



## Department of Toxic Substances Control

Barbara A. Lee, Director  
9211 Oakdale Avenue  
Chatsworth, California 91311

### SUMMARY OF VIOLATIONS

On June 23 & 24, 2015, the Department of Toxic Substances Control (DTSC), California Environmental Protection Agency, conducted an inspection at:

<b>Facility Name:</b>	Quemetco, Inc.
<b>Facility Address:</b>	720 South 7 <sup>th</sup> Avenue
	City of Industry, California 91746
<b>EPA ID Number:</b>	CAD 066 233 966
<b>County:</b>	Los Angeles

As a result of this inspection, violations of hazardous waste laws, regulations, and requirements listed on the attached pages were discovered. All violations must be corrected; the actions you must take to correct the violations are listed with each violation. If you disagree with any of the violations or proposed corrective actions listed in this Summary of Violations, you should inform DTSC. Additional violations may be found after the site visit, and these will be identified in the Violation section of the inspection report.

DTSC will provide you a complete inspection report within 65 days of the date of this inspection. You may request a meeting with DTSC to discuss the inspection, inspection report, or the Summary of Violations. The issuance of this Summary of Violations does not preclude DTSC from taking administrative, civil, or criminal action as a result of the violations noted in the Summary of Violations or violations that have not been corrected within the time provided. A false statement that compliance has been achieved is a violation of the law and punishable by a fine of not less than \$2,000 or more than \$25,000 for each occurrence. DTSC may re-inspect this facility at any time.

Company Representative Accepting Summary

DTSC Representative

Name: JUN LAUDENCA

Name: Theodore Johnson / Brian Wu

Signature: [Handwritten Signature] Original signed

Signature: [Handwritten Signature] Original signed

Title: ETS COMPLIANCE MGR

Title: Senior Engineering Geologist / Environmental Scientist

Date: 8/1/15

Date: 08-05-2015



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### SUMMARY OF VIOLATIONS

Facility Name: Quemetco, Inc.

Date: 06/23, 24/15

#### SECTION I: NON - MINOR VIOLATIONS AND REQUIRED CORRECTIVE ACTION (Violations not considered Minor Violations)

You must correct the following violation(s) within the specified time frame for each violation.

**1. Failure to maintain the integrity of the monitoring well bore hole**

Quemetco, Inc. violated Health & Safety Code 25202, California Code of Regulations, title 22, section 66264.97(b)(4), and its Hazardous Waste Facility Operation and Post Closure Permit dated September 15, 2005, in that on or about June 23, 2015 the Facility failed to maintain the integrity of the monitoring well bore hole and prevent the bore hole from acting as a conduit for contaminant transport. DTSC observed the following:

- a. Monitoring well MW-1 contained liquid inside the flush mounted protective wellbox. This was immediately observed upon opening of the wellbox.
- b. Metal corrosion was observed on the monitoring well protective standpipe of monitoring well MW-17. The metal corrosion was observed near the intersection of the standpipe and the paved surface.

**Corrective Action:**

Within 30 days from the date of this Summary of Violation, Quemetco, Inc. shall maintain the integrity of the monitoring well bore hole and prevent the bore hole from acting as a conduit for contaminant transport. Specifically, Quemetco, Inc. shall:

- a. Ensure that any monitoring well maintenance issues (e.g. liquid observed within a wellbox, deteriorating gaskets) observed during well maintenance inspections are remedied immediately and that all inspections and remedies performed are documented pursuant to the Facility's approved Sampling Analysis Plan dated May 12, 2011. Quemetco, Inc. shall ensure that prior to sampling any groundwater monitoring well, any liquid observed within a wellbox is removed.
- b. Ensure that immediate action is taken to repair any groundwater monitoring well which shows sign of metal corrosion on the protective well stand pipe. Quemetco, Inc. shall submit to DTSC a description of the repairs made to monitoring well MW-17 along with photographs which document the repair.



