

**POST-CLOSURE PERMIT
RENEWAL APPLICATION**

Square D Company

Project No.: 29864170.09100

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Prepared for:

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A. GENERAL INFORMATION

This document is an application for the renewal of an existing Resource Conservation and Recovery Act (RCRA) Post-Closure Permit for the North Post-Closure Area (NPCA) owned by Square D Company in Beaumont, California. The Square D Company facility (Facility) was a former manufacturer of copper sheet and foil products. The Facility ceased manufacturing activities in 1989, and Square D Company subsequently decommissioned and permanently closed the Facility in April 1990. Currently, the NPCA operates as a fully permitted Hazardous Waste (HW) Post-Closure facility. No HW treatment or disposal operations presently occur at the NPCA.

The original RCRA Part B Post-Closure Permit for the NPCA was issued on March 27, 1998 by the California Environmental Protection Agency's Department of Toxic Substances Control (DTSC). This document is an application for renewal of the RCRA Part B Post-Closure Permit which includes the following changes to the NPCA:

- Change in the Facility boundary to only include the NPCA;
- Proposed replacement of temporary fencing with permanent fencing and an access gates around the NPCA;
- Reinforcement of a section of the asphaltic closure cap for truck traffic; and
- Proposed installation of an additional groundwater monitoring well.

This RCRA Part B Post-Closure Permit renewal application for the NPCA has been prepared following the general form and structure of the Instructions for Preparing a Post-Closure Permit Application (June 2000, Revised January 2002) and the checklist provided by the DTSC. A complete copy of the checklist is provided in Appendix 1.

A.1 PART A PERMIT APPLICATION

Square D Company submitted the original RCRA Part A Permit application to the U.S. Environmental Protection Agency (EPA) in November 1980 for storage of HW in surface impoundments. In 1983, Square D Company amended the Part A Permit application to include changes in HW types and volumes. In November 1990, Square D Company revised the Part A Permit application again when the Facility was closed. An updated RCRA Part A Permit application (EPA Form 8700-23) for the NPCA is provided in Appendix 2.

A.2 PART B CERTIFICATION

This section is provided in accordance with the requirements of 40 CFR 270.11 and 22 California Code of Regulations (CCR) 66270.11.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Square D Company Signature: (Owner) Curt Christensen

Type or Print Name: Curt Christensen

Title: Staff Engineer

Date: June 5, 2008

A.3 GENERAL DESCRIPTION AND HISTORY

The Facility manufactured copper foil from 1970 to 1989. The Facility previously occupied nine acres of land in an industrially-zoned southeast portion of the City of Beaumont, California. The Facility was bounded on the east by Pennsylvania Avenue, on the south by Third Street, and on the north by a railroad right-of-way. The location of the Facility is shown in Figure A-1.

The Facility was formerly operated by the Yates Circuit Foil Division, a wholly-owned subsidiary of Square D Company. It was the world's largest manufacturer of copper foil, with seven plants worldwide, including two plants in the United States. The Yates Industries facility was reverted to Square D Company ownership and was wholly owned by Square D Company.

The Facility employed approximately 150 people in the manufacture of copper sheet and foil products. The Facility consisted of a main building, where copper materials were manufactured, and a series of settling ponds formerly used to store waste liquids and sludges generated from on-site wastewater treatment operations.

The Facility ceased manufacturing activities in 1989, and Square D Company subsequently de-commissioned and permanently closed the Facility in April 1990. All settling ponds were closed in 1988, and two post-closure areas were created, the NPCA and the South Post-Closure Area. All major buildings were retained at the site. In June 1996, the DTSC determined that the South Post-Closure Area had been closed in accordance with California regulations, and the site was released from any further Post-Closure Permit requirements.

On December 22, 1999, Square D Company sold a majority of the Facility property, with the exception of the NPCA to Priority Pallets Company. Priority Pallets currently leases the NPCA for temporary storage of wooden pallets.

A.4 STANDARD INDUSTRIAL CLASSIFICATION CODE / NORTH AMERICAN INDUSTRY CLASSIFICATION

Historically, the Standard Industrial Classification (SIC) code for the Facility was 3497 - Metal Foil and Leaf Manufacturing. However, an SIC Code is no longer applicable, since no operations, with the exception of site monitoring and maintenance are currently being conducted by Square D Company at the NPCA. Similarly, no North American Industry Classification (NAIC) is applicable for the NPCA. Tenant operations by Priority Pallets are not applicable.

A.5 OWNER/OPERATOR

The Square D Company is a market-leading global industry and is a division of Schneider Electric. The mailing address and phone number of the owner and the operator are as follows, respectively:

Owner

Square D Company
1415 South Roselle Road
Palatine, Illinois 60067
Contact: Curt Christensen (402-421-4537)

Operator

Square D Company
1415 South Roselle Road
Palatine, Illinois 60067
Contact: Curt Christensen (402-421-4537)

A.6 INDIAN LANDS

Not applicable. The facility is not located on Indian lands.

A.7 LISTING OF ALL PERMITS OR CONSTRUCTION APPROVALS

The following is a list of permits associated with the NPCA.

A.7.a Federal Permits

There are no federally issued permits for the NPCA.

A.7.b State Permits

The most recent RCRA Part B Post-Closure Permit modification for the NPCA was approved by the DTSC and effective on June 23, 2000. The Post-Closure Permit Number is 97-SC-001.

A.7.c Local Permits

In 1999, Square D Company was granted a lot line adjustment after the sale of the Facility. Lot A is also known as the NPCA. The lot line adjustment number is 98-LLA-7.

A.8 POST-CLOSURE NOTICES

Any changes in the type, location, or quantity of HW disposed within the NPCA shall be reported to the local zoning authority, or the authority with jurisdiction over local land use, and to the DTSC.

A.9 OTHER FEDERAL LAWS**A.9.a Wild and Scenic Rivers Act**

The Wild and Scenic Rivers Act establishes requirements applicable to water resource projects affecting wild, scenic, or recreational rivers within the National Wild and Scenic Rivers System, as well as rivers designated on the National Rivers Inventory to be studied for inclusion in the national system. Under this act, a federal agency may not assist, through grant, license, or otherwise, the construction of a water resources project that would have a direct and adverse effect on the values for which a river is established on the National Rivers Inventory or being studied for inclusion on the national system.

The NPCA is not a part of, or related to, any water resources project; therefore, the Wild and Scenic Rivers Act is not applicable.

A.9.b The National Historic Preservation Act

Section 110 of the National Historic Preservation Act of 1966 requires federal agencies to establish a program to locate, inventory, and nominate all properties under the agency's ownership that may be eligible for inclusion on the National Register of Historic Places. As regulated in Section 106 of the implementing regulations, federal agencies must take into account the effects of the agency's "undertakings" on properties included or eligible for inclusion on the National Register of Historic Places.

The activities associated with the NPCA as well as the former operations at the Facility do not have any effect on properties listed or eligible for listing in the National Register of Historic Places. Therefore, the National Historic Preservation Act is not applicable.

A.9.c The Endangered Species Act

Section 7(A)(2) of the Endangered Species Act of 1973 requires federal agencies to ensure that any action they authorize, fund, or carry out is not likely to jeopardize the continued existence of any endangered or threatened species or result in the destruction or adverse modification of designated critical habitat for such species. Section 7(c) of this act and implementing regulations published on June 3, 1986 (51 Federal Register 19926) require federal agencies to request from the U.S. Fish and Wildlife Service information on listed species or species proposed for listing that may be present in the area of proposed construction projects that are major federal actions significantly affecting the quality of the environment. If listed or proposed species may be present, the agency must conduct an assessment to determine whether the species are present in the area. If present, the potential effects of the action on the species must be considered for the protection of the sensitive resource.

The NPCA does not affect or impair endangered or threatened species or their habitat. Therefore, the Endangered Species Act is not applicable.

