

## DEPARTMENT OF HEALTH SERVICES

714/744 P STREET  
SACRAMENTO, CA 95814N00236.000176  
ALAMEDA POINT  
SSIC NO. 5090.3

Dear Sir:

The California Department of Health Services, Hazardous Materials Management Section, is conducting a statewide survey to locate inactive or abandoned chemical waste disposal sites pursuant to Section 25170(a) and 25170(d) of the California Health and Safety Code (enclosed). As a part of this survey effort, we request your assistance in completing a short questionnaire regarding the past chemical waste disposal practices of your company.

Although many past chemical waste disposal practices were in compliance with appropriate regulations at the time, we have since learned that more effective practices are required to adequately protect public health and the environment. In addition, in some locations industrial facilities or local industrial disposal areas have been phased out and gradually replaced, through zoning changes, by public or residential use. We need to locate these areas, as well as all inactive industrial disposal areas, to assure that waste in these areas does not pose a hazard now or in the future. Of course, the earlier a potential problem is identified, the easier the solution is to implement. Your assistance in this effort will be very helpful. Your response to the questionnaire will be used to determine whether we should further evaluate your on-site disposal practices.

The confidentiality of information you supply can be protected as authorized by the trade secret provisions of State law (See Government Code Section 6250 et seq and Health and Safety Code Section 25173, enclosed.) If you wish to have your questionnaire responses protected, please indicate this in the space provided on the questionnaire. If you have any questions about the project or about responses to this questionnaire, please call (916) 323-3559. Please return the completed questionnaire in the enclosed stamped reply envelope within 30 days following the date of this letter.

Sincerely,

A handwritten signature in cursive script that reads "Harvey F. Collins".

Harvey F. Collins, Ph.D., Chief  
Hazardous Materials Management Section

Enclosures

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### ABANDONED CHEMICAL WASTE DISPOSAL SITE SURVEY

We are conducting a survey to locate abandoned and/or inactive chemical waste disposal sites in California. As part of this effort, we are contacting all currently operating industries which could produce chemical wastes to determine both current and past chemical waste disposal practices.

Below is a survey form to help collect information which will be used to locate and evaluate disposal sites. Your cooperation in completing this form is appreciated. If you are completing this for several plants, please use a separate form for each plant your company has operated and/or currently operates in California. If you do not have adequate space, please use another sheet of paper and identify responses by the question number.

Please return the completed survey form by APR 25 1980

If you have any questions, please call or write to the Department of Health Services, Hazardous Materials Management Section, 744 P Street, Sacramento, CA 95814, (916) 323-3559. If necessary, trade secrets may be protected by indicating the number of the response you wish to remain confidential; \_\_\_\_\_

1. Company Name \_\_\_\_\_

Mailing Address \_\_\_\_\_

Number Street

\_\_\_\_\_

City Zip

Location (if different than above) \_\_\_\_\_

Number Street

\_\_\_\_\_

City County Zip

2. Years of operation at this location \_\_\_\_\_

3. If a subsidiary, name and mailing address of parent company

\_\_\_\_\_

Name Number Street

\_\_\_\_\_

City State Zip

4. List Standard Industrial Classification (SIC) codes for principle products

Product	SIC Code	Percent of Production

5. Do you have Waste Discharge Requirements issued by a Regional Water Quality Control Board for any on-site disposal?  
 Yes     No

If yes, date you received the requirements \_\_\_\_\_

Were your disposal practices any different before receiving the Discharge Requirements?     Yes     No

If yes, explain \_\_\_\_\_

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6. Please complete for all major chemical wastes produced at this plant. Using the key below, indicate method of disposal used for each chemical and whether disposed of on or off site. If you have submitted an application for a Hazardous Waste Facility Permit, indicate the submittal date under the section titled Current Disposal Practices and do not complete that section. If you have not submitted an application for a Hazardous Waste Facility Permit, please complete the section. If you would like information about the Hazardous Waste Facility permitting program, please check here.

