

Lead Clean Up and Residual Substance Removal Final Report

SITE: ARC International, Inc.
LOCATION: Industry, California



Prepared for

Zions First National Bank
Credit Management Department
1 South Main Street, Fifth Floor
Salt Lake City, Utah 84111

California Department of Toxic Substances Control
Chatsworth Regional Office
9211 Oakdale Avenue
Chatsworth, California 91331

Prepared by



EarthTouch, Inc.
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Layton, Utah 84041

**LEAD CLEAN UP AND RESIDUAL SUBSTANCE REMOVAL
OF ARC INTERNATIONAL INC., AN INDUSTRIAL PROPERTY LOCATED
AT 333 TURNBULL CANYON ROAD IN THE CITY OF
INDUSTRY, (LOS ANGELES COUNTY), CALIFORNIA**

SUMMARY

The following is a summary report of the implementation of the Work Plan for Lead Clean Up and Residual Substance Removal approved by the California Department of Toxic Substances Control (DTSC) at the ARC International Inc. (ARC) industrial property located at 333 Turnbull Canyon Road, in the city of Industry, (Los Angeles County), California (*subject property* or *site*). The work plan was approved for the cleanup of lead and lead-contaminated materials identified in the building and equipment inside and outside the building as outlined in a Statement of Violations (SOV); proper disposal of waste oil and waste paint-related materials as outlined in the SOV; implementing the provisions of a closure plan prepared by ARC International (ARC) and submitted to DTSC as outlined in the SOV; and removal and proper disposal of any hazardous and non-hazardous regulated wastes or substances identified in a previously prepared Phase I ESA or observed on the subject property formerly owned and/or occupied by ARC.

A draft work plan was prepared and submitted to the DTSC for review and modification on 18-Sep-2009. In response to recommended modifications a final work plan was prepared and submitted to DTSC on 24-Nov-2009 (Appendix A). The DTSC approved the work plan by letter dated 9-Dec-2009 (Appendix B). Following final negotiations with the approved contractor (JC Environmental Company, Inc. [JCE]) work on the site commenced on 4- Jan-2010.

According to the work plan all personnel working at the site had received initial and refresher training in accordance with all applicable state and federal regulations, and received an initial orientation and instructions regarding the elements and requirements of the approved work plan. Daily Tailgate Safety Meetings were conducted and a Daily Field Activity Log (Appendix C) were kept during the active clean-up phase of the project that ran from 4-Jan-2010 to approximately 3-Feb-2010, with additional work being conducted through 11-Mar-2010. During this time period the debris and containers of identified substances were collected, segregated, characterized and loaded in to appropriate containers for disposal. Non-contaminated items from the offices and warehouse area were also segregated and managed a non-regulated wastes or solid wastes for reuse, recycling or disposal. Prior to the implementation of the work plan, items from the offices were transported by TRV Transport on a Straight Bill of Lading to Cali Resources for re-use/recycling. Additional non-regulated items from the offices and exterior of the building including cardboard, miscellaneous steel, wooden pallets, desks, chairs and plastic items were segregated and transported by Scrap America on a Straight Bill of Lading to their facility for recycling and by Cali Resources to their facility for recycling/reuse. Used tires located in a storage container on the exterior of the building were transported on a Bill of Lading by Art's Tires for recycling. Regulated materials were transported by: Advanced Chemical Transporters (CAD028277036); JCE (CAL000209875); United Pumping Services (CAD072953771); and SLT Express Way, Inc. (ARK00050851) to permitted facilities: Rineco Chemical Industries (1007 Vulcan Road Haskell, Benton, Arkansas (ARD981057870); Filter Recycling Services, Inc. 180 W. Monte Avenue, Rialto, California (CAD98244481); US Ecology Nevada, Inc. P.O. Box 578, Highway 95, 11 miles south of Beatty, Beatty,

Nevada (NVT330010000); and Copper Mountain Landfill, 34583 East County 12th Street, Wellton, Arizona (4133 – Non-RCRA wastes). A summary of the disposal of regulated and non-regulated substances and materials and copies of all manifests, and bills of lading is included in Appendix D

