recycling and transfer facility for the California generators for processing certain identified hazardous waste, most of which currently are authorized to be accepted at the Romco facility under existing permit conditions.

ES-2.5 Environmental Resource Areas Evaluated

The dEIR addresses environmental resource areas that DTSC determined may be potentially impacted by activities associated with the proposed project, as identified in the Notice of Preparation (NOP) for the project and during public scoping. The NOP and scoping comments to the NOP are provided as Appendix A and Appendix B, respectively.

The following environmental resource areas are addressed in Chapter 3.0 - Environmental Impact Analysis:

- 3.3.1 Aesthetics
- 3.3.2 Air Quality
- 3.3.3 Biological Resources
- 3.3.4 Cultural Resources
- 3.3.5 Geology and Soils
- 3.3.6 Hazards and Hazardous Materials
- 3.3.7 Hydrology and Water Quality
- 3.3.8 Land Use and Planning
- 3.3.9 Noise
- 3.3.10 Public Services
- 3.3.11 Transportation and Traffic
- 3.3.12 Utilities and Service Systems

The following environmental areas were not addressed in the dEIR because DTSC determined that the project did not have the potential to have a significant impact on

these areas: Agricultural Resources; Mineral Resources; Population and Housing; and Recreation.

ES-3 SIGNIFICANT EFFECTS, PROPOSED MITIGATION MEASURES AND ALTERNATIVES THAT WOULD REDUCE OR AVOID THOSE EFFECTS

ES-3.1 Significant Effects and Mitigation Measures

Anticipated environmental effects of the proposed project are evaluated in Chapter 3.0 for each potentially affected environmental area. Feasible mitigation measures that could minimize significant adverse impacts are identified. The significant environmental impacts, mitigation measures and residual impacts for each environmental resource area are shown in Table ES-1.

The dEIR concluded that while the project itself would not result in any significant impacts, it would contribute to significant, irreversible transportation and traffic impacts when considered in conjunction with the proposed Ravenswood District Redevelopment Plan.

ES-3.2 Evaluation of Project Alternatives

The CEQA Guidelines (Cal. Code Regs., tit. 14, § 15126.6(a)) require that an EIR consider alternatives to the proposed project if significant impacts are found that cannot be mitigated. While the project by itself will not cause significant impacts, the small increase in traffic that the project adds will contribute to a significant impact cumulatively caused by other projects that cannot be mitigated. Consequently, alternatives were considered in this dEIR. The alternatives are summarized below.

Alternative 1: No Project

Alternative 2: Continuation of Existing Permitted Facility

Alternative 3: Facility Closure

Environmentally Superior Alternative

A complete evaluation of these alternatives, including their ability to meet the objectives of the proposed project, and their ability to avoid or substantially lessen significant environmental impacts, is provided in Chapter 6.0 of this dEIR.

The dEIR concluded that alternative #2 was the environmentally superior alternative but that it did not meet the objective of the proposed project.

ES-4 AREAS OF CONTROVERSY/ CONCERN

During the public participation (scoping) process, a number of areas of concern were identified. These were:

- **Transportation of Hazardous Waste Through the Community** – the accidental release of hazardous materials/waste from a truck passing through the community on its way to or from the Romic facility is analyzed and discussed in Chapter 3 - ENVIRONMENTAL IMPACT ANALYSIS, Section 3.3.6 - Hazards and Hazardous Materials. The results of the analysis show that the maximum credible offsite release of a chemical routinely processed and stored at the Romic facility will not have a significant impact on human life or health.
- **Health and Safety Issues** - the accidental release or fire or explosion involving hazardous materials/waste at the Romic facility is analyzed and discussed in Chapter 3 - ENVIRONMENTAL IMPACT ANALYSIS, Section 3.3.6 - Hazards and Hazardous Materials. The results of the analysis show that the maximum

credible onsite release of a chemical routinely processed and stored at the Romic facility will not have a significant impact on human life or health in the surrounding community. There is also no realistic potential for a fire or explosion that would result in offsite impacts.