- KEY:      A – on site disposal      B – off site disposal
- |                  |                                       |                   |                |
|------------------|---------------------------------------|-------------------|----------------|
| 1 – Recycling    | 4 – Containerized for storage/transit | 7 – Land disposal | 10 – Well      |
| 2 – Treatment    | 5 – Pour down sewer/storm drain       | 8 – Ponds         | 11 – Mineshaft |
| 3 – Incineration | 6 – Injection well                    | 9 – Pits          | 12 – Unknown   |

Name/Type of Chemical	Disposal Method	
	Pre-1972 Disposal Practices	Current Disposal Practices

7. Please complete for any wastes disposed of off site before 1972.

Location of Site	Name of Hauler	Approximate Time Period Site Used

8. Are there any inactive chemical waste disposal sites on the plant property?  Yes     No     Unknown

- If yes, indicate type(s) of disposal site(s).
- |                                      |   |                                    |  |
|--------------------------------------|---|------------------------------------|--|
| <input type="checkbox"/> Incinerator | <input type="checkbox"/> Ponds          | <input type="checkbox"/> Pits      | <input type="checkbox"/> Well          |
| <input type="checkbox"/> Containers  | <input type="checkbox"/> Injection Well | <input type="checkbox"/> Mineshaft | <input type="checkbox"/> Land Disposal |

9. List names and location of any other plants your company operates or has operated in California since 1945.

Name	Location

Survey completed by: \_\_\_\_\_ Title \_\_\_\_\_

Phone: (    ) \_\_\_\_\_

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Provisions of the California  
Health and Safety Code  
Related to the  
Abandoned Chemical Waste Disposal Site Survey

Section 25170(a) and 25170(d)

25170. The department in performing its duties under this chapter shall:

(a) Coordinate research and development regarding methods of hazardous waste handling, storage, use, processing, and disposal and may conduct appropriate studies relating to hazardous wastes.

(d) Provide for appropriate surveillance of hazardous waste processing, use, handling, storage, and disposal practices in the state.

Provisions of California Law Relating to  
Protection of Trade Secrets

Health and Safety Code Section 25173

25173. The department shall establish procedures to insure that trade secrets used by a person regarding methods of hazardous waste handling and disposal are utilized by the director, the department, or any authorized representative of the department only in connection with the responsibilities of the department pursuant to this chapter and that such trade secrets are not otherwise disseminated by the director, the department, or any authorized representative of the department without the consent of the person. "Trade secrets," as used in this section, may include, but are not limited to, any formula, plan, pattern, process, tool, mechanism, compound, procedure, production data, or compilation of information which is not patented, which is known only to certain individuals within a commercial concern who are using it to fabricate, produce, or compound an article of trade or a service having commercial value, and which gives its user an opportunity to obtain a business advantage over competitors who do not know or use it.

Government Code Section 6254.7

6254.7. (a) All information, analyses, plans, or specifications that disclose the nature, extent, quantity, or degree of air contaminants or other pollution which any article, machine, equipment, or other contrivance will produce, which any air pollution control district or any other state or local agency or district requires any applicant to provide before such applicant builds, erects, alters, replaces, operates, sells, rents, or uses such article, machine, equipment, or other contrivance, are public records.

(b) All air or other pollution monitoring data, including data compiled from stationary sources, are public records.

(c) All records of notices and orders directed to the owner of any building of violations of housing or building codes, ordinances, statutes, or regulations which constitute violations of standards provided in Section 1941.1 of the Civil Code, and records of subsequent action with respect to such notices and orders, are public records.

(d) Except as otherwise provided in subdivision (e), trade secrets are not public records under this section. "Trade secrets," as used in this section, may include, but are not limited to, any formula, plan, pattern, process, tool, mechanism, compound, procedure, production data, or compilation of information which is not patented, which is known only to certain individuals within a commercial concern who are using it to fabricate, produce, or compound an article of trade or a service having commercial value and which gives its user an opportunity to obtain a business advantage over competitors who do not know or use it.

(e) Notwithstanding any other provision of law, all air pollution emission data, including those emission data which constitute trade secrets as defined in subdivision (d), are public records. Data used to calculate emission data are not emission data for the purposes of this subdivision and data which constitute trade secrets and which are used to calculate emission data are not public records.