In accordance with the approved work plan, surfaces in the warehouse that had been identified by previous sampling were cleaned using a HEPA vacuum to remove contaminated dusts. Following the vacuuming of surfaces a pressure washer was utilized to clean the ceilings, exposed piping, light fixtures, walls, floors of the interior and exterior areas of the building and grounds, and equipment left inside and on the exterior of the building. The building was divided in to four Areas and the Areas were further divided into 12 Quads at the direction of the DTSC representative for sampling. Following initial cleaning in each of the areas and quads, sampling was conducted to determine the success of the initial cleaning operation. The standard established by DTSC for the lead contaminated areas of the building was 400 $\mu\text{g}/\text{ft}^2$. The first sampling event following cleaning was conducted on 20 Jan-2010 and involved taking 33 samples of walls, ceilings, floors, hoppers, lights, pipes, and miscellaneous pieces of equipment inside the building. At the request of the DTSC, two areas were selected for sampling of mercury and cadmium as well. These sites include a Quad in Area 1 as well as an air vent in one of the offices adjacent to the warehouse. The standards established by DTSC for mercury and cadmium were 157 $\mu\text{g}/\text{m}^3$ and 1,560 $\mu\text{g}/\text{m}^3$ respectively. The initial work plan was amended to include these standards (Appendix A). Results of the initial (and subsequent) lead, mercury, and cadmium testing including maps showing the locations of the sample sites, is included as Appendix E. Sampling events occurred on five dates (20-Jan-2010, 29-Jan-2010, 2-Feb-2010, 11-Feb-2010, and 19-Feb-2010). Following each sampling event, areas that failed to meet the established standards were re-cleaned in accordance with the work plan. Following the cleaning, sampling, and re-cleaning operations of all Areas and Quads, the sampling results confirmed that all areas of the warehouse and equipment identified as contaminated in the work plan had been cleaned to meet or exceed the standards established by DTSC in the work plan. The areas sampled for mercury and cadmium were well below the established standards at initial testing, and required no further action (Appendix F). A table summarizing the final sampling results is presented as follow:

Sample ID	Location	Result 1 ($\mu\text{g}/\text{ft}^2$)	Result 2 ($\mu\text{g}/\text{ft}^2$)	Result 3 ($\mu\text{g}/\text{ft}^2$)	Standard ($\mu\text{g}/\text{ft}^2$)	Final Result ($\mu\text{g}/\text{ft}^2$)
CW-001	Hopper1 Left	1657.7 ⁽¹⁾				⁽¹⁾
CW-002	Hopper 2 right	881.0 ⁽¹⁾				⁽¹⁾
CW-003	Green Platform	129.00 ⁽¹⁾	X	X	400	129.0
CW-004	Rack E Waste Storage Area	274.6 ⁽¹⁾	X	X	400	274.6
CW-005	Quad 1 Floor	104.5	X	X	400	104.5
CW-006	Quad 1 Wall	13.5	X	X	400	13.5
CW-007	Quad 1 ceiling	12.8	X	X	400	12.8
CW-008	Quad 1 Pipe	39.5	X	X	400	39.5
CW-009	Quad 1 Light Fixture	203.4	X	X	400	203.4
CW-010	Quad 2 Floor	30.2	X	X	400	30.2
CW-011	Quad 2 Wall	15.8	X	X	400	15.8
CW-012	Quad 2 Ceiling	11.3	X	X	400	11.3
CW-013	Quad 2 Pipe	104.1	X	X	400	104.1
CW-014	Quad 2 Light Fixture	119.0	X	X	400	119.0
CW0-015	Quad 3 Floor	731.0 ⁽²⁾				⁽²⁾
CW-016	Quad 3 Wall	32.0	X	X	400	32.0
CW-017	Quad 3 Ceiling	13.0	X	X	400	13.0
CW-018	Quad 3 Pipe	321.4	X	X	400	321.4
CW-019	Quad 3 Light Fixture	702.0 ⁽²⁾			400	⁽²⁾