- **Environmental Concerns** – these include groundwater contamination, air emissions, odors, and noise. Groundwater at the facility is contaminated and is currently undergoing remediation. The potential for additional, future groundwater contamination is discussed and analyzed in Chapter 3 - ENVIRONMENTAL IMPACT ANALYSIS, Section 3.3.7 - Hydrology and Water Quality. The potential for additional, future groundwater contamination was found to be less than significant.

Air emissions and odors are analyzed and discussed in Chapter 3.0 - ENVIRONMENTAL IMPACT ANALYSIS, Section 3.3.2 - Air Quality. Emissions of both criteria and toxic air pollutants are less than significant when measured against Bay Area Air Quality Management District standards. Potential odors produced by the facility were analyzed in the Human Health Risk Assessment prepared in conjunction with this dEIR and were found to be below allowable odor thresholds at the Romic facility boundary.

Noise from the facility is analyzed and discussed in Chapter 3 - ENVIRONMENTAL IMPACT ANALYSIS, Section 3.3.9 - Noise. Noise measurements and calculations show that noise from both project construction and operation are within the standards established by the City of East Palo Alto.

- **Socio-Economic Impacts** – these include lower property values or prevention of new businesses locating in East Palo Alto due to implementation of the project. The project will not result in physical changes to the environment that would lead to direct or indirect economic or social effects. Therefore, further analysis of socio-economic impacts was not deemed necessary.

