



## Department of Toxic Substances Control

**Matthew Rodriguez**  
Secretary for  
Environmental Protection

Deborah O. Raphael, Director  
1515 Tollhouse Road  
Clovis, California 93611

**Edmund G. Brown Jr.**  
Governor

October 22, 2012

Mr. Robert Henry  
Senior District Manager  
Chemical Waste Management, Incorporated  
Kettleman Hills Facility  
35251 Old Skyline Road  
Kettleman City, California 93239

Certified # 70091680000207249957

Dear Mr. Henry:

On June 29, 2012, the California Department of Toxic Substances Control (Department) issued an Information Request to Chemical Waste Management, Incorporated, Kettleman Hills Facility (CWM-KHF). The Department requested copies of reports for releases of hazardous waste and/or hazardous constituents and related documents that occurred between July 1, 2008 and June 29, 2012.

On July 27, 2012, CWM-KHF provided records in response to the Department's Information Request. Based upon the Department's review of these records, CWM-KHF failed to report releases of a hazardous waste and/or hazardous constituents to the Department verbally within 24 hours and in writing within 10 days of such discovery as required by CWM-KHF's 2003 Hazardous Waste Facility Permit, Part VI(1), Attachment A. The report to the Department must summarize the immediacy and magnitude of any potential threat to human health and/or the environment.

The violations by CWM-KHF are described in the enclosed Summary of Violations. The issuance of this letter does not preclude the Department from taking administrative, civil, or criminal action as a result of violations noted in the Summary of Violations.

The Summary of Violations will become a public document. You may request that any trade secret or facility security information be withheld from public disclosure. (See Health and Safety Code Section 25173). If you wish to assert the trade secret privilege for any information contained in the Summary of Violations, please provide specific answers to each of the following questions, for each item of concern, within 10 days of receipt of this letter:

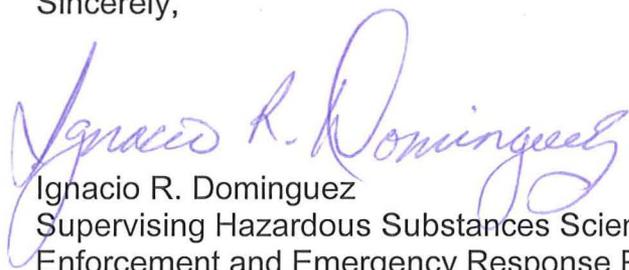
Mr. Robert Henry  
October 22, 2012  
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1. To what extent is there knowledge of the information conveyed by the photograph/document outside your business?
2. To what extent is there knowledge of the information conveyed by the photograph/document, by employees and others in your business?
3. To what extent have measures been taken to guard the secrecy of the information?
4. Is the information valuable to competitors? If so, why?
5. Has there been substantial monetary expenditure in the development of the information?
6. Could the information be easily and properly acquired or duplicated by others?

The Department will review your response for each item of concern to determine if the information in question should be treated as a trade secret and notify you accordingly.

If you have any questions regarding this letter or if you wish to meet with the Department to discuss any questions or concerns you may have regarding the Summary of Violations, please call me at (559) 297-3959.

Sincerely,



Ignacio R. Dominguez  
Supervising Hazardous Substances Scientist I  
Enforcement and Emergency Response Program

Enclosure



*Matthew Rodriguez*  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

Deborah O. Raphael, Director  
1515 Tollhouse Road  
Clovis, California 93611



*Edmund G. Brown Jr.*  
Governor

# SUMMARY OF VIOLATIONS

On April 9-10 and 12-13, 2012, the Department of Toxic Substances Control (DTSC), California Environmental Protection Agency, conducted an inspection at:

**Facility Name:** Chemical Waste Management – Kettleman Hills (CWM-KHF)

**Facility Address:** 35251 Old Skyline Road  
P.O. Box 471  
Kettleman City, CA 93239

**EPA ID Number:** CAT 000646117 **County:** Kings County

As a result of this inspection and information collected pursuant to an information request letter issued to CWM-KHF by DTSC on June 29, 2012 pertaining to “spill/release report” documents, 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.