A.9.d Coastal Zone Management Act

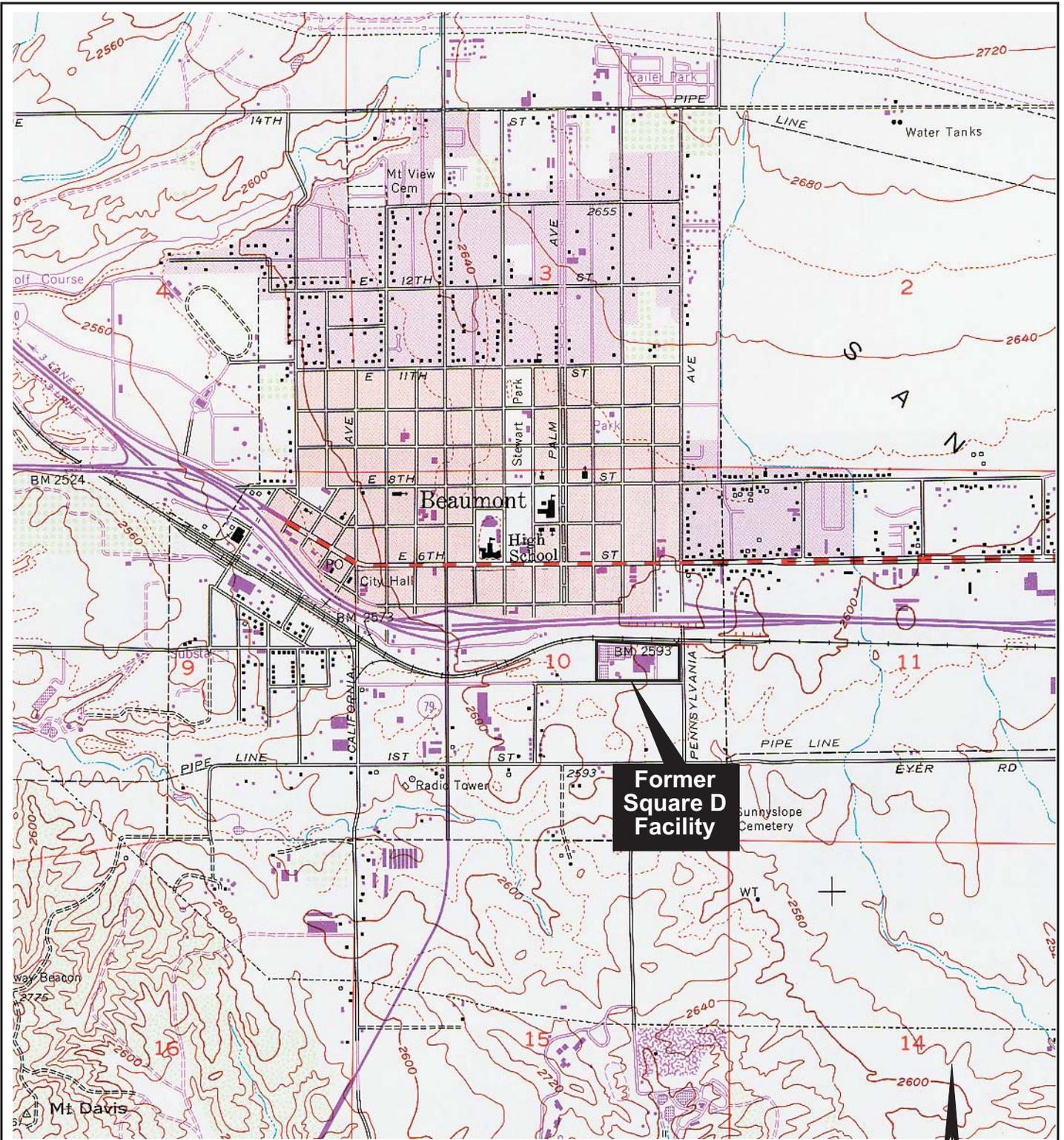
The Coastal Zone Management Act was promulgated in 1972 to protect coastal resources of national significance to include coastal wetland, beach, dune, barrier island, reef, estuary, fish and wildlife habitat, and any area that is determined by a coastal state to be of substantial biological or natural storm protective value.

This act does not apply to the NPCA because the Facility is not located in the coastal zone. Therefore, the Coastal Zone Management Act is not applicable.

A.9.e Fish and Wildlife Coordination Act

The Fish and Wildlife Coordination Act, with implemented regulations found in 40 CFR 270.3, requires the Regional Administrator to consult with the appropriate state agency exercising jurisdiction over wildlife resources to conserve resources before issuing a permit proposing or authorizing the impoundment, diversion, or other control or modification of any body of water.

Management of the NPCA does not result in the impoundment, diversion, control, or modification of surface water bodies. Therefore, the Fish and Wildlife Coordination Act is not applicable.



REFERENCE: USGS 7.5 Minute Series Beaumont, CA Quad,
Photorevised 1988

VICINITY MAP

Project No.: 29864170	Date: OCTOBER 2007	Project: SQUARE D COMPANY 1060 EAST 3RD ST., BEAUMONT, CA	Figure A-1
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B. FACILITY DESCRIPTION

B.1 DESCRIPTION OF FORMER SQUARE D COMPANY FACILITY OPERATIONS

Square D Company decommissioned and permanently closed the Facility in April 1990. The Facility employed approximately 150 people in the manufacture of copper sheet and foil products. The Facility consisted of a main building, where copper materials were manufactured, and a series of settling ponds formerly used to store waste liquids and sludges generated from on-site wastewater treatment operations. A description of the Facility structures and the former settling ponds is shown in Figure B-1.

The manufacturing activities at the Facility previously involved electroplating copper from solution into sheets or foil to make the final products. The Facility used pure copper wire or equivalent solid copper material (scrap metal and returned product). The copper was dissolved in sulfuric acid, resulting in a concentrated copper sulfate solution. Elemental copper was deposited from this solution onto a drum by electroplating. The process produced a thin copper foil roll, which was removed from the drum and treated with copper sulfate, zinc sulfate, and chromic acid solutions to prevent oxidation.

The waste streams produced at the Facility were primarily rinse waters and solid wastes generated from the plating operations. These wastes included spent plating baths and water rinses containing metal ions (copper, chromium, zinc, and lead). Other minor liquid wastes included spent non-halogenated solvents, drum sludges, and waste lubricating oils.

Solid wastes were generated since the start of operations in 1970. Solids wastes generated during production included spent filtration materials from activated carbon (AC) and diatomaceous earth (DE) filters. The AC was used to remove any potential organic compounds from the plating solutions. The DE was used to precoat bag filters that filtered out suspended matter from the plating solutions. This solid waste was stored on-site in an asphalt-lined settling basin (i.e. "Carbon Pond") constructed in 1973 prior to off-site disposal.

The methods used for on-site treatment of liquid wastes went through several stages of development since the Facility began operations. The original wastewater treatment system included initial discharge of wastewater to a hypalon-lined settling basin (i.e. "Process Pond 2") constructed in 1973. The wastewater was subsequently pumped to a lime neutralization plant, consisting of a 1,000-gallon stainless steel tank, where lime was added to neutralize the acidic plating solutions, and then to a 6,000-gallon circular clarifier. The overflow from the clarifier was discharged to the Publicly Owned Treatment Works (POTW). The settled metal hydroxide sludge in the clarifier (listed as F006 hazardous waste in 40 CFR 261.31) was pumped to a rotary vacuum filter. The resultant filter cake was stored and dried on-site prior to off-site disposal.

A hypalon-lined settling basin (i.e. "Process Pond 3") was used to hold concentrated copper sulfate solutions which required additional chemical adjustment prior to reuse. The solutions were recycled back into the plating operations after adjustment.

The North and South Settling Ponds were asphalt-lined ponds constructed at the Facility in 1973. The metal hydroxide filter cake was stored in these ponds until 1983 to provide additional dewatering by evaporation. The residual waters collected in each pond were decanted, collected, and discharged to the POTW. The collected sludge was discharged to the North or South Settling Ponds. When one pond was full of sludge, slurry flow was diverted to the other. The sludge was allowed to dry over a six-month period. After drying, the filter cake sludge was removed and sold to Inspiration Copper, a copper smelter in Globe, Arizona. This activity continued until 1983.

In 1975, a reverse osmosis (RO) unit (RO-1) was installed to concentrate and remove metals in the copper rinse waters. The concentrated reject wastewater was sent to Process Pond 2, and the dilute permeate water was recycled within the Facility and used for on-site operations.

In 1976, two additional RO units (RO-2 and RO-3) were installed to treat copper-bearing rinse water. RO-1 was also used to treat zinc-bearing rinse water. Spent copper rinse water was pumped to Process Pond 1 for feed stock to the RO units. Excess treated copper rinse water was periodically returned to Process Pond 1 for storage. All concentrated RO reject streams were pumped into Process Pond 2 for additional treatment by the lime neutralization plant.

In January 1979, a sulfate removal plant was constructed and began operation at the Facility. The sulfate removal plant reduced the sulfate concentration in the effluent wastewater discharged to the POTW. The sulfate removal plant was constructed in response to a sulfate discharge limitation of 125 milligrams per liter (mg/L) imposed by the City of Beaumont POTW.

In January 1981, an evaporator system was installed at the Facility to further concentrate the RO reject streams for reuse in the plating lines. Condensed (distilled) water from the evaporator was used as make-up water to the plating line rinse tanks, which reduced the loading on the process ponds and the lime neutralization plant by 50- 75%. The RO units were replaced between 1981 and 1982 with new RO units.

Additional post-treatment was conducted on the wastewater generated from the lime neutralization plant. Barium acetate was mixed with water to form a barium acetate solution. This solution was injected into the effluent wastewater generated from the lime neutralization plant to precipitate a solid barium sulfate. The resultant sludge was stored in an asphalt-lined settling basin (i.e. "Barium Pond") constructed in 1974. The Barium Pond was used for storage of barium sulfate sludge until November 1984.

In 1979, the asphalt-lined West Settling Pond was constructed at the Facility. The West Settling Pond was used to dry the metal hydroxide filter cake from the lime neutralization plant, and it was used interchangeably with the North and South Settling Ponds.