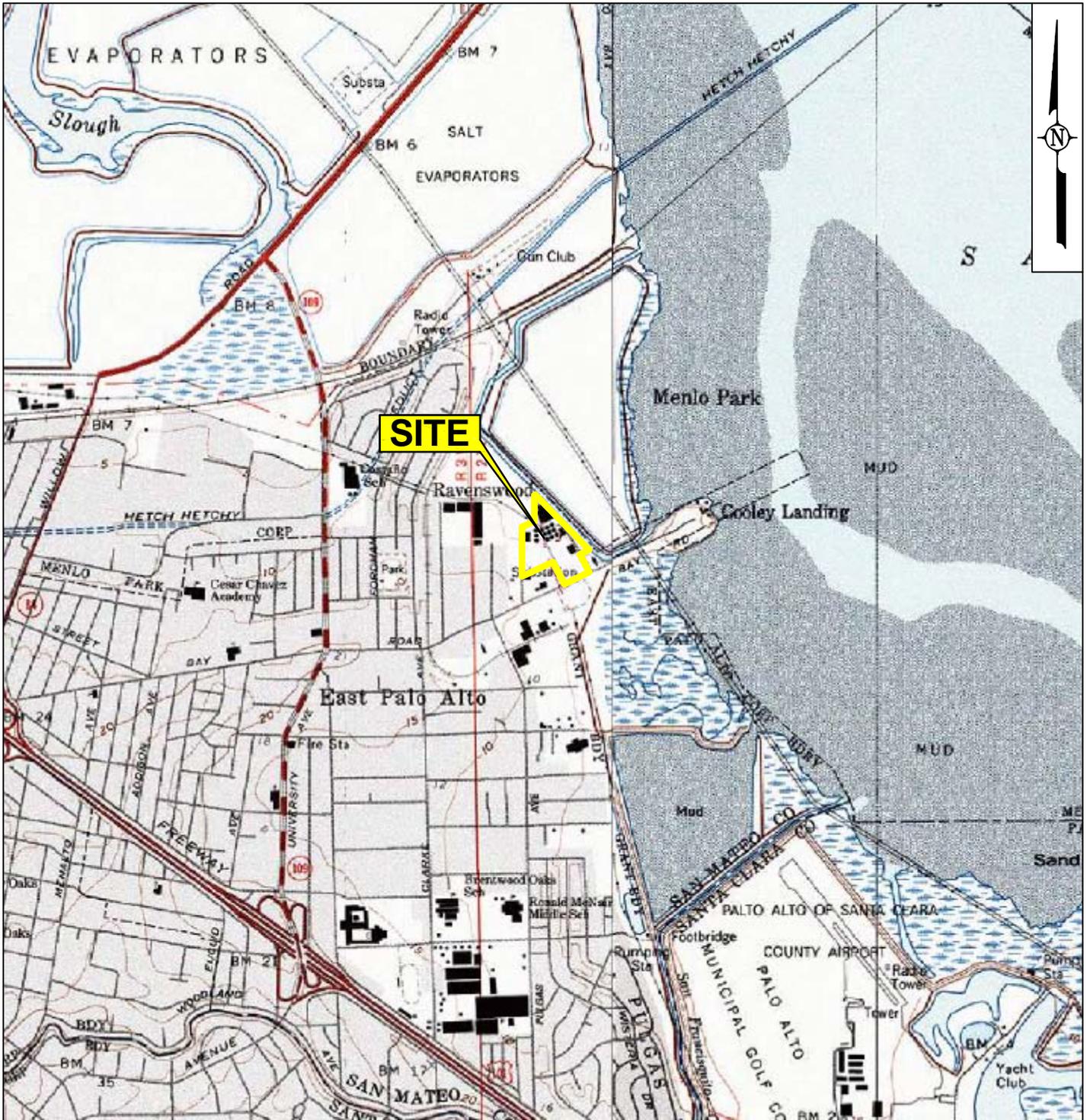
ES-5 ISSUES TO BE RESOLVED

There are no outstanding issues to be resolved with regard to the environmental analysis contained in the dEIR for the proposed project.

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TABLE ES-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Environmental Area	Environmental Impacts	Mitigation Measures	Residual Impacts
Geology & Soils	None	None required	None
Air Quality	No significant impacts	None required	None
Hydrology and Water Quality	No significant impacts	None required	None
Biological Resources	No significant impacts	None required	None
Land Use and Planning	No significant impacts	None required	None
Hazards and Hazardous Materials	No significant impacts	None required	None
Transportation and Traffic	Key intersections impacted during peak commute hours.	Impact is cumulative. All possible mitigation measures taken by other development.	Significant
Public Services	No significant impacts	None required	None
Utilities and Utility Systems	No significant impacts	None required	None
Noise	No significant impacts	None required	None
Cultural Resources	No significant impacts	None required	None
Aesthetics	No significant impacts	None required	None



1 MILE 3/4 1/2 1/4 0 1 MILE



SCALE 1 : 24,000

SOURCE:

UNITED STATES GEOLOGICAL SURVEY
7.5 MINUTE TOPOGRAPHIC MAPS:
PALO ALTO AND MOUNTAIN VIEW
QUADRANGLES



PROJECT LOCATION

ROMIC ENVIRONMENTAL
TECHNOLOGIES CORPORATION
EAST PALO ALTO, CALIFORNIA



FIGURE ES-1

1.0 - Introduction

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1.0 – Introduction

1.1 PURPOSE OF THE EIR

This draft Environmental Impact Report (dEIR) was prepared by the Department of Toxic Substances Control (DTSC) to examine the potential environmental impacts associated with approval of Romic Environmental Technologies Corporation's (Romic) request for renewal and modification of its Hazardous Waste Facility Permit (Permit). DTSC has principal responsibility for approving the project and is the Lead Agency under the California Environmental Quality Act (CEQA, Pub. Resources Code, div. 13, §21000 et seq.) and its implementing Guidelines [Cal. Code Regs., tit. 14, §15000 et seq.] for preparation and approval of this dEIR. A chronology of regulator decisions associated with the Romic East Palo Alto facility, including permitting decisions related to the CEQA process, is provided in Table 1-1.

The primary purposes of this dEIR are to:

- Present a detailed description of the proposed project at the Romic facility.
- Identify and evaluate potential environmental consequences of the proposed project.
- Indicate the manner in which those environmental consequences can be mitigated or avoided.
- Identify and analyze alternatives that may avoid or substantially lessen potentially significant environmental impacts associated with the proposed project.
- Identify any impacts that, even with implementation of mitigation measures, would be unavoidable and adverse.
- Provide documentation that supports these determinations.

The CEQA Guidelines provide the standard on which the adequacy of this EIR must be based. Specifically, the Guidelines state:

“An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness and a good faith effort at full disclosure.” (Cal. Code Regs., tit. 14, § 15151).

This draft EIR is being circulated to potentially affected agencies and the public for review and comment.