Sample ID	Location	Result 1 ($\mu\text{g}/\text{ft}^2$)	Result 2 ($\mu\text{g}/\text{ft}^2$)	Result 3 ($\mu\text{g}/\text{ft}^2$)	Standard ($\mu\text{g}/\text{ft}^2$)	Final Result ($\mu\text{g}/\text{ft}^2$)
CW-020	Quad 4 Floor	1029.3	CW-149 (1365.8)	CW-154 (148.8)	400	148.8
CW-021	Quad 4 Wall	30.8	X	X	400	30.8
CW-022	Quad 4 Ceiling	78.5	X	X	400	78.5
CW-023	Quad 4 Light Fixture	186.9	X	X	400	186.9
CW-024	Quad 4 Pipe	105.2	X	X	400	105.2
CW-025	Quad 3 CRT Shredder Floor	154.8	X	X	400	154.8
CW-026	Quad 3 CRT Shredder Ceiling	76.8	X	X		76.8
CW-027	Quad 3 Shredder Hopper2	3728.8 ⁽¹⁾				(1)
CW-028	Quad 3 Shredder Hopper2	3466.5 ⁽¹⁾				(1)
CW-029	Quad 3 Shredder Hopper 2	499.3 ⁽¹⁾				(1)
CW-030	Quad 2 Hopper 3	955.7 ⁽¹⁾				(1)
CW-031	Quad 2 Hopper 3	3913.5 ⁽¹⁾				(1)
CW-032	Silo E Waste Storage Area	293.8 ⁽¹⁾	X	X		293.8
CW-033	QC Sample	<10	X	X	400	<10
CW-034	Floor Quad 5	366.3	X	X	400	366.3
CW-035	Wall Quad 5	11.5	X	X	400	11.5
CW-036	Ceiling Quad 5	110.0	X	X	400	110.0
CW-037	Light Quad 5	125.8	X	X	400	125.8
CW-038	Pipe Quad 5	129.3	X	X	400	129.3
CW-039	Floor Quad 5	406.5 ⁽³⁾				(3)
CW-040	Wall Quad 5	<10	X	X	400	<10
CW-041	Ceiling Quad 5	102.5	X	X	400	102.5
CW-042	Light Quad 5	498.0 ⁽²⁾			400	(2)
CW-043	Light Quad 5	2280.0	CW-163 (239.2)	X	400	239.2
CW-044	Floor Quad 6	136.5	X	X	400	136.5
CW-045	Wall Quad 6	<10	X	X	400	<10
CW-046	Ceiling Quad 6	15.8	X	X	400	15.8
CW-047	Light Quad 6	458.3 ⁽²⁾			400	(2)
CW-048	Light Quad 6	142.0	X	X	400	142.0
CW-049	Wall Quad 6	12.8	X	X	400	12.8
CW-050	Floor Quad 6	510.8	CW-156 (70.5)	X	400	70.5
CW-051	Ceiling Quad 6	<10	X	X	400	<10
CW-052	Light Quad 6	98.0	X	X	400	98.0
CW-053	Light Quad 6	342.0	X	X	400	342.0
CW-054	Wall Quad 7	10.3	X	X	400	10.3
CW-055	Floor Quad 7	396.8	X	X	400	396.8
CW-056	Ceiling Quad 7	23.0	X	X	400	23.0
CW-057	Light Quad 7	1067.0	CW-164 (278.0)	X	400	278.0
CW-058	Pipe Quad 7	793.3	CW-165 (92.6)	X	400	92.6
CW-059	Wall Quad 7	20.0	X	X	400	20.0
CW-060	Floor Quad 7	453.3	CW-155 (206.5)	X	400	206.5
CW-061	Ceiling Quad 7	166.8	X	X	400	166.8
CW-062	Light Quad 7	703.8	CW-166 (45.0)		400	45.0
CW-063	Light Quad 7	796.8	CW-167 (459.1)	CW-171 (53.9)	400	53.9
CW-064	Floor Quad 8	130.0	X	X	400	130.0
CW-065	Wall Quad 8	22.3	X	X	400	22.3
CW-066	Ceiling Quad 8	85.3	X	X	400	85.3
CW-067	Light Quad 8	403.0 ⁽²⁾			400	(2)
CW-068	Light Quad 8	59.5	X	X	400	59.5
CW-069	Light Quad 8	<10	X	X	400	<10
CW-070	Floor Quad 8	<10	X	X	400	<10
CW-071	Wall Quad 8	<10	X	X	400	<10
CW-072	Ceiling Quad 8	<10	X	X	400	<10