In January 1983, a lamella clarifier and filter press were installed after the lime neutralization plant. A second filter press was also installed to treat the barium sulfate sludge. The wastewater mixture from the lime neutralization system was pumped to the lamella clarifier instead of the circular clarifier. Supernatant liquid from the clarifier was mixed with the barium acetate solution, precipitated as barium sulfate, and was dewatered with the new barium filter press. The resultant filter cake was stored in the Barium Pond. The liquid filtrate from the new barium filter press was recycled to the circular clarifier and

subsequently discharged to the POTW. The settled sludges from the lamella clarifier were dewatered with the new lime plant filter press. The filter cake was initially stored in the West Settling Pond until the material could be shipped off-site to an approved recycler. The filtrate from the new lime plant filter press was recycled to the lamella clarifier.

In summary, there were three types of waste sludge previously generated at the Facility:

- **Metal Hydroxide Sludge:** Metal hydroxide sludge (blue) was generated from treating the plating bath rinse waters. Typical composition of the rinse water was: copper (1,000 mg/L), zinc (600 mg/L), chromium (50 mg/L), antimony (10 mg/L), arsenic (35 mg/L), lead (3 mg/L), and pH at 2.0 to 2.5 (Closure Plan, May 20, 1988). Approximately 700 tons per year of metal hydroxide sludge was generated by the Facility during its operation.
- **Barium Sulfate Sludge:** Barium sulfate sludge (white) was produced in a second treatment stage following metal hydroxide removal. Approximately 70 tons per year of barium sulfate sludge was generated by the Facility during its operation.
- **AC and DE Sludge:** AC (black) and DE (grey) sludge were byproducts from the filtration processes at the facility. Both AC and DE were used to remove organic materials and suspended solids from plating solutions. Approximately 30 tons per year of AC and DE sludge were generated by the Facility during its operation.

As a result of the installation of the lamella clarifier and two filter presses, the Facility was able to discontinue use of the North, South, and West Settling Ponds in November 1985. Filter cakes generated from both filter presses were subsequently placed directly into haul-away waste containers, which were removed from the Facility in less than 90 days and sent to a permitted Treatment, Storage, and Disposal Facility (TSDF), or a waste recycler. All settling ponds were closed in accordance with the approved Closure Plan, dated May 20, 1988.

B.2 DESCRIPTION OF SITE FOLLOWING CLOSURE OF SQUARE D COMPANY FACILITY OPERATIONS

The Facility ceased manufacturing activities in 1989, and Square D Company subsequently decommissioned and permanently closed the Facility in April 1990. All settling ponds were closed in accordance with the approved Closure Plan, dated May 20, 1988. Wastes were removed and the settling pond areas were covered with an asphaltic pavement cap. The former West Settling Pond was designated as the South Post-Closure Area. An area including the former North and South Settling Ponds; former Process Ponds 1, 2, and 3; former Barium Pond; former Carbon Pond; and the former location of the wastewater treatment plant was designated as the NPCA. All major buildings were retained at the site.

In June 1996, the DTSC determined that the South Post-Closure Area had been closed in accordance with California regulations, and the area was released from any further Post-Closure Permit requirements (including groundwater monitoring).

On December 22, 1999, Square D Company sold a majority of the Facility property, with the exception of the NPCA to Priority Pallets Company. Priority Pallets currently leases the NPCA for temporary storage of wooden pallets. The location of the NPCA is shown in Figure B-2. An aerial photograph of the current site is provided in Figure B-3.

B.3 UNITED STATES GEOLOGICAL SURVEY TOPOGRAPHIC MAPS

A topographic map of the Facility is provided in Figure B-4. A topographic map showing the NPCA and a distance of 2,000 feet around the NPCA is provided in Figure B-5. The topographic map is presented with a scale of 1 inch equal to 200 feet. The map also provides information on the 100-year flood plain areas in the vicinity of the NPCA.

B.3.a Map Scale and Date

The topographic map in Figure B-5 was created in October 2007 and presented with a scale of 1 inch equals 200 feet. It provides topographic information up to a 2,000-foot radius from the NPCA.

B.3.b Map Contours – Surface Water Flow

The NPCA is located in an area of relatively low topographic relief, with elevation contours ranging from 2,595 to 2,600 feet mean sea level (msl). Therefore, no significant external topographic or geomorphic features are expected to influence the surface water flow system in the vicinity of the NPCA. In addition, the NPCA asphaltic cap is elevated approximately 2 to 3½ feet above grade level. An 8-inch high asphaltic berm encloses a majority of the NPCA boundaries.

B.3.c Surface Water Features

Potrero Creek was observed approximately half a mile east of the NPCA. The San Gorgonio River is located approximately six miles east of the NPCA.

B.3.d Surrounding Land Uses

The NPCA is located in the northwest portion of the Facility. The surrounding area consists primarily of undeveloped land, commercial, and residential development. A site reconnaissance was conducted of the NPCA and the surrounding area on June 13, 2007. Observations of adjoining properties were limited to features and conditions that were visible from public right-of-way. Site photographs of the NPCA and surrounding area are presented in Appendix 3.

The following observations were made during the site reconnaissance:

North: A railroad right-of-way, the San Bernardino (Interstate 10) Freeway, and residential and commercial buildings beyond. A major portion of the City of Beaumont is also located north of the NPCA.

East: Pennsylvania Avenue and vacant, undeveloped property.

West: Vacant, undeveloped property.

South: East 3rd Street and undeveloped, rough-graded land with vegetation.

B.3.e Wind Rose

The wind rose for Beaumont, California is provided in Figure B-6. The wind rose is based on 3 years (2005 to 2007) of hourly wind data collected throughout all hours of the day. The information was obtained from the Western Regional Climate Center (<http://www.wrcc.dri.edu/index.html>) for the City of Beaumont, California.

The wind rose shows that winds at Beaumont primarily blow from a western direction. The seven spokes around the western direction comprise more than 50% of all hourly wind directions. Average wind speeds ranged from between 12 and 25 meters per hour. Statistic records for the typical wind frequency are classified by daily hours, and the speed ranges for the City of Beaumont are listed in Tables B-1 and B-2, respectively.

B.3.f Map Orientation

All maps and figures accompanying the NPCA Permit Renewal Application are drawn with a north arrow, with north towards the top of the map and south towards the bottom.

B.3.g Legal Boundaries and Land Use

The Square D Company no longer owns any property in Beaumont, California with the exception of the NPCA. The NPCA is located at the northwest corner of 3rd Street and Pennsylvania Avenue, Beaumont, California within Section 10 of Township 3 South, Range 1 West, San Bernardino Base & Meridian. It is listed as Assessor's Parcel Number 418-360-001 and is approximately 2.186 acres. A parcel map (Figure B-7) obtained from the County of Riverside Assessor-County Clerk-Recorder office provides the legal boundaries of the NPCA. The boundary dimensions of the NPCA are 331.78 linear feet along the north boundary of the site, 326.29 linear feet along the west, 230.64 linear feet across the south, and 457.20 linear feet along the east boundary.

Currently, the NPCA operates as a fully permitted Post-Closure area. There are no waste or treatment activities conducted at the site. The fenced area within the NPCA is currently leased to Priority Pallets for the temporary storage of wooden pallets.

B.3.h Security Measures / Access Controls / Internal Roads

The NPCA is enclosed within a security fence, as shown in Figure B-8. Site photographs are provided in Appendix 3. The fence is meant to reduce the possibility of unauthorized entry into the NPCA. An additional 8-inch high asphalt berm surrounds the asphalt cap inside the fence line to prevent run-on of storm water and to further limit vehicle access onto the site.

On the northern and western sides of the NPCA, the fence is currently constructed of galvanized steel with 3-inch diameter galvanized steel posts set in concrete foundations. The fence is 6 feet high and the posts are set at 50-foot intervals. Three strings of barbed wire are located at the top of the fence. Currently, temporary fencing is set up along the southern and southeast boundaries of the site. Upon approval of the Post-Closure Permit Renewal Application, the temporary fencing will be replaced with new, permanently installed fencing per a separate work plan.

Warning notices are posted at the two entry points to the NPCA stating, “Trucks Not Permitted.” Additional warning notices are painted on the asphalt cap stating, “Post-Closure Care Area – Unauthorized Personnel Keep Out” in letters that are a minimum of 12 inches high. The site is also monitored 24 hours per day by a series of security cameras. Once the new permanent fencing is installed, the camera surveillance system may be discontinued.

The sealed asphaltic closure cap, fencing, and signage are designed to provide adequate security to protect the site from exposure to the public, domestic livestock, and the environment during the post-closure care. The 24-hour security system for the NPCA is maintained by the use of fences, limited gate access, and security cameras. The existing security fence is maintained throughout post-closure care through monthly integrity inspections and maintenance, as required. A California licensed contractor is used to make the necessary repairs in accordance with standard procedures. Signage is repaired or replaced, as needed. Warning notices are repainted as needed with weather resistant paint. The stripes are repainted following resealing of the cap and/or as necessary with weather resistant paint.