1.2 SCOPE OF THE EIR

Environmental Resource Areas Examined

DTSC reviewed Romic's Part B permit application and determined that several environmental resource areas had the potential to be impacted by the proposed project if it were approved. Consequently, DTSC made the decision to prepare an Environmental Impact Report (EIR) to further evaluate whether these impacts would be significant. DTSC gave notice that it would be preparing an EIR in a Notice of Preparation (NOP) that was used to solicit input from affected agencies and the public regarding the scope of the analysis that should be considered in the EIR. This NOP identified those resource areas that would be further evaluated. Taking into consideration the input received during the NOP and public scoping processes, DTSC determined that 12 environmental resource areas would be evaluated for potential

project impacts. These environmental resource areas and their corresponding section numbers in this report are:

- 3.3.1 Aesthetics
- 3.3.2 Air Quality
- 3.3.3 Biological Resources
- 3.3.4 Cultural Resources
- 3.3.5 Geology and Soils
- 3.3.6 Hazards and Hazardous Materials
- 3.3.7 Hydrology and Water Quality
- 3.3.8 Land Use and Planning
- 3.3.9 Noise
- 3.3.10 Public Services
- 3.3.11 Transportation and Traffic
- 3.3.12 Utilities and Service Systems

Environmental Resource Areas Not Examined.

The environmental resource areas that DTSC determined would not be potentially impacted and the reasons why they would not be further examined in this dEIR are:

- **Agricultural Resources** – The project does not have the potential to have a significant impact on agricultural resources because the project site is zoned for industrial use, is fully developed as an industrial site, and has been used as an industrial site for over 47 years. The project does not call for the conversion of farmland, nor does it conflict with existing zoning or Williamson Act contracts. Therefore, further analysis of impacts to Agricultural Resources was not deemed necessary.

- **Mineral Resources** – The project site does not contain mineral resources that would be of value to the region and the residents of the state. Further, the site is not a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. Therefore, further analysis of impacts to Mineral Resources was not deemed necessary.
- **Population and Housing** – The proposed project will not create an increase in the number of employees currently employed by Romac. Consequently, the project would not induce substantial population growth in the area nor cause the displacement of existing housing or people or necessitate construction of replacement housing in the area affected by the project. Therefore, further analysis of impacts to Population and Housing was not deemed necessary.
- **Recreation** – Since the number of employees will not increase because of the project, there would not be an increase in the use of existing neighborhood and regional parks or other recreational facilities. Further, the project does not include recreational facilities or require construction or expansion of recreational facilities that otherwise might have an adverse physical effect on the environment. Therefore, further analysis of impacts to Recreational Facilities was not deemed necessary.

Disposition of Other Considerations

- **Socio-economics.** The project will not result in physical changes to the environment that would lead to direct or indirect economic or social effects. Therefore, further analysis of socio-economic impacts was not deemed necessary.
- **Ecology.** Impacts to Ecological Resources are addressed in the Biological Resources section of this EIR

1.3 ORGANIZATION OF THE EIR

The content and format of this dEIR are organized into the following chapters to meet the requirements of CEQA and the State CEQA Guidelines:

Executive Summary. Provides a summary of the proposed project and alternatives, potential impacts and mitigation measures.

1.0 Introduction. Describes the purpose and use of the draft EIR and outlines the organization of the draft EIR.

2.0 Project Description. This chapter provides a description of existing and proposed operations as proposed in the Part B Permit application.

3.0 Environmental Impact Analysis. This chapter describes the current environmental conditions existing in the vicinity of the project, including Romic's existing permitted operations, as used in the local and regional planning processes. This environmental setting constitutes the baseline physical conditions by which DTSC determines whether an impact is significant in this EIR. (Cal. Code Regs., tit. 14, §15125(a)). In addition, this chapter contains an analysis of potential impacts to the environmental setting if Romic's request to continue to operate, to conduct upgrades, limited expansions and modifications to the facility is authorized by the DTSC.

4.0 Cumulative Impacts. This chapter provides an identification of other projects (both public and private) that, together with the proposed project, could cumulatively affect the environment of the region. Cumulative impacts could occur to the extent that impacts related to the proposed project could combine with impacts from other new and/or ongoing projects in the vicinity of the Romic facility.