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CW-073	Light Quad 8	<10	X	X	400	<10
CW-074	Wall Quad 9	<10	X	X	400	<10
CW-075	Floor Quad 9	32.0	X	X	400	32.0
CW-076	Pipe Quad 9	55.8	X	X	400	55.8
CW-077	Ceiling Quad 9	<10	X	X	400	<10
CW-078	Light Quad 9	<10	X	X	400	<10
CW-079	Wall Quad 9	<10	X	X	400	<10
CW-080	Floor Quad 9	140.8	X	X	400	140.8
CW-081	Ceiling Quad 9	<10	X	X	400	<10
CW-082	Light Quad 9	321.3	X	X	400	321.3
CW-083	Light Quad 9	336.5	X	X	400	336.5
CW-084	Floor Quad 10	204.0	X	X	400	204.0
CW-085	Wall Quad 10	<10	X	X	400	<10
CW-086	Light Quad 10	96.5	X	X	400	96.5
CW-087	Ceiling Quad 10	<10	X	X	400	<10
CW-088	Pipe Quad 10	351.0	X	X	400	351.0
CW-089	Fire Ext. Box Quad 10	107.5	X	X	400	107.5
CW-090	Light Quad 10	400.5 ⁽²⁾			400	⁽²⁾
CW-091	Light Quad 10	279.5	X	X	400	279.5
CW-092	Floor Quad 10	474.3	CW-168 (247.5)	X	400	247.5
CW-093	Ceiling Quad 10	<10	X	X	400	<10
CW-094	Wall Quad 11	<10	X	X	400	<10
CW-095	Floor Quad 11	589.8	CW-158 (77.3)	X	400	77.3
CW-096	Light Quad 11	127.5	X	X	400	127.5
CW-097	Ceiling Quad 11	10.8	X	X	400	10.8
CW-098	Light Quad 11	138.0	X	X	400	138.0
CW-099	Wall Quad 11	<10	X	X	400	<10
CW-100	Floor Quad 11	53.3	X	X	400	53.3
CW-101	Ceiling Quad 11	17.8	X	X	400	17.8
CW-102	Light Quad 11	296.8	X	X	400	296.8
CW-103	Light Quad 11	214.5	X	X	400	214.5
CW-104	Wall Quad 12	14.5	X	X	400	14.5
CW-105	Floor Quad 12	540.0	CW-159 (77.3)	X	400	77.3
CW-106	Blank QC	<10	X	X	400	<10
CW-107	Wall Quad 12	<10	X	X	400	<10
CW-108	Floor Quad 12	519.8	CW-160 (135.3)	X	400	135.3
CW-109	Light Quad 12	228.8	X	X	400	228.8
CW-110	Ceiling Quad 12	11.8	X	X	400	11.8
CW-111	Light Quad 12	350.8	X	X	400	350.8
CW-112	Light Quad 12	289.0	X	X	400	359.0
CW-113	Light Quad 12	276.3	X	X	400	276.3
CW-114	Ceiling Quad 12	<10	X	X	400	<10
CW-115	Floor Quad 12	326.3	X	X	400	326.3
CW-116	Floor Quad 11	160.3	X	X	400	160.3
CW-117	Floor Quad 9	569.0	CW-157 (595.8)	CW-170 (62.0)	400	62.0
CW-118	Floor Quad 12A	173.8	X	X	400	173.8
CW-119	Wall Quad 12A	18.8	X	X	400	18.8
CW-120	Pipe Quad 12A	482.3	CW-161 (<10)	X	400	<10
CW-121	Duct Quad 12A	780.5	CW-162 (31.3)	X	400	31.3
CW-122	Ceiling Quad 12A	<10	X	X	400	<10
CW-123	Office Duct 1	164.5	X	X	400	164.5
CW-124	Office Duct 2	20.0	X	X	400	20.0
CW-125	Office Duct 3	181.0	X	X	400	181.0
CW-126	Office Duct 4	14.3	X	X	400	14.3
CW-127	Office Duct 5	51.8	X	X	400	51.8
CW-128	Compactor Door	17.3	X	X	400	17.3
CW-129	Compactor Shears	931.3	⁽¹⁾			⁽¹⁾
CW-130	Compactor Filter	30.8	X	X	400	30.8
CW-131	Container 1 Floor	95.5	X	X	400	95.5
CW-132	Container 1 Ceiling	35.3	X	X	400	35.3
CW-133	Container 2 Floor	137.3	X	X	400	137.3