SUMMARY OF VIOLATIONS  
CHEMICAL WASTE MANAGEMENT – KETTLEMAN HILLS  
October 22, 2012

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Company Representative Accepting Summary

DTSC Representative

Name \_\_\_\_\_

Name IGNACIO R. DOMINGUEZ

Signature \_\_\_\_\_

Signature 

Title \_\_\_\_\_

Title Supervising HSSI

Date \_\_\_\_\_

Date 10/22/12

# Department of Toxic Substances Control

1515 Tollhouse Road  
Clovis, California 93611

## SUMMARY OF VIOLATIONS

**Facility Name:** Chemical Waste Management Inc. – Kettleman Hills Facility

**Date:** October 22, 2012

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

Chemical Waste Management, Inc. (CWM) violated Health and Safety Code section 25202 subdivision (a); California Code of Regulations, title 22, section 66270.30, subdivision (a); and Part VI (Corrective Action) of the Hazardous Waste Facility Permit issued to CWM, in that on several occasions CWM failed to report the discovery of releases of a hazardous waste/hazardous constituent to DTSC orally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment to wit:

1. On or about August 7, 2008, approximately 2 quarts of contaminated soil were spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as a "Non-RCRA hazardous waste". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
2. On or about October 10, 2008, approximately 2 quarts of sand blast grit were spilled in the vicinity of the closed B 15 landfill according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as a "hazardous waste - solid". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
3. On or about October 20, 2008, approximately 5 gallons of fluorochemicals were spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as a "Non-RCRA hazardous waste-liquid". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
4. On or about November 14, 2008, approximately 1 gallon of fertilizers/herbicides was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as

a "Non-RCRA hazardous waste-solid". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.

5. On or about January 12, 2009, approximately 1 quart of polychlorinated biphenols (PCBs) was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as a "PCB". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
6. On or about January 26, 2009, approximately ½ pound of sulfur tank bottoms was spilled in the vicinity of the closed B 15 landfill according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as a "Waste Sulfur". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
7. On or about January 27, 2009, approximately 1 gallon of solidified fuel oil was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as a "Non-RCRA hazardous waste". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
8. On or about January 27, 2009, approximately 1 gallon of drill cuttings/asbestos was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as a "Non-RCRA hazardous waste". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
9. On or about February 3, 2009 (5:05 pm), approximately ½ gallon of sump material/PCB was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as a "PCB solid". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
10. On or about February 3, 2009 (11:40 am), approximately 1 gallon of sump material/PCB was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as a "PCB solid". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.

11. On or about February 3, 2009 (5:30 pm), approximately ½ gallon of sump material/PCB was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as a "PCB solid". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
12. On or about March 3, 2009 (approx. 2:00 pm), approximately 1 gallon of lead-containing soil was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as an "Environmentally Hazardous Substances - solid". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
13. On or about March 3, 2009 (approx. 2:00 pm), approximately 1 gallon of lead-containing soil was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as an "Environmentally Hazardous Substances - solid". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
14. On or about March 3, 2009 (approx. 2:00 pm), approximately 1 gallon of lead-containing soil was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as an "Environmentally Hazardous Substances - solid". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
15. On or about March 3, 2009 (approx. 2:00 pm), approximately 1 gallon of lead-containing soil was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as an "Environmentally Hazardous Substances - solid". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
16. On or about March 3, 2009 (approx. 3:00 pm), approximately 1 gallon of lead-containing soil was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as an "Environmentally Hazardous Substances - solid". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
17. On or about March 3, 2009 (approx. 4:00 pm), approximately 1 gallon of lead-containing soil was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as an "Environmentally Hazardous Substances - solid". CWM failed to report the

discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.

18. On or about March 3, 2009 (approx. 5:00 pm), approximately 1 gallon of lead-containing soil was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as an "Environmentally Hazardous Substances - solid". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
19. On or about March 3, 2009 (approx. 5:00 pm), approximately 1 gallon of lead-containing soil was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as an "Environmentally Hazardous Substances - solid". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
20. On or about March 3, 2009 (approx. 5:00 pm), approximately 1 gallon of lead-containing soil was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as an "Environmentally Hazardous Substances - solid". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
21. On or about March 3, 2009 (approx. 5:00 pm), approximately 1 gallon of lead-containing soil was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as an "Environmentally Hazardous Substances - solid". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
22. On or about March 3, 2009 (approx. 5:00 pm), approximately 1 gallon of lead-containing soil was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as an "Environmentally Hazardous Substances - solid". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
23. On or about March 3, 2009 (approx. 5:00pm), approximately 1 gallon of lead-containing soil was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as an "Environmentally Hazardous Substances - solid". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.