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# SUMMARY OF VIOLATIONS

Facility Name: Quemetco, Inc. Date: 06/23/2015

## Continuation Sheet for SECTION I : NON-MINOR VIOLATIONS AND REQUIRED CORRECTIVE ACTION

### 2. Failure to include and implement consistent sampling and analytical procedures designed to ensure monitoring results

Quemetco, Inc. violated Health & Safety Code 25202, California Code of Regulations, title 22, section 66264.97(e)(4) and its Hazardous Waste Facility Operation and Post Closure Permit dated September 15, 2005, in that on or about June 23, 2015 the Facility failed to include and implement consistent sampling and analytical procedures designed to ensure monitoring results provide a reliable indication of water quality at all monitoring points and background monitoring points. DTSC observed that Quemetco, Inc. failed to implement the procedures outlined in its approved Sampling Analysis Plan (SAP) dated May 12, 2011 as follows:

- a. When utilizing a bailer to purge groundwater from monitoring well MW-7, Quemetco, Inc. allowed the bailer to rapidly descend into the well water of monitoring well MW-7 rather than lowering the bailer slowly into the well to prevent surging of the well, in accordance with the SAP dated May 12, 2011, Section 4.6, Page 12, Paragraph 1 and Appendix G, Section G-9, Paragraph 2.
- b. Quemetco, Inc. did not record field stability parameters during and after the groundwater monitoring samples were collected from monitoring wells MW-7, MW-9 and MW-10, in accordance with the SAP dated May 12, 2011, Appendix G, Section G-10.
- c. Quemetco, Inc. failed to properly label sampling containers with the required information (e.g. facility name) in accordance with the SAP dated May 12, 2011 Appendix G, Section G-8.
- d. Quemetco, Inc. failed to perform multiple groundwater surface elevation measurements, at each groundwater monitoring well location, to ensure repeatability of the measurement in accordance with the SAP dated May 12, 2011 SAP, Appendix E, Paragraph 5.



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Date: 06/23/2015

## Continuation Sheet for SECTION I : NON-MINOR VIOLATIONS AND REQUIRED CORRECTIVE ACTION

**2.** Failure to include and implement consistent sampling and analytical procedures designed to ensure monitoring results

### Corrective Action:

Effective immediately, Quemetco, Inc. shall implement the procedures outlined in its approved Sampling Analysis Plan dated May 12, 2011. Quemetco, Inc. shall:

- a. Ensure to take the steps necessary to prevent surging of a monitoring well when sampling. Specifically, ensure that the bailer utilized during sampling is not allowed to descend rapidly into the groundwater when purging groundwater from the well.
- b. Ensure that all field stability parameters are collected and recorded during and after groundwater sampling.
- c. Ensure that sample containers are properly labelled with the required information.
- d. Ensure multiple groundwater surface elevation measurements are taken at each groundwater monitoring well location, to ensure repeatability of the measurement.



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### SUMMARY OF VIOLATIONS

Facility Name: Quemetco, Inc.

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### Continuation Sheet for SECTION I : NON-MINOR VIOLATIONS AND REQUIRED CORRECTIVE ACTION

**3. Failure to include an accurate determination of the groundwater surface elevation at each well**

Quemetco, Inc. violated Health & Safety Code 25202, California Code of Regulations, title 22, section 66264.97(e)(13) and its Hazardous Waste Facility Operation and Post Closure Permit dated September 15, 2005, in that on or about June 23, 2015 the Facility failed to include an accurate determination of the groundwater surface elevation at each well each time groundwater is sampled. DTSC observed that groundwater monitoring wells MW-5, MW-7, MW-9, MW-10, MW-11, MW-13, MW-16, MW-18, MW-19, and MW-20, displayed more than one survey location or marking on the groundwater monitoring well casing. Multiple black markings and or notches on the top of the well casings were observed

**Corrective Action:**

Within 60 days from the date of this Summary of Violation, Quemetco, Inc. shall:  
a) standardize the survey point of measurement on the top of each monitoring well casing, so as to make the survey point unambiguous and ensure that an accurate determination of the groundwater surface elevation is obtained at each well each time groundwater is sampled; and b) submit to DTSC a description with photographs of the corrections made to all the groundwater monitoring wells to standardize the survey point of measurement.



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# SUMMARY OF VIOLATIONS

Facility Name: Quemetco, Inc.