Sample ID	Location	Result 1 ($\mu\text{g}/\text{ft}^2$)	Result 2 ($\mu\text{g}/\text{ft}^2$)	Result 3 ($\mu\text{g}/\text{ft}^2$)	Standard ($\mu\text{g}/\text{ft}^2$)	Final Result ($\mu\text{g}/\text{ft}^2$)
CW-134	Container2 Ceiling	47.3	X	X	400	47.3
CW-135	Container3 Floor	145.0	X	X	400	145.0
CW-136	Container3 Ceiling	223.3	X	X	400	223.3
CW-137	Container4 Floor	213.5	X	X	400	213.5
CW-138	Container4 Ceiling	45.8	X	X	400	45.8
CW-139	Container5 Floor	37.3	X	X	400	37.3
CW-140	Container 5 Ceiling	13.8	X	X	400	13.8
CW-141	Blank QC	X	X	X	400	X
CW-142	Stairs at Docks	817.0	CW-153 (129.5)	X	400	129.5
CW-143	Parking Lot	191.5	X	X	400	191.5
CW-144	Parking Lot at Docks	664.0	CW-152 (21.5)	X	400	21.5
CW-145	Parking Lot	151.3	X	X	400	151.3
CW-146	Parking Lot	119.8	X	X	400	119.8
CW-147	Parking Lot	139.0	X	X	400	139.0
CW-148	Parking Lot at Street	366.3	X	X	400	366.3
CW-149	(SEE CW-020)	1365.8	CW-157 (595.8)	CW-170 (62.0)	400	62.0
CW-150	Duct (Leased out Office)	229.3	X	X	400	
CW-151	QC Blank	<10			400	
CW-152	(SEE CW-144)	X	X	X	400	21.5
CW-153	(SEE CW-142)	X	X	X	400	129.5
CW-154	(SEE CW-149)	X	X	X	400	148.8
CW-155	(SEE CW-060)	X	X	X	400	206.5
CW-156	(SEE CW-50)	X	X	X	400	70.5
CW-157	(SEE CW-117)	(595.8)	CW-170 (62.0)	X	400	62.0
CW-158	(SEE CW-094)	X	X	X	400	77.3
CW-159	(SEE CW-105)	X	X	X	400	128.5
CW-160	(SEE CW-108)	X	X	X	400	135.3
CW-161	(SEE CW-119)	X	X	X	400	<10
CW-162	(SEE CW-120)	X	X	X	400	31.3
CW-163	(SEE CW-040)	X	X	X	400	239.2
CW-164	(SEE CW-057)	X	X	X	400	278.0
CW-165	(SEE CW-058)	X	X	X	400	92.6
CW-166	(SEE CW-062)	X	X	X	400	45.0
CW-167	(SEE CW-063)	X	X	X	400	459.1
CW-168	(See CW-092)	X	X	X	400	247.5
CW-169	Blank QC	X	X	X	400	<10
170	See CW-157				400	62.0
171	SEE CW-167	X	X	X	400	53.9
172	Blank QC	X	X	X	400	<10
Sample ID	Location	$\mu\text{g}/\text{m}^2$	Result 2 ($\mu\text{g}/\text{m}^2$)	Result 3 ($\mu\text{g}/\text{m}^2$)	Standard ($\mu\text{g}/\text{m}^2$)	Final Result $\mu\text{g}/\text{m}^2$
MC-1	Office Duct 5	3.5 (Hg)			157	3.5 (Hg)
MC-2	Quad 2 Floor	<0.40 (Hg)			157	<0.40 (Hg)
Cad-1	Office Duct 5	110 (Cd)			1,560	110 (Cd)
Cad-2	Quad 2 Floor	6.9 (Cd)			1,560	6.9 (Cd)