The site has two access gates located on the southwest and northeast boundaries of the NPCA. Modifications to the gates are proposed to allow only forklift traffic. In addition, a site access roadway was constructed adjacent to and partially on the NPCA to allow truck traffic through the Facility.

B.3.i Injection and Withdrawal Wells

There are no injection and withdrawal wells constructed at the NPCA.

B.3.j Geologic and Hydrogeologic Information

The regional and site-specific geologic and hydrogeologic setting and characteristics have been discussed in several reports presented by SNR Company and Dames & Moore (SNR Company, 1992a; SNR Company, 1992b; Dames & Moore, 1992; Dames & Moore, 1993a; Dames & Moore, 1993b; and Dames & Moore, 1994). The reports presented detailed information about the regional, geologic, and hydrogeologic settings as well as site-specific hydrogeologic characteristics of the NPCA. This information can be summarized as follows:

Regional Setting

- The NPCA is situated geographically in the San Gorgonio Pass in an area of relatively low topographic relief, which is bounded to the south by the San Jacinto Mountains and to the north by the San Bernardino Mountains.
- The NPCA is underlain by a sedimentary sequence, including alluvial and continental deposits. The alluvial sediments are of Quaternary age that primarily consists of unconsolidated sand, silt, clay, and gravel. These alluvial sediments are underlain by Quaternary/Tertiary continental deposits of similar composition. The sedimentary sequence overlies pre-tertiary basement rocks comprised of metamorphic rocks and intrusive volcanic.
- Groundwater in the San Gorgonio Pass occurs mainly in two distinct alluvial units identified as older and younger alluvium.

- The San Gorgonio Pass Basin has been subdivided by Boyd (1969) into seven distinct subbasins. These subbasins, also called storage units, are generally bounded and divided by faults. The NPCA lies within the South Beaumont Storage Unit (SBSU) (Mittelhauser Corporation, 1985). In the area of the NPCA, groundwater occurs in the older alluvium unit. The older alluvium is comprised of poorly sorted gravel, sand, silt, and clay, believed to be Pliocene and Pleistocene age.
- According to Boyd (1969), groundwater in the SBSU occurs both in water-table and semi-perched conditions. Most of the domestic wells in the SBSU pump water from the semi-perched shallow water zone.
- Apparently, several wells are completed in the semi-perched zone along First Avenue, approximately half a mile south of the NPCA. Depths to water have been reported as ranging from 28 to 79 feet below ground surface (bgs) (Mittelhauser Corporation, 1985). A shallow semi-perched zone was not encountered at the Facility (Mittelhauser Corporation, 1985 and Dames & Moore, 1993a).
- The water-table aquifer occurs in the NPCA area at depths below 200 feet bgs (Dames & Moore, 1993a). The water-table aquifer is not differentiated into various aquifers at different depths. According to Boyd (1969), at least in one location in the Beaumont Storage Unit (BSU) (Mittelhauser Corporation, 1985), the thickness of the alluvial material overlying the basement complex is more than 2,200 feet. Based on the 1967 groundwater level contour map (Plate 2: Boyd, 1969), a pumping depression existed within the City of Beaumont (within the BSU), approximately 1 mile north-northwest of the NPCA. Based on the data in the Groundwater Monitoring Plan for Yates Industries, Inc. (Mittelhauser Corporation, 1985), there are two wells in the pumping depression area with total depths of 800 and 889 feet. Depths to groundwater are 399 and 406 feet, respectively. Assuming that the first water table appears at about 200 feet bgs in this area, it can be speculated that these wells are probably completed in deeper and highly permeable zones, capable of yielding significant amounts of water to create such a significant depression. According to Boyd (1969), many wells in the Beaumont-West Banning area reportedly yield more than 1,000 gallons per minute (gpm).

Site-Specific Geology and Hydrogeology

- A total of 16 borings have been drilled around the NPCA, extending to and/or below the water table. These borings ranged from approximately 200 to 300 feet bgs. Fourteen of these borings were completed as groundwater monitoring wells or piezometers. Based on the logs of these borings (Dames & Moore, 1993a), the Facility is predominantly underlain by fine-grained deposits consisting of intermittent layers of silty fine sand and silt with varying amounts of clay. Carbonate cementation was observed in both unsaturated and saturated zones.
- The first groundwater was encountered at depths of approximately 200 bgs at the Facility. No perched or semi-perched zone was encountered during drilling (Mittelhauser Corporation, 1985; Dames & Moore, 1993a). The saturated zone penetrated by the monitoring wells at the Facility

mainly consists of stringers of silty/clayey sand and gravel, embedded in a relatively impermeable fine-grained medium, partially cemented with calcite. Due to the fine-grained nature of the saturated zone, the groundwater yield is very low and the wells can be easily bailed dry. The purging rate of the wells during the quarterly groundwater sampling ranges from 0.1 to 0.2 gpm.

- The results of the slug tests conducted at the site by Dames & Moore and SNR Company (Dames & Moore, 1993b; Dames & Moore, 1994) show hydraulic conductivity values ranging from 1.94×10^{-7} feet per second (ft/sec) [5.91×10^{-6} cm/sec] to 1.2×10^{-5} ft/sec (3.64×10^{-4} cm/sec). Assuming a porosity of 0.2 for the aquifer, linear groundwater flow velocity values are calculated as less than 1 foot per year (ft/yr) to about 50 ft/yr.

B.3.k Buildings and Structures

The NPCA does not contain any buildings or structures.

B.3.l Sewers

A sewer line runs west to east across the northern portion of the Facility outside the NPCA boundary and drains to the southeast as shown in Figure B-4. A north-south sewer line also runs along the western outer edge of the NPCA and ends at the Northeast corner of the Facility. The use of all underground utility lines that traversed the NPCA was discontinued. Specifically, an old sewer line that traversed the NPCA was abandoned and replaced with the new sewer line described above.

B.3.m Flood Control / Drainage Barriers

The NPCA generally slopes to the northeast providing sheet flow drainage. The asphaltic cover of the NPCA is inspected monthly for cracks, depressions, and other signs of damage that may occur from settlement, subsidence, or displacement. If an area of the cover is found to have settled enough to collect surface water, it will be filled with asphalt to a level that prevents surface water accumulation.

The asphaltic cover of the NPCA has two separate drainage barriers consisting of an asphalt berm approximately 8 inches in height. The first berm is located along the northern and western boundaries of the NPCA. The second berm runs from the eastern boundary across the southern boundary of the NPCA. The berms are separated by access gates located on the southwestern and northeastern section of the NPCA. The location of the two berms is shown in Figure B-8.

B.3.n Run-on and Run-off Control Systems

The NPCA generally slopes to the northeast, providing sheet flow drainage. Storm water run-off from the asphalt cap flows into drainage swales that direct storm water off-site to the east. Significant run-on to the NPCA is not expected as the asphaltic cap is elevated approximately 2 to 3½ feet above the surrounding grade, minimizing the potential for run-on or for erosion damage from surface water run-on.

A majority of the NPCA boundary is also surrounded by an 8-inch high asphalt berm within the fenced perimeter as shown in Figure B-8. This run-on/run-off control structure is inspected monthly for cracks or damage. Maintenance and repair activities include, but are not limited to, the removal of debris, repair or replacement of the berm, and repair or replacement of cracks in the asphaltic cap.

However, if significant run-on does occur, and the asphaltic cap is damaged due to erosion, the areas that have been eroded will be repaired (replacement of eroded materials, sealing of eroded areas, etc.), so that the original design parameters of the cover are met. In addition, if any of the run-on/run-off control structures crack are damaged, the cause of the cracking or damage will be ascertained, and the structures will be repaired (replacement of damaged areas, sealing of damaged areas, etc.), so that the original design parameters of the run-on/run-off control structures are met.

All storm water run-off is discharged off-site to natural or man-made drainage areas. These drainage areas generally drain to the east. Normal run-off direction for the city streets bounding the Facility is also to the east.

B.3.o Existing Hazardous Waste Management Units and Solid Waste Management Units

The Process Pond 2, Barium Pond, Carbon Pond, and the North and South Settling Ponds were identified as hazardous waste management units (Section F.1.a) and are included in the NPCA. Process Ponds 1 and 3 were components of the Facility process operations and were not used to manage hazardous waste. However, due to their proximity to the other ponds, Process Ponds 1 and 3 are included in the NPCA.

B.3.p Waste Management Area Boundaries

The waste management area boundaries for the existing waste management units of NPCA are shown in Figure B-1.

B.3.q Point of Compliance

The point of compliance (POC) is defined as a vertical surface at the hydraulically downgradient limit of the waste management unit that extends through the uppermost aquifer underlying the regulated unit (Title 22 CCR Section 66264.95). The purpose of the POC is to establish a defined point where groundwater can be monitored downgradient of the regulated waste management unit to evaluate whether or not hazardous constituents are present and whether they are migrating off-site.