5.0 Other CEQA Considerations. This chapter provides a discussion of other categories of environmental impacts that must be evaluated in an EIR in addition to those addressed in Chapter 3.0 Environmental Impact Analysis.

6.0 Project Alternatives Analysis. This chapter provides a discussion of a range of reasonable alternatives to the proposed project that would feasibly attain all or most of the basic objectives of the project and would avoid or substantially lessen any of the potentially significant environmental effects of the project.

7.0 Persons and Organizations Consulted. This chapter provides a list of individuals and organizations that have contributed data or concerns to be addressed in the Draft EIR. Persons and organizations that contributed to preparation of the Draft EIR also are identified. References and personal communications are listed at the end of each chapter or subchapter.

8.0 Abbreviations and Acronyms. This chapter provides a list of abbreviations and acronyms as they are used in this document.

Appendices. The following appendices to the Draft EIR are included in this document:

- Appendix A: Notice of Preparation
- Appendix B: Scoping Comments

1.4 AVAILABILITY OF DRAFT EIR

Copies of the Draft EIR and the Part B Permit Application are available at:

Department of Toxic Substances Control
700 Heinz Avenue, Suite 200
Berkeley, California 94710
(510) 540-2122

San Mateo County Library
East Palo Alto Branch
2415 University Avenue
East Palo Alto, CA 94303
(650) 321-7712

DTSC will receive agency and public input on the proposed project and the draft EIR at a public hearing to be scheduled in the future.

**TABLE 1-1
 CHRONOLOGY OF KEY REGULATORY DECISIONS
 AND PERMITTING OF ROMIC ENVIRONMENTAL TECHNOLOGIES CORPORATION
 East Palo Alto, California**

DATE	PERMIT	CEQA	ACTIVITY	COMMENT
11/19/80	X		Part A submitted	
5/6/81	X		Interim Status Document (ISD)	Authorization granted by the Department of Health Services
5/21/86	X		State Permit	Department of Health Services granted permit for : Drum Storage = 2531 or 139,205 gallons Tank Storage = 99,000 gallons in 18 tanks Treatment = 18,000 gal/day
6/17/86		X	Notice of Exemption	Notice of Exemption filed for the (Initial State Permit Issuance) Categorical exemption section 15301(f)
1/1/89	X		Federal Permit Application & State Permit Modification	Romic submitted Part A modification per EPA's request for RCRA permit determination and State permit modification
5/8/89	X		Federal Permit Application & State Permit Modification	Part B application received for RCRA permit determination and state permit modification.
3/15/90	X	X	Public Hearing	Joint Public Hearing held for both the Federal Permit and the State Permit Modification
5/31/90		X	Proposed Negative Declaration	Proposed Negative Declaration sent to State Clearinghouse.
7/5/90		X	Proposed Negative	The State Clearinghouse distributed the proposed ND for Romic to selected

DATE	PERMIT	CEQA	ACTIVITY	COMMENT
			Declaration	state agencies. No comments were received.
7/23/90	X		State Hazardous Waste Facility Permit Modification	Authorized the use of revised Part B dated 8/30/89. Effective date of modified state permit. Drum Storage = 2531 drums or 139,205 gallons Tank Storage = 99,000 gallons in 18 tanks Treatment = 6438 gal/hour
7/23/90	X		State Permit	Effective date of modified State Permit
7/27/90	X		Federal Permit	EPA signed Federal Permit. Not effective until 9/10/90.
9/13/90	X		Federal Permit	Palo Alto Park Mutual Water Company (PAPMWC) submitted a petition for administrative review to the Administrator of EPA.
5/21/91	X		State Permit	State Permit expired. Romic was allowed to continue operating treatment units under the expired permit, pending decision by Department of Health Services on permit submitted.
5/21/91	X		State Permit Application	Romic requested that the approved 8/1989 Part B permit application be allowed to be used as the application required to be submitted on 12/90. Romic was required to revise and submit by 5/21/1989.
8/25/92	X		Federal Hazardous Waste Permit	Effective date of the Federal Permit. Drum Storage = 2531 drums or 139,205 gallons Tank Storage = 241,000 gallons
6/21/93		X	Proposed Negative Declaration	Proposed Negative Declaration for the renewal of the State Permit is filed with the office of Planning and Research.
6/22/93	X		Proposed Draft Permit	Department of Toxic Substances Control issued a technical completeness determination for the application
6/25/93	X	X	Proposed Draft Permit	Department of Toxic Substances Control public noticed the draft Permit and the draft Negative Declaration for the permit
7/28/93		X	Proposed Negative Declaration	State Clearinghouse reported that none of the state agencies commented on the proposed Negative Declaration.