- (1) Equipment was determined to have lead based paint and DTSC approved no further cleaning since the equipment was to be used at a similar facility (Call Resources) See Information Appendix G (Lead Paint Inspection Report)
- (2) Light fixtures that were slightly above the 400 $\mu\text{g}/\text{ft}^2$ were approved by DTSC without further testing if they were re-cleaned. All light fixtures were re-cleaned but were not re-tested
- (3) The floors in Quads 3 and 5 were re-cleaned without re-testing per DTSC based on the low level of residual contamination (Quad 3 floor was cleaned three times)

Maps showing sample locations are included in Appendix H. A representative photolog is included in Appendix I. Electronic copies of photographs provided by JCE are included on two enclosed compact discs (CDs).

During the cleaning and sampling an additional groundwater monitoring well associated with a previous Los Angeles Regional Water Quality Control Board case dealing with contribution to an existing groundwater plume (WIP case #102.0055) was identified. The LARWQCB was contacted to see if the two wells that remained on the interior of the building could be closed and removed. Mr. Don Indermill of the LARWQCB, indicated that all of the exterior wells had been removed with approval of the LARWQCB, but that they requested the two remaining interior wells be left in place. He indicated that they did not require any sampling of the wells and did not anticipate future sampling.

A walk through was conducted on 3-Mar-2010 with JC Environmental, DTSC, and EarthTouch. At this time all sample results were available and the results showed that all sample locations inside and outside the building were at or below the $400\mu\text{g}/\text{ft}^2$ standard established by DTSC. At this time the compactor and shear and one conex-type metal container used as a crusher were still in the building. Two roll off containers of regulated waste left by the former building occupant, one roll off container of non-regulated solid waste, and five conex-type containers that were used a crushers were still on the site. All the equipment had been cleaned to the satisfaction of DTSC and had been surveyed with an X-Ray Fluorescence (XRF) instrument and determined to be usable. As stated in the work plan the equipment was to be disposed by Zions Bank in after approval by DTSC. The equipment was sold to Cali-Resources for re-use in the operation. An e-mail from DTSC approved the transportation and re-use by Cali-Resources (Appendix J).

In accordance with the provisions of the work plan, Zions Bank arranged for removal of the remaining recycling equipment from the interior and exterior by Cali-Resources who purchased the equipment from Zions Bank (Appendix K) who also agreed to remove them from the premises. DTSC reviewed the conditions for removal and re-use and approved the action. Cali-Resources completed removal of the equipment on 27-April-2010 effectively completing the implementation of the workplan.

A final walkthrough of the facility was conducted on 6-May-2010 by EarthTouch, Inc., JC Environmental, Inc. and DTSC. At this time DTSC requested a final report and submission of all accompanying information. Between the completion of the lead cleanup and residual substance removal activities in accordance with the work plan and the final site walk-through, a portion of the roof in the warehouse failed due to maintenance issues and weather conditions. The roof collapse did not affect the cleanup operations and is repairs are being handled through the property manager.

As of 6-May-2010, with verbal approval of the DTSC of the implementation of the approved workplan, clean-up and disposal operations were determined to be complete.

APPENDIX A
FINAL WORK PLAN
WITH ADDENDUM 1 AND 2

Work Plan for Lead Clean Up and Residual Substance Removal

SITE: ARC International, Inc.
LOCATION: Industry, California



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RE: Work Plan for the activities necessary to remedy certain identified conditions outlined in a Summary of Violations (SOV) (Appendix A) issued by the Chatsworth Regional Office of the California Department of Toxic Substances Control (DTSC) on 7-Jan-2009; properly identify, remove and dispose of residual substances identified in the SOV as well as those outlined in a Phase I Environmental Site Assessment (ESA) completed for the ARC International property at 333 Turnbull Canyon Road, Industry, California (*subject property or site*) on 19-Feb-2009, as a part of winding up of business operations following foreclosure to provide asset value protection.