The POC for the NPCA is a vertical plane passing in an east-west direction along the northern Facility boundary and through existing Wells SDB-1, SDB-4, and SDB-5 as shown in Figure B-9. This plane extends downward into the uppermost aquifer and is hydraulically downgradient of the former waste management units contained within the NPCA. Thus, Wells SDB-1, SDB-4, and SDB-5 provide POC monitoring points for the NPCA.

Well Y-7, screened at a deeper interval than the other on-site wells, provides a monitoring point to evaluate potential vertical migration of constituents from the regulated waste management unit. Well SDB-6B is within the railroad right-of-way north of the NPCA and evaluates potential lateral downgradient migration of constituents from the NPCA. Well SDB-7 is also proposed to be installed within the railroad right-of-way to monitor lateral downgradient migration of constituents north of the NPCA. Well SDB-7 will be installed upon approval of the Post-Closure Permit Renewal Application.

B.3.r Groundwater Monitoring Well Locations

The locations and identification numbers of the current groundwater monitoring wells which constitute POC monitoring points as well as other monitoring wells and piezometers, which will be used to collect groundwater elevation and water quality data at the NPCA, are shown in Figure B-9. The current NPCA groundwater monitoring system consists of the following wells and piezometers:

Point-of-Compliance Downgradient

- ◆ Well SDB-1
- ◆ Well SDB-4
- ◆ Well SDB-5

Upgradient (Background)

- ◆ Well Y-3

Lateral Downgradient Assessment

- ◆ Well SDB-6B
- ◆ SDB-7 (proposed)

Vertical Assessment

- ◆ Well Y-7

In addition to these monitoring wells, groundwater elevation data will be collected only from the following monitoring wells and piezometers:

Groundwater Level Measurements

- ◆ Well SDBP-1A
- ◆ SDB-2
- ◆ SDB-3

Groundwater samples will not be collected from these wells unless requested by the DTSC. Background groundwater samples will be collected from upgradient Well Y-3 for the NPCA. Well Y-3, based on the approximately northern groundwater flow direction calculated for this area, is located hydraulically upgradient from the NPCA.

Wells Y-1, Y-2, Y-4, Y-5, Y-6, and Y-8 will be decommissioned and removed from the NPCA groundwater monitoring program. Well Y-1 was originally installed by The Earth Technology Corporation in 1983. Wells Y-2 through Y-6 were installed by Mittelhauser Corporation in 1985. Monitoring Well Y-8 was installed by the SNR Company in June 1989. Wells Y-1 and Y-5 will be decommissioned based on their poor design. Wells Y-2, Y-4, and Y-8 will be decommissioned due to their redundancy with Wells SDB-5, SDB-1A, and SDB-4, respectively. Additionally, Well Y-6 will be decommissioned because it is damaged, as discovered during an attempt to redevelop the well on September 26, 2007. A separate well decommissioning work plan will be prepared and submitted to the DTSC for approval.

Dames & Moore installed Wells SDB-1 through SDB-3 and Piezometer SDBP-1A in March through April 1993, Wells SDB-4 and SDB-5 in May through June 1993, and Well SDB-6B in August 1994. Well SDB-7 will be installed upon approval of the Post-Closure Permit Renewal Application. Monitoring well identification numbers have been placed on the wellheads. Details of the well installation and boring logs for Wells SDB-1 through SDB-5 and SDBP-1A are provided in the Additional Aquifer Characterization Report (Dames & Moore; August 13, 1993). Installation details for Well SDB-6B are provided in the Off-site Downgradient Monitoring Well Installation Report (Dames & Moore; November 23, 1994).

Groundwater samples will be collected following standard sampling procedures. Laboratory analyses of the samples for the parameters will be performed by a State of California Department of Health Services-certified laboratory. Analytical groundwater data will be evaluated by comparing the results to concentration limits specified in the Post-Closure Permit and by evaluation of time-series graphs under the Water Quality Sampling and Analysis Plan (WQSAP).

B.4 FLOOD PLAIN REQUIREMENTS

A potential source of flooding is Potrero Creek, whose channel lies approximately half a mile east of the NPCA. The location of NPCA in relation to the 100-year floodplain is depicted in Figure B-5, provided by the 2004 National Flood Insurance Program (NFIP), part of the Federal Emergency Management Agency (FEMA). It indicates that the NPCA is located outside the 100-year floodplain. Flood proofing and flood protective measures are not required, and a waiver for land storage and disposal facilities from the floodplain standard will not be requested as the NPCA is located outside the 100-year floodplain.

Table B-1
 Beaumont California
 Typical Wind Frequency Classified by Daily Hours (counts)

Latitude: 33° 55' 50" N
 Longitude: 116° 56' 23" W
 Elevation: 2680 ft.

State Date: August 1, 2003
 End Date: October 31, 2007
 # of Days: 1553 of 1553

Time	Speed	U-Vel	V-Vel	Res Spd	Res Dir	Dir Con	Num Spd	Num D
0	3.4	0.4	-0.6	0.7	301	0.206	1519	1519
1	3.4	0.6	-0.5	0.8	316	0.225	1516	1516
2	3.5	0.6	-0.5	0.8	324	0.225	1519	1519
3	3.5	0.7	-0.3	0.8	334	0.219	1523	1523
4	3.6	0.7	-0.3	0.7	339	0.207	1521	1521
5	3.7	0.8	-0.2	0.8	347	0.214	1520	1520
6	3.9	0.7	-0.0	0.7	359	0.183	1521	1521
7	4.5	0.2	0.2	0.3	39	0.064	1519	1519
8	5.4	-0.2	0.5	0.6	113	0.103	1511	1511
9	6.3	-0.8	0.7	1.1	136	0.168	1518	1518
10	7.0	-1.0	0.9	1.3	140	0.190	1515	1515
11	7.4	-1.3	0.8	1.6	149	0.212	1518	1518
12	7.6	-1.3	0.5	1.4	159	0.184	1520	1519
13	7.6	-1.4	-0.1	1.4	183	0.180	1517	1517
14	7.5	-1.1	-0.3	1.2	193	0.155	1521	1521
15	7.3	-0.9	-0.7	1.1	218	0.154	1519	1519
16	7.1	-0.9	-0.7	1.2	220	0.163	1518	1518
17	6.0	-0.9	-0.9	1.3	225	0.213	1517	1517
18	5.0	-0.7	-1.0	1.2	237	0.240	1513	1513
19	4.4	-0.7	-1.1	1.3	239	0.285	1514	1514
20	4.0	-0.6	-1.2	1.4	245	0.340	1518	1518
21	3.7	-0.3	-1.0	1.0	253	0.278	1519	1519
22	3.6	0.1	-0.8	0.8	276	0.230	1517	1517
23	3.5	0.3	-0.8	0.8	289	0.229	1519	1519
ALL	5.1	-0.3	-0.3	1.0	226	0.196	36432	364

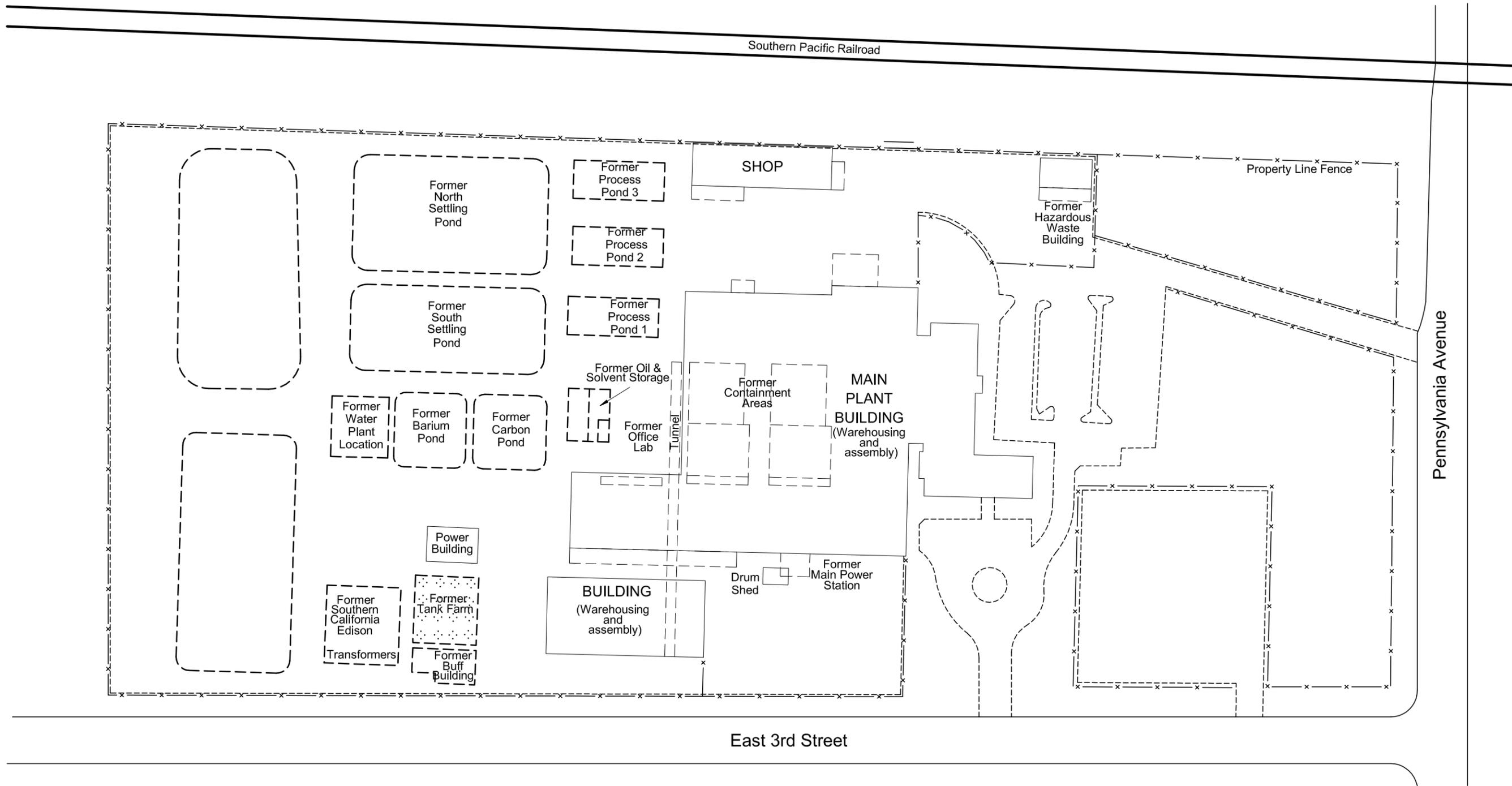
- Speed - Average (Scalar) Speed in MPH
- U-Vel - East-West Velocity, Positive to East
- V-Vel - North-South Velocity, Positive to North
- Res Spd - Vector Average (resultant) Speed in MPH
- Res Dir - Vector Average (resultant) Direction
- Dir Con - Directional Constancy (Res Spd/Speed)
- Num Spd - Number of Wind Speed Observations
- Num Dir - Number of Wind Direction Observations