24. On or about March 3, 2009 (approx. 5:00 pm), approximately 1 gallon of lead-containing soil was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as an "Environmentally Hazardous Substances - solid". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
25. On or about March 6, 2009 (approx. 8:30 am), approximately 1 gallon of site cleanup waste was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as "Non-RCRA Hazardous Waste - Solid". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
26. On or about March 6, 2009 (approx. 8:30 am), approximately ½ gallon of solidified fuel oil and debris waste was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report of this incident. The hazardous waste manifest for this released material classified the waste as "Non-RCRA Hazardous Waste – Solid". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
27. On or about March 17, 2009, approximately 2 quarts of lead-containing soil was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as an "Environmentally Hazardous Substances - solid". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
28. On or about May 7, 2009, approximately 1 quart of demolition waste/asbestos was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as "Asbestos". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
29. On or about July 15, 2009, approximately 2 quarts of oily sludge were spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as a "Non-RCRA hazardous waste". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
30. On or about September 9, 2009, approximately 1 quart of sand blast grit with lead was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as a "Non-RCRA hazardous waste". CWM failed to report the discovery of the release of a

hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.

31. On or about September 23, 2009, approximately 5 to 8 gallons of grease/sludge were spilled in the vicinity of the Drum Storage Unit according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as a "Non-RCRA hazardous waste". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
32. On or about November 3, 2009, approximately 2 quarts of oily solids/debris were spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as a "Non-RCRA hazardous waste". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
33. On or about November 10, 2009 (approx. 4:00 pm), approximately 1 pint of lead-containing soil was spilled in the vicinity between the Guard House and Site Maintenance according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as an "Environmentally Hazardous Substances – Solid". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
34. On or about November 10, 2009 (approx. 3:00 pm), approximately 1 quart of lead-containing soil was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as an "Environmentally Hazardous Substance – Solid". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
35. On or about November 10, 2009 (approx. 3:30 pm), approximately 1 quart of lead-containing soil was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as an "Environmentally Hazardous Substance – Solid". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
36. On or about November 10, 2009 (approx. 4:00 pm), approximately 1 quart of lead-containing soil was spilled in the vicinity between the Guard House and Site Maintenance according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as an "Environmentally Hazardous Substance – Solid". CWM failed to report the discovery of the release of a hazardous

waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.

37. On or about November 10, 2009 (approx. 4:00 pm), approximately 1 pint of lead-containing soil was spilled in the vicinity between the Guard House and Site Maintenance according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as an "Environmentally Hazardous Substance – Solid". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
38. On or about November 10, 2009 (approx. 2:00 pm) , approximately 1 quart of lead-containing soil was spilled in the vicinity between the Guard House and Site Maintenance according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as an "Environmentally Hazardous Substance – Solid". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
39. On or about November 19, 2009, approximately 1 quart of oily water/sludge was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as a "Non-RCRA hazardous waste". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
40. On or about January 22, 2010, approximately 2 pounds of sulfur filter cake were spilled in the vicinity of the closed B 15 landfill according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as a "Non-RCRA hazardous waste - Solid". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
41. On or about January 25, 2010, approximately 2 gallons of demolition debris were spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as a "Non-RCRA hazardous waste". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
42. On or about February 2, 2010, approximately 2 gallons of soil were spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as a "Non-RCRA hazardous waste". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.

43. On or about March 1, 2010, approximately 1 gallon of paint, glue was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as a "Non-RCRA hazardous waste". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
44. On or about March 8, 2010, approximately 1 gallon of debris was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as a "hazardous waste". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
45. On or about March 30, 2010, approximately 1 pint of demolition debris was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as a "Non-RCRA hazardous waste". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
46. On or about April 1, 2010, approximately 1 gallon of concrete grindings with lead was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as a "hazardous waste". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
47. On or about April 8, 2010, approximately 2 gallons of debris was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as a "Non-RCRA hazardous waste". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
48. On or about May 6, 2010, approximately ½ gallon of oily solids was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as a "Non-RCRA hazardous waste". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
49. On or about June 9, 2010, approximately 1 pound of catalyst fines was spilled in the vicinity of the closed B 15 landfill according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as a "Non-RCRA hazardous waste". CWM failed to report the discovery of the release

of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.