At the request of and on behalf of Zions First National Bank, and not individually, EarthTouch, Inc. has prepared this Work Plan for the cleanup of lead and lead-contaminated materials identified in the building and equipment inside and outside the building as outlined in the SOV; properly dispose of waste oil and waste paint-related materials as outlined in the SOV; implement the provisions of a closure plan prepared by ARC International (ARC) and submitted to DTSC as outlined in the SOV; and removal and proper disposal of any hazardous and non-hazardous regulated wastes or substances identified in the Phase I ESA or observed on the subject property at 333 Turnbull Canyon Road, City of Industry, California (*subject property or site*) (Figure 1), formerly owned and/or occupied by ARC.

Environ Con, LLC (Borrower) purchased a 100 percent interest in the real property at 333 Turnbull Canyon Road, City of Industry, California and approached Zions Bank for financing. A down payment was made against the purchase price with the balance to be paid over a specified period outlined in the loan agreement. Since that time Borrower has defaulted on the loan and Zions Bank as mortgagee has foreclosed on the property and holds indicia of ownership by virtue of the foreclosure action.

This Work Plan has been prepared to wind up business operations, remove any residual regulated substances, decontaminate the building and equipment that has been identified to be contaminated with lead as identified in the SOV, and maintain the lender liability protections of Zions Bank as outlined in state and federal regulations.

This Work Plan is in response to requirements outlined in the SOV issued by the California DTSC Chatsworth Regional Office dated 7-Jan-2009, the proposed Work Plan submitted by ARC to the DTSC regarding cleanup and proper disposal of lead-contaminated equipment and surfaces, dispose of residual

waste oil, and waste paint-related materials, 55-gallon drums of hazardous substances, used petroleum products, or unknown substances that were noted on the site during the preparation of the Phase I ESA. All activities outlined in this Work Plan are intended to correct the violations noted in the SOV referenced above, protect the security interest of Zions Bank in the property, and wind up business operations of the Borrower following foreclosure. All work will be done in conformance with applicable regulations and requirements of the state of California. Any site conditions arising from the location of the subject property within the San Gabriel Valley Superfund Area, Puente Unit (Area 4), have been addressed as a separate issue with the Los Angeles Regional Water Quality Control Board.

Site Location and History

The subject property is located at 333 Turnbull Canyon Road, City of Industry, Los Angeles County, California (91745). The Los Angeles County Assessor identifies the subject property by the Assessor Parcel No. (APN): 8208-014-034. The subject property is a rectangular shaped parcel of land encompassing approximately 6.63 acres with roughly 650 feet of frontage along Turnbull Canyon Road and 440 feet of frontage along Proctor Avenue. The size, shape, and dimensions of the subject property are depicted in Figure 2. A summarized legal description of the subject property is given as follows:

- "Parcel 1, in the City of Industry, County of Los Angeles, State of California, as shown on Parcel Map No. 147 filed in Book 120 Pages 64 and 65 of Parcel Maps, in the Office of the County Recorder of Said County."

A review of historical information indicated that the subject property was agricultural land use or undeveloped land from at least 1927 until 1962 when the original portion of the building on the site was developed. Additions to the structure were constructed in 1970, 1976, and 1989. The former owner and operator on the site from the mid-1960s to 2001 was Calmar, Inc., a manufacturer of plastic spray pumps used to dispense, or mist, everything from cleaning products, perfumes, to pharmaceuticals such as nose and throat sprays. The use of the site impacted soil and groundwater with volatile organic compound (VOC) contaminants and resulted in the inclusion of Calmar, Inc. as a Responsible Party (RP) for contamination associated with the San Gabriel Valley Superfund (NPL) Area, Puente Unit (Area 4). Calmar, Inc. ceased business operations at the site in the early 2000s moving to an automated plant near Kansas City, Missouri. ARC, a recycler of various solid and universal wastes, acquired the subject property in late 2007 and subsequently moved operations to another location. However, semi-tractor and rolling stock identified by signage as ARC were noted at a loading dock during the site reconnaissance. At the time of the site inspection, two additional tenants primarily involved in food products and automated teller machine wholesale and distribution were identified as using portions of the site. Issues regarding the former use of the subject property include the storage of eight 55-gallon drums of hazardous substances, used petroleum products, or unknown substances. Additional materials noted on the property included end-of-life or broken consumer electronics, recyclable automotive and aviation equipment, various recyclable machines, and other materials including metals, tires, glasses, and plastics.