Table B-2
 Beaumont California
 Typical Wind Frequency Classified by Speed Ranges (counts)

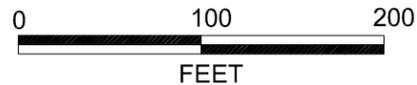
Latitude: 33° 55' 50" N
 Longitude: 116° 56' 23" W
 Elevation: 2680 ft.

State Date: August 1, 2003
 End Date: October 31, 2007
 # of Days: 1553 of 1553

Range	(mph)	N	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW
1.3 -	4	346	322	300	239	249	159	101	102	134	245
4 -	8	245	243	377	953	1103	304	169	161	230	961
8 -	13	20	14	57	565	1787	170	13	6	67	604
13 -	19	0	3	4	194	1230	62	2	0	3	26
19 -	25	1	0	1	14	198	4	1	4	4	3
25 -	32	0	1	1	0	8	1	1	2	3	0
32 -	39	0	0	0	0	0	0	0	0	0	0
39 -	47	0	0	0	0	0	0	0	0	0	0
47 -		0	0	1	0	1	2	1	1	1	0
Total		612	583	741	1965	4576	702	288	276	442	1839
Calm	(<1.3)										
Avg. Speed		4.2	4.0	4.7	7.4	10.4	7.0	5.0	5.0	5.6	6.5



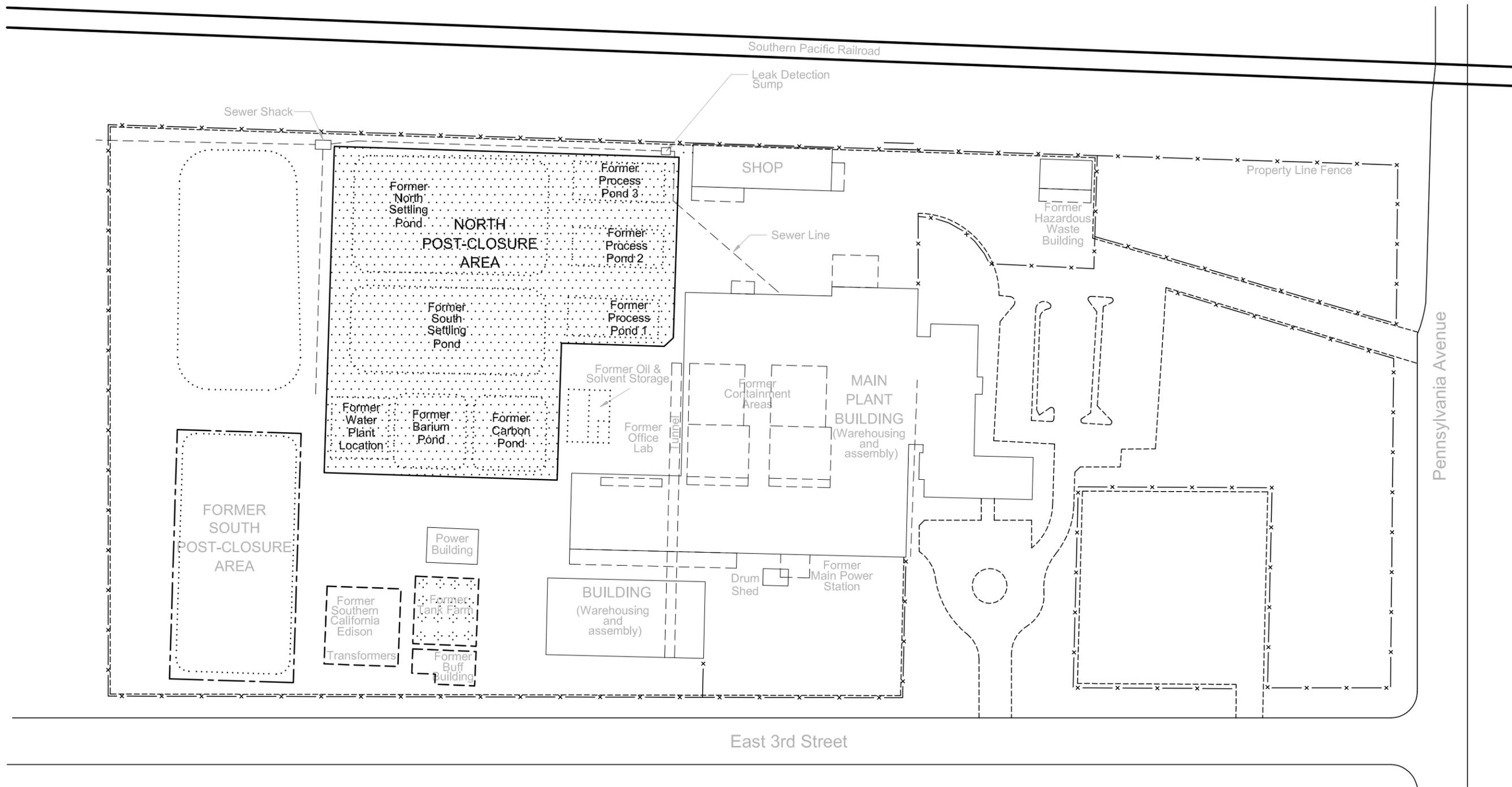
LOCATION OF FORMER FACILITY STRUCTURES & SETTLING PONDS



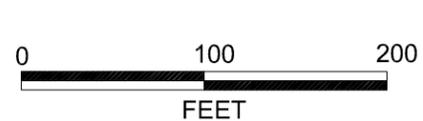
Project No.:	Date:	Project:	Figure
29864170	OCTOBER 2007	POST-CLOSURE PERMIT RENEWAL APPLICATION NORTH POST-CLOSURE AREA 1060 EAST 3RD STREET BEAUMONT, CALIFORNIA SQUARE D COMPANY	B-1

DRAWING: I:\2986417007 - Square D Company\September 2007\Figure B-1_Location of Former Facility Structures.dwg





LOCATION OF NORTH POST-CLOSURE AREA



Project No.:	Date:	Project:	Figure
29864170	OCTOBER 2007	POST-CLOSURE PERMIT RENEWAL APPLICATION NORTH POST-CLOSURE AREA 1060 EAST 3RD STREET BEAUMONT, CALIFORNIA SQUARE D COMPANY	B-2

DRAWING: I:\2986417007 - Square D Company\September 2007\Figure B-2_Location of North Post Closure Area.dwg