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## Continuation Sheet for SECTION I : NON-MINOR VIOLATIONS AND REQUIRED CORRECTIVE ACTION

**4. Failure to prevent the downward entry of water into the closed landfill, failed to maintain the integrity and effectiveness of the final cover, and to prevent run-on and run-off from eroding or otherwise damaging the final cover.**

4a. Quemetco, Inc. violated Health & Safety Code 25202, California Code of Regulations, title 22, section 66264.310(a)(1), its Hazardous Waste Facility Operation and Post Closure Permit dated September 15, 2005, in that on or about June 23, 2015 the Facility failed to prevent the downward entry of water into the closed landfill, identified as the Former Raw Materials Storage Area. A saw cut was observed on the post closure final cover of the Former Raw Materials Storage Area. The saw cut was observed to run the entire length of the post closure cover which compromises the prevention of the downward entry of water into the closed landfill and enhances the infiltration and erosion potential. Run-off water from the Facility's cooling towers was observed to be continuously flowing over and ponding over the saw cut of the post-closure final cover.

4b. Quemetco, Inc. violated Health & Safety Code 25202, California Code of Regulations, title 22, section 66264.310(b)(1), its Hazardous Waste Facility Operation and Post Closure Permit dated September 15, 2005, in that on or about June 23, 2015 the Facility failed to maintain the integrity and effectiveness of the final cover of the Former Raw Materials Storage Area by creating a saw cut into the final cover. The saw cut was observed to run the entire length of the post closure cover.

4c. Quemetco, Inc. violated Health & Safety Code 25202, California Code of Regulations, title 22, section 66264.310(b)(4), its Hazardous Waste Facility Operation and Post Closure Permit dated September 15, 2005, in that on or about June 23, 2015 the Facility failed to prevent run-on and run-off from eroding or otherwise damaging the final cover of the Former Raw Materials Storage Area. Run-off water from the Facility's cooling towers was observed to be continuously flowing over the saw cut of the post-closure final cover.



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# SUMMARY OF VIOLATIONS

Facility Name: Quemetco, Inc. Date: 06/23/2015

## Continuation Sheet for SECTION I : NON-MINOR VIOLATIONS AND REQUIRED CORRECTIVE ACTION

4. **Failure to prevent the downward entry of water into the closed landfill, failed to maintain the integrity and effectiveness of the final cover, and to prevent run-on and run-off from eroding or otherwise damaging the final cover.**

**Corrective Action:**

1. Effective immediately, ~~Effective immediately~~, Quemetco, Inc. shall implement interim measures to prevent the run-off from the Facility's cooling tower from flowing over the post closure final cover.
2. Within 10 days of the effective date of this Summary of Violation, Quemetco, Inc. shall submit documentation to DTSC for the following:
  - 2a. A detailed explanation of the saw cut which was observed on the post closure final cover.
  - 2b. A description of the interim measures implemented to prevent the run-off from the Facility's cooling tower from flowing over the post closure final cover.
3. Within 60 days from the date of this Summary of Violation, Quemetco, Inc. shall submit to the Department for review and approval, a plan to permanently prevent the run-off from the cooling towers from flowing over the post closure final cover of the Former Raw Materials Storage Area. The plan at a minimum shall include an explanation of any type of diversion system Quemetco, Inc. proposes to implement.



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#### SECTION IV: OTHER ISSUES/CONCERNS

The following issue/concern was identified during this inspection. Further research may identify additional violations. Any new violations, with the required corrective action and compliance schedule, will be identified in the Violation section of the inspection report.

1. Availability and review of the Operating Records, specifically groundwater quarterly and annual reports for the years prior to 2007.
2. Availability and review of documentation and or survey well video provided by Quemetco, Inc. on the current conditions of the polyvinyl chloride (PVC) well casing of monitoring wells MW-10, MW-12, and MW-17. These ground water monitoring wells were observed to be leaning against or at an angle toward the interior of the well protective standpipe. It is unknown if the integrity of the PVC well casing or construction materials has been compromised.
3. In order to complete this Groundwater Monitoring Evaluation inspection, Quemetco, Inc. is to prepare a hydrogeology presentation which will be presented to and evaluated by DTSC. On June 23, 2015 Quemetco, Inc. was provided with an outline of what, at a minimum, should be included in the hydrogeology presentation. Quemetco, Inc. will coordinate with DTSC by ~~July 30, 2015~~ to develop the timeline for the hydrogeology presentation.

*August 14, 2015*