

**NOTICE OF EXEMPTION**

**To:** Office of Planning and Research  
State Clearinghouse  
P.O. Box 3044, 1400 Tenth Street, Room 212  
Sacramento, CA 95812-3044

**From:** Department of Toxic Substances Control  
700 Heinz Avenue, Suite 200  
Berkeley, California 94710-2721

**Project Title:** Issuance of a Standardized Permit to Unique Premium Metals Inc.

**Project Location – Specific:** 640 South Hill Street, Suite 743

**Project Location – City:** Los Angeles

**Project Location – County:** Los Angeles

**Description of Project:****Background**

Unique Premium Metals Inc. (UPM) accepts jewelry polishing dust from jewelry manufacturers, processes it, and then assays for precious metal content. The polishing dust is comprised of polishing compound containing fatty acid and wax mixed with metal dust. The dust is regulated as hazardous in California because it is a fine powder containing metals (copper, barium, nickel, zinc, silver) that typically exceed the regulatory levels. The dust waste (California Waste Code 172) also contains silica from the polishing compound.

UPM is located in a suite on the seventh floor of the St. Vincent Center Building at 640 South Hill Street, in downtown Los Angeles Jewelry District. The storage and treatment of jewelry polishing dust is conducted at UPM in a small office suite (41.55' by 19', excluding an area of 9.5' by 14.75' in one corner), accessible to authorized employees only. UPM puts the polishing dust in a furnace to melt off the wax in the polishing compound and to dry the metal dust. Next, the dust is ground and sieved to desired size ("Finished Dust"). Then, UPM assays the gold content of Finished Dust, also a hazardous waste in California. After the assays UPM sends the Finished Dust under manifest to precious metal recycling facilities for reclamation.

**Project Description**

In accordance with California Health and Safety Code (H&SC), sections 25200 and 25201.6, the Department of Toxic Substances Control (DTSC) is proposing to issue a Standardized Hazardous Waste Facility Permit (Permit) to Unique Premium Metals (UPM) authorizing the storage and treatment of jewelry polishing dust, a hazardous waste in California due to metal contents, routinely generated off-site.

The Permit will allow UPM to store 15 30-gallon drums (approximately 1,500 pounds) of incoming dusts and 6 55-gallon drums (approximately 1,500 pounds) of Finished Dust, and allow UPM to use two (2) melting kilns (furnaces), two (2) ball mills, two (2) screen sieves, and one (1) blender.

**Name of Public Agency Approving Project:** California Department of Toxic Substances Control

**Name of Person or Agency Carrying Out Project:** Amber Harmon

**Exempt Status:** *(check one)*

- Ministerial (Sec. 21080(b)(1); 15268);  
 Declared Emergency (Sec. 21080(b)(3); 15269(A));  
 Emergency Project (Sec. 21080(b)(4); 15269(b)(c));  
 Categorical Exemption. State type and section number: \_\_\_\_\_  
 Statutory Exemptions. State code number: \_\_\_\_\_  
 General Rule (Sec. 15061(b)(3))

**Exemption Title:** With Certainty, No Possibility of a Significant Environmental Effect

**Reasons Why Project is Exempt:**

- 1) UPM is an existing facility and has been conducting their business at the project site since 1991. UPM leases an office suite located on the seventh floor of a high-rise building in the downtown Los Angeles jewelry district. It is located in the building called St Vincent Center which is on South Hill Street between West Sixth Street and West Seventh Street. The building is designated as a Commercial Zone (C5), which permits Jewelry Manufacturing. The majority of businesses in the building are jewelry retailers and manufacturers. As UPM's operation is incidental to and arises from permissible jewelry manufacturing and related operations on the property, it is deemed a customarily incidental and therefore permissible use of the property by the City of Los Angeles.
- 2) UPM is located in downtown Los Angeles and is surrounded by a well-developed urban setting, so no agricultural, cultural, or biological resources will be impacted by UPM's operations.
- 3) The Project will not require any new construction, and thus will have no impact on geology and soils, mineral resources, hydrology and water quality, or cultural resources.
- 4) The project will not hire any new employees; therefore there will be no impact to public services, population and housing, or recreation.
- 5) There will be no impact to utilities and service systems. The project is in an existing building and the infrastructure in this developed business district is adequate to support the utility usage of UPM. No additional services will be required to support this ongoing operation.
- 6) The only potential impact to air quality is the operation of the two kilns, which have integral afterburners to reduce/eliminate any potentially harmful emissions. These kilns have been approved and permitted by the South Coast Air Quality Management District, so thus the air quality shall not be negatively affected.
- 7) The jewelry polishing dust is hazardous because it is a fine powder with elevated levels of metal, thus it is an inhalation risk. The only hazards of the process itself would be for the employees, either inhaling the dust or burning themselves with the hot furnace or material. These hazards are mitigated by using protective equipment and work practices.
- 8) The volume of waste that UPM manages is small. Typically, the incoming dust is received in small containers, most of which are generated in the same building as UPM. Due to the small quantities, the generators are able to bring the dust to UPM by hand. On average, four customers come in per day, some of whom will transport the dust in their personal vehicle. UPM sends out a maximum of four shipments per month, using a registered hazardous waste transporter. Therefore there is no impact on traffic and transportation.
- 9) The Los Angeles Fire Department has inspected UPM and found no violations; therefore, the equipment and processes are in compliance with the fire code and do not pose a fire hazard to the building.
- 10) All of the storage and treatment activities at UPM are conducted inside the existing building, out of public view. There are no outdoor lights. Therefore there is no impact to aesthetics.
- 11) An enclosed room was built around the ball mills to reduce noise transmission to the exterior of the facility. Thus there is no impact on noise.

12) The waste received at UPM does not contain liquids, and will not require secondary containment.

<u>Amber Harmon</u>		<u>( 510 ) 540-3779</u>
Lead Agency Contact Person		Phone #
<u>DTSC Branch Chief Signature</u>		<u>Date</u>
<u>Mohinder Sandhu</u>	<u>Supervising Hazardous Substances Engineer II</u>	
DTSC Branch Chief Name	DTSC Branch Chief Title	

**TO BE COMPLETED BY OPR ONLY**

**Date Received For Filing and Posting at OPR:** \_\_\_\_\_