0 50 100
Feet



Aerial Photograph of Site

Project No.: 29864170

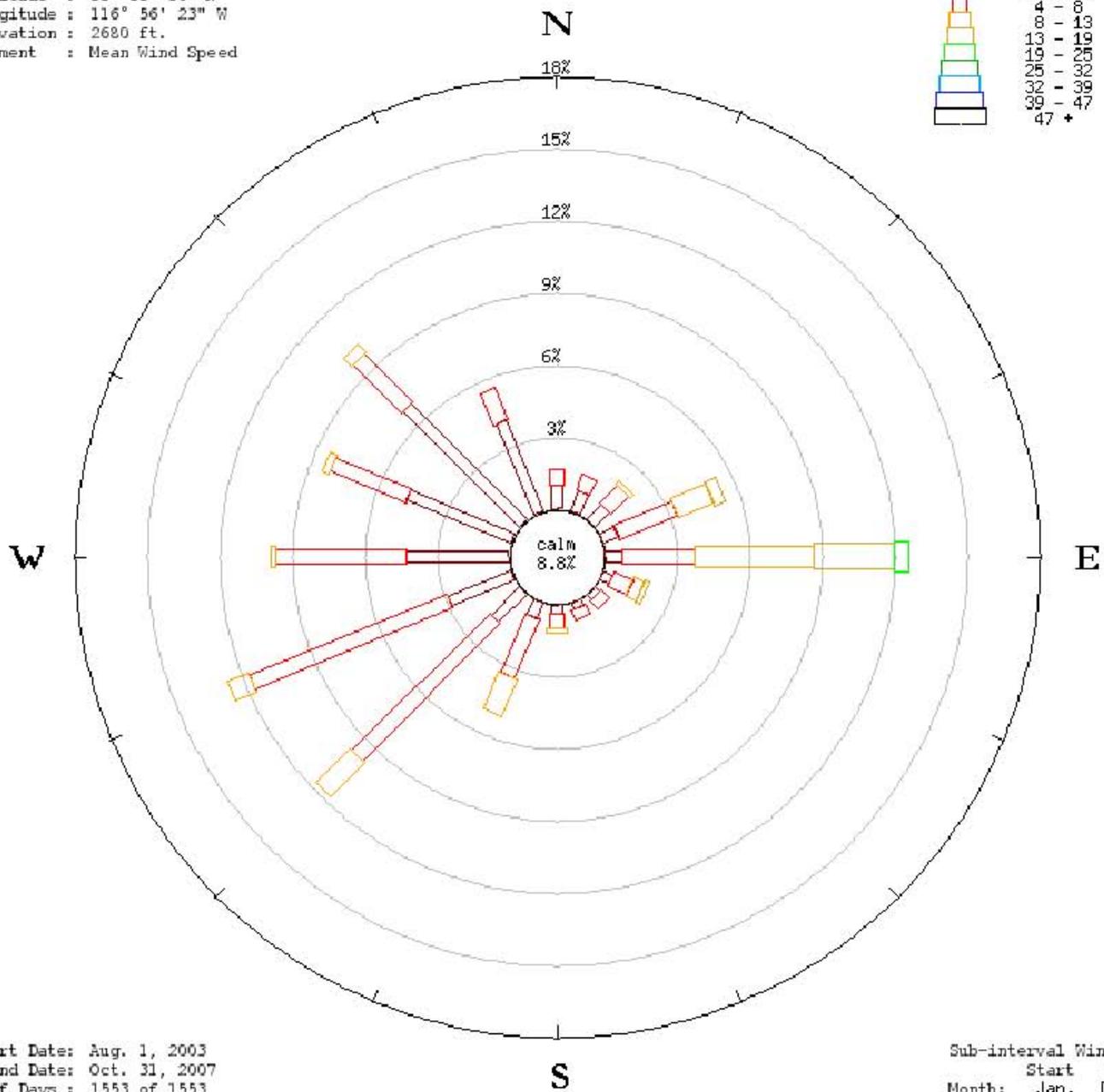
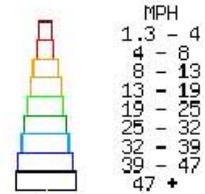
Date: OCTOBER 2007

Project:

POST-CLOSURE PERMIT RENEWAL APPLICATION
NORTH-POST CLOSURE AREA
SQUARE D COMPANY
1060 EAST 3RD ST., BEAUMONT, CA

Figure B-3

Station : Beaumont California
 Latitude : 33° 55' 50" N
 Longitude : 116° 56' 23" W
 Elevation : 2680 ft.
 Element : Mean Wind Speed



Start Date: Aug. 1, 2003
 End Date: Oct. 31, 2007
 # of Days : 1553 of 1553
 # obs:poss: 36431 of 37272

Sub-interval Windows
 Start End
 Month: Jan. Dec.
 Day: 01 31
 Hour: 00 23

© Western Regional Climate Center

WIND ROSE FOR BEAUMONT, CALIFORNIA

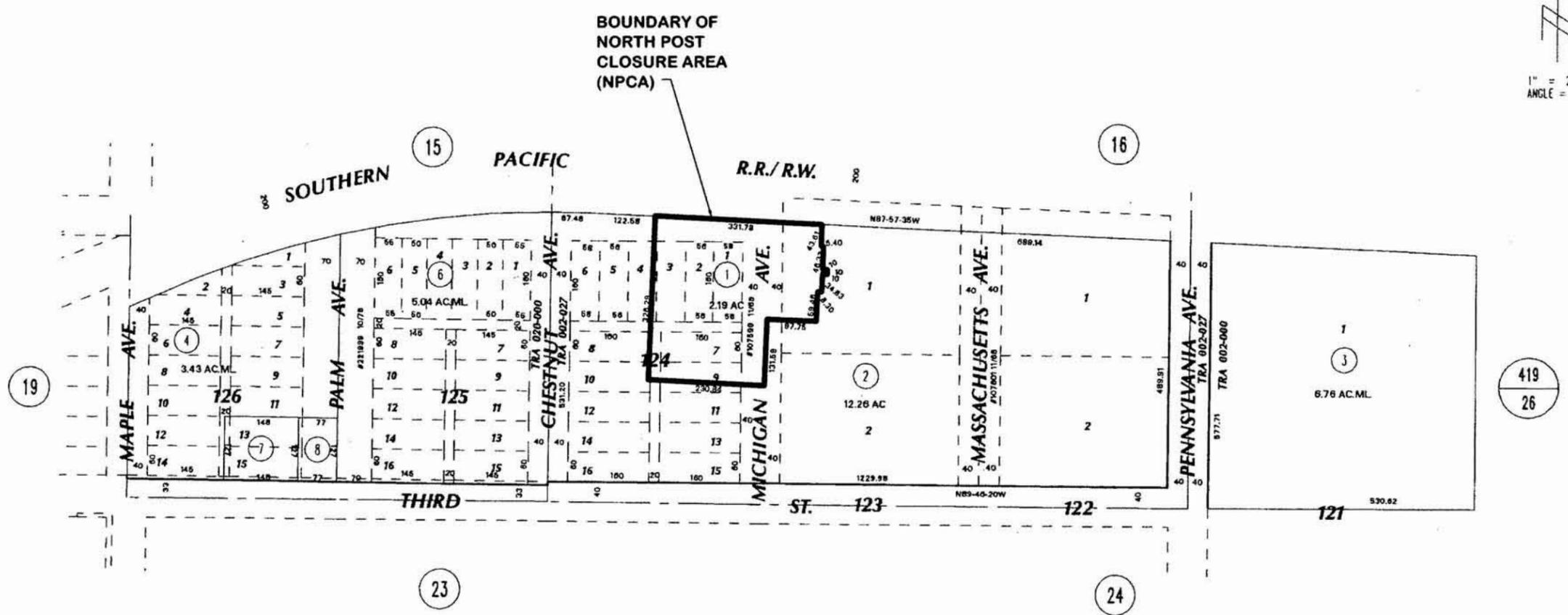
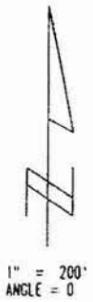
Project No.: 29864170	Date: OCTOBER 2007	Project: POST-CLOSURE PERMIT RENEWAL APPLICATION SQUARE D COMPANY NORTH POST-CLOSURE AREA 1060 EAST 3RD STREET BEAUMONT, CALIFORNIA	Figure B-6
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THIS MAP WAS PREPARED FOR ASSESSMENT PURPOSES ONLY. NO LIABILITY IS ASSUMED FOR THE ACCURACY OF THE DATA SHOWN. ASSESSOR'S PARCEL MAY NOT COMPLY WITH LOCAL LOT-SPLIT OR BUILDING SITE ORDINANCES.