50. On or about July 7, 2010, approximately ½ gallon of site cleanup waste was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as a “Non-RCRA hazardous waste”. CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
51. On or about September 17, 2010, approximately 5 pounds of soil with paint was spilled in the vicinity of the closed B 15 landfill according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as a “Non-RCRA hazardous waste”. CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
52. On or about November 10, 2010, approximately ½ gallon of wash water with metals was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as a “Non-RCRA hazardous waste”. CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
53. On or about December 29, 2010, approximately 1 pint of water treatment sludge was spilled in the vicinity of the In Bound Scale according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as a “Hazardous Waste”. CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
54. On or about January 21, 2011, approximately ½ gallon of asbestos was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as a “Waste Asbestos”. CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
55. On or about February 1, 2011, approximately ¼ gallon of asbestos was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as a “Waste Asbestos”. CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.

56. On or about February 22, 2011, approximately ¼ gallon of lead-containing soil was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as an "Environmentally Hazardous Substance - Liquid". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
57. On or about March 2, 2011, approximately 1 pint of friable asbestos was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as a "Waste Asbestos". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
58. On or about March 16, 2011, approximately ½ pint of crude oil residue was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The Generator Profile for this released material classified the waste as a "Environmentally Hazardous Substance - Solid". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
59. On or about May 16, 2011, approximately ½ pint of oil field debris was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as a "Non-RCRA hazardous waste". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
60. On or about August 4, 2011, approximately 1 quart of catalyst with copper was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as a "Non-RCRA hazardous waste". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
61. On or about October 10, 2011, approximately ½ pint of geothermal scale was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as an "Environmentally Hazardous Substance - Liquid". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
62. On or about November 23, 2011, approximately ½ pint of NORM scale was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as an "Environmentally Hazardous Substance - Liquid". CWM failed to report the discovery of

the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.

63. On or about November 25, 2011 (approx. 2:00 pm), approximately ½ pint of NORM scale was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as an “Environmentally Hazardous Substance - Solid”. CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
64. On or about November 25, 2011 (approx. 3:00 pm), approximately ½ pint of NORM scale was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as an “Environmentally Hazardous Substance - Solid”. CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
65. On or about November 25, 2011 (approx. 3:30 pm), approximately ½ pint of NORM scale was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as an “Environmentally Hazardous Substance - Solid”. CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
66. On or about November 25, 2011 (approx. 3:30 pm), approximately ½ pint of NORM scale was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as an “Environmentally Hazardous Substance - Solid”. CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
67. On or about November 25, 2011 (approx. 4:00 pm), approximately ½ pint of NORM scale was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as an “Environmentally Hazardous Substance - Solid”. CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
68. (Duplicate) On or about November 28, 2011, approximately ½ pint of NORM scale was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as an “Environmentally Hazardous Substance - Solid”. CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.

69. On or about November 30, 2011, approximately 1 pint of filter cake was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as a "Non-RCRA hazardous waste". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
70. On or about December 29, 2011, approximately ¾ pint of geothermal debris was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as a "Non-RCRA hazardous waste". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
71. On or about February 9, 2012, approximately 1 gallon of wastewater filter cake was spilled in the vicinity of the closed B 15 landfill according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as a "Non-RCRA hazardous waste". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
72. On or about May 24, 2012, approximately 1 pint of wastewater filter cake was spilled at the CWM facility Sample Rack according to a CWM Spill/Release report for this incident. The hazardous waste manifest for this released material classified the waste as a "Non-RCRA hazardous waste". CWM failed to report the discovery of the release of a hazardous waste to DTSC verbally within 24 hours and in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.

CWM does not have a permit or proper authorization from DTSC to dispose of hazardous waste or hazardous constituents to the ground at these locations. CWM did not report the above discovery of releases of hazardous waste to DTSC within the 24-hour time limit for verbal notification or within the 10-day time limit for written notification as required by Part VI (Corrective Action) of the Hazardous Waste Facility Permit.

Schedule for Compliance:

Notify DTSC of all releases of a hazardous waste/hazardous constituent at their facility in accordance with Part VI (Corrective Action) of the hazardous waste facility permit issued to CWM.