DATE	PERMIT	CEQA	ACTIVITY	COMMENT
11/30/93	X		Name Change	Romic Chemical changed name to Romic Environmental Technologies Corporation
1/13/94		X	Environmental Impact Report	Romic sent DTSC a letter confirming the intent to complete an Environmental Impact Report (EIR)
8/4/95		X	Memorandum of Understanding	Memorandum of Understanding signed to prepare the Environmental Impact Report
9/28/95		X	Notice of Preparation	Notice of Preparation for the EIR filed.
10/21/95		X	Public Scoping Meeting for EIR	
11/8/95		X	Public Notice	Public notice extended the public comment for the EIR scoping.
6/25/96	X		Permit Application	DTSC issued a Completeness Determination for the permit application.
1/15/99			Acquisition of Stock	US Liquids of Houston, Texas as of January 15, 1999 acquired the controlling stock for Romic.
5/5/99	X		Permit Modification	Requested newly listed federal and state waste codes and onsite administrative changes such as emergency coordinators information. New Part A filed as a result.
8/31/99	X		Permit Application	Romic submitted a revised Part B Permit Application
12/09/99	X		Completeness Determination rescinded	Clarified that technical completeness letter applied only to the May 1993 permit application and not the revised application dated August 31, 1999
2/22/00	X		Permit Application	Revised permit application submitted to include existing tanks in Part B permit
3/23/00	X		Permit Modification	Permit Modification approved
3/23/00		X	Notice of Exemption	Notice of Exemption filed for the Permit Modification approved
7/12/00	X		Permit Application	Romic submitted a revised Part B Application to include 33 existing intermediate product tanks. Application was reviewed and found deficient. Romic agreed to submit revised version in three phases.
1/24/01	X		Permit Application	The last of the 3 part permit application submitted.

DATE	PERMIT	CEQA	ACTIVITY	COMMENT
11/09/01	X		Permit Application	Romic resubmitted the entire application once again as requested by DTSC.
3/29/02	X		Supplemental Request for Information	DTSC requested that additional Supplemental Information be submitted
8/25/02	X		Federal Permit Expiration	Federal Permit expired. Romic was allowed to continue to operate under the expired permit pending decision by DTSC on permit application submitted.
12/30/02	X		Engineering Certifications	Certifications for the tanks completed and submitted for review.
6/24/03	X		Engineering Certifications	Certifications for the columns completed and submitted for review.
7/30/03	X		Stock Acquisition	Notification of the sale of the controlling stock of Romic Corporation to ERP Environmental (Three Cities).
9/11/03	X		Engineering Certifications	Certifications for column 49 and the mezzanine were completed and submitted for review.
12/02/03	X		Engineering Report	Seismic risk analysis reports submitted for Romic.
9/23/03		X	Health Risk Assessment	Health Risk Assessment completed
9/24/03		X	Public Workshop	Health Risk Assessment presentation in East Palo Alto
01/11/04	X		Permit Modification	Permit Modification requested to comply with Centralized Waste Treatment (CWT) Rule for more stringent discharge sewer requirements. Modification will include the installation of resin ion exchange bed and a carbon adsorption unit.
01/15/04	X		Permit Modification	Permit Modification requested to upgrade the installation of two reboiler tanks and apply concrete sealant to container storage areas.
4/16/04	X		Permit Modification	Approval of Class 1* modification and acknowledgement of receipt of Class 1 modification and associated revised pages for the approved operation plan.