POR. SEC 10 T.3S., R.1W
CITY OF BEAUMONT

T.R.A. 002-000
002-027

418-36
15-19



DATA: 467/434 O.R. OF 6-28-40

WB 6/16-17 SB TOWN OF BEAUMONT AMENDED MAP

ASSESSOR'S MAP BK418 PG.36
Riverside County, Calif. *RLJ*

Aug 2002

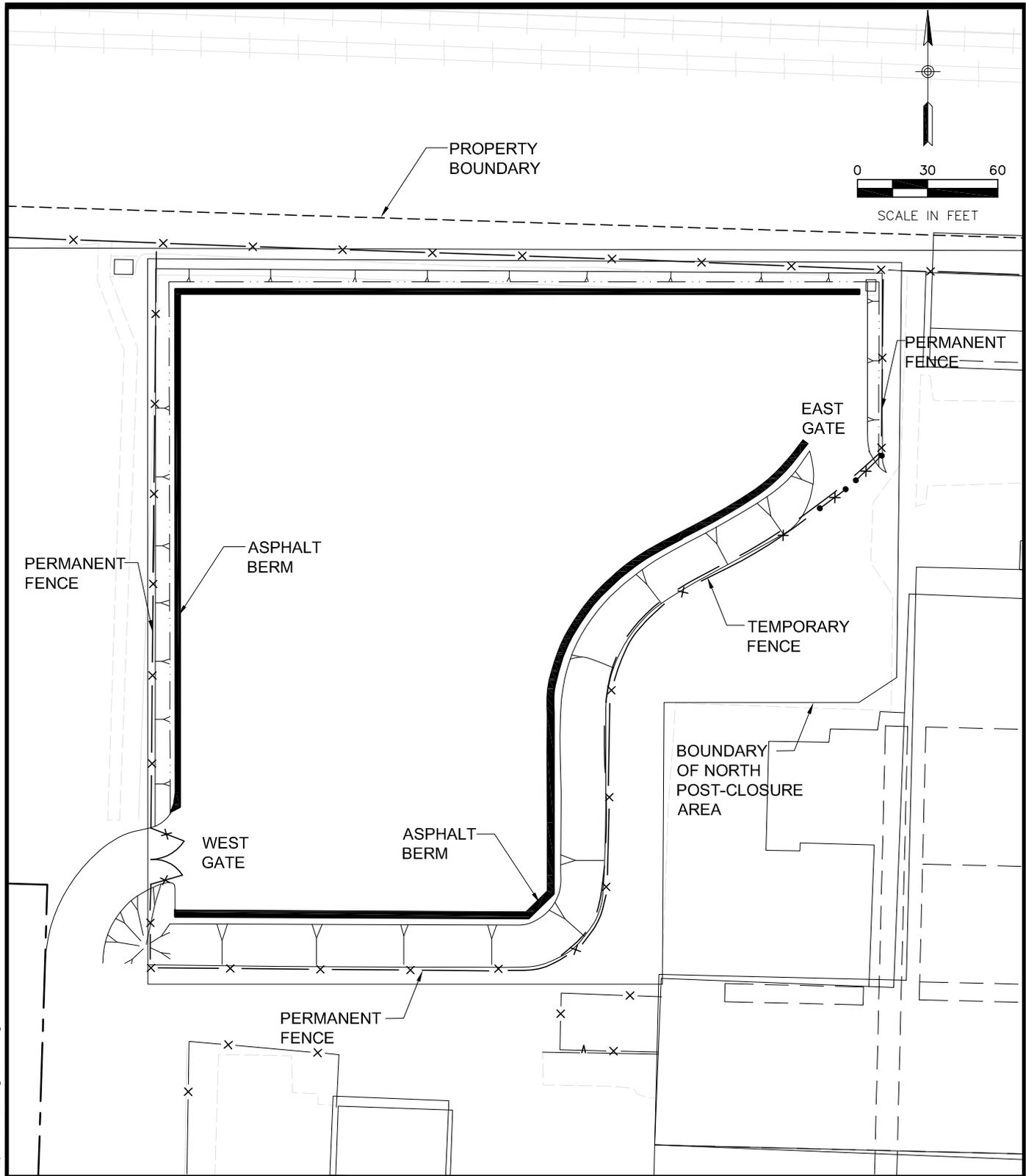
DATE	OLD NUMBER	NEW NUMBER
06/02	5	7.8

NPCA PARCEL MAP

Project No.: 29864170	Date: FEBRUARY 2008	Project: POST-CLOSURE PERMIT RENEWAL APPLICATION SQUARE D COMPANY NORTH POST-CLOSURE AREA 1060 EAST 3RD STREET BEAUMONT, CALIFORNIA	Figure B-7
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DRAWING: Z:\29864170 - Square D\Draft\Figures\Figure B-7_NPCA Parcel Map.dwg





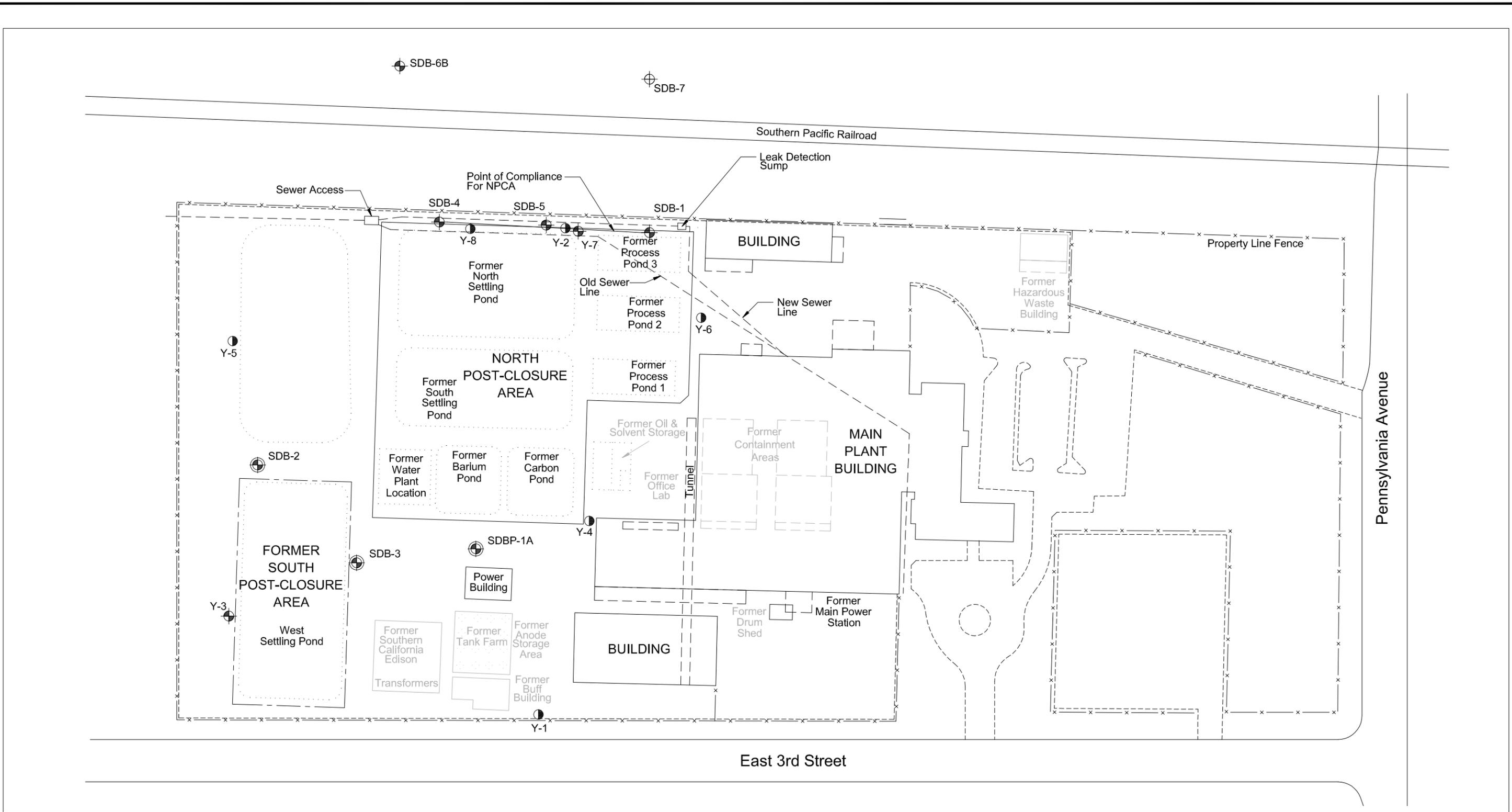
NPCA SECURITY AND ACCESS CONTROL

Project No.:	Date:	Project:	Figure
29864170	OCTOBER 2007	POST-CLOSURE PERMIT RENEWAL APPLICATION NORTH POST-CLOSURE AREA SQUARE D COMPANY 1060 EAST 3RD STREET BEAUMONT, CALIFORNIA	B-8

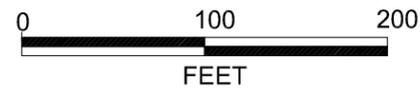
DRAWING: I:\29864170\07 - Square D Company\September, 2007\Figure B-8.dwg



I:\29864170.07 - Square D Company\September 2007\Figure B-9_Monitoring Well Locations.dwg, File date: 10/31/2007 9:13 AM, Print date: 11/17/2007 11:07 AM, by: Daniel Navarrete



Explanation:	
	Current Groundwater Monitoring System Well
	Piezometer (or Monitoring Well) for Groundwater Elevations Only
	Groundwater Monitoring Well Scheduled for Decommissioning
	Approximate Location of Proposed Offsite Well SDB-7



MONITORING WELL LOCATION MAP			
Project No.:	Date:	Project:	Figure:
29864170	OCTOBER 2007	POST CLOSURE PERMIT RENEWAL APPLICATION SQUARE D COMPANY NORTH POST-CLOSURE AREA 1060 EAST 3RD STREET BEAUMONT, CALIFORNIA	B-9