The subject property is located within the San Gabriel Valley Superfund Area, Puente Unit (Area 4), which includes shallow groundwater as contaminated by VOCs at concentrations in excess of the MCLs under portions of La Puente, City of Industry, and Walnut. Groundwater contamination was first detected in the San Gabriel Valley in 1979. Following discovery, the State of California analyzed water samples collected from water supply wells throughout the San Gabriel Valley to assess the extent of contamination. By 1984, approximately 59 wells were found to be contaminated with VOCs. In the late 1990s, perchlorate and other newly discovered contaminants were detected in the additional water supply and groundwater monitoring wells. The Puente Unit (Area 4) includes multiple commingled groundwater

contamination plumes which have resulted in an area of contamination over a mile wide and about seven miles long. The depth to the groundwater varies from about 100 to 350 feet with shallow, intermediate, and deep zones and contamination that extends to depths of more than 600 feet bgs. The most prevalent contaminants are trichloroethene (TCE), perchloroethylene (PCE), and dioxane. Sources of groundwater contamination are a result of businesses involved in metal cleaning and coating; chemical, plastics, rubber, aerosols, and electronic component manufacturing; printing, die casting and engineering; and other manufacturing and fabricating activities. The Regional Water Quality Control Board (RWQCB), Los Angeles Region, working under a Cooperative Agreement with the EPA, is identifying sources of contaminants. To date, nearly 400 individual facilities throughout the San Gabriel Valley have been confirmed as having soil contamination and/or contributing to groundwater contamination, including a number of properties within the site vicinity. The location of the subject property within the San Gabriel Valley Superfund Area has been addressed as a separate issue with the Los Angeles Regional Water Quality Control Board.

Site Conditions

The subject property is a generally rectangular-shaped property developed with a single-tenant concrete tilt-up constructed office warehouse building with approximately 126,000 square feet of space and a clear height of roughly 37 feet. The building is constructed on a concrete slab-on-grade foundation that is raised to provide for loading dock access at grade. Construction of the building includes steel-lattice and laminate wood trusses with regularly spaced metal posts and supporting walls that divide the interior warehouse space. The building was constructed in the early 1960s with three subsequent additions and is generally situated toward the southern corner of the site set-back about 50 feet from the southwestern property boundary and 80 feet from the southeastern margin of the site. There are three loading docks along the northeastern elevation and five loading docks along the northwestern elevation. The warehouse is illuminated through a combination of fluorescent lighting and skylights. Offices are generally located within a two-level addition at the northeastern corner of the building with additional office spaces, restrooms, common areas, and entrance lobbies along the southeastern interior portion of the structure. Parking areas for employees and visitors are generally located along the southeastern elevation of the building between the structure and Turnbull Canyon Road and to the northeast of the building. Asphalt tarmac to the southwest and northwest of the building are generally used to support access to loading docks, material storage, and circulation of rolling stock. Vehicular access to the site is via curb cuts along Proctor Avenue and Turnbull Canyon Road. However, access is restricted by gated entrances and guarded gated entrances. The perimeter of the site is surrounded by chain-link and wrought-iron fencing.

There were significant volumes of solid waste that appear to be stored on the site prior to transport to a recycling facility, including metal parts and pieces, cardboard, spent equipment and machines, and other materials. At the time of the initial Phase I ESA, approximately 10 containers were located on the site that had various volumes of materials, presumably for recycling. No bio-hazardous waste was noted. However, some universal wastes were observed within the warehouse and within a metal trailer that include batteries, lamps, computers, electronics, thermostats, and other universal wastes.

Scope of Work

Based upon the findings of the Phase I ESA and a review of administrative files for the subject property at the Chatsworth Office of the DTSC, the following scope of work was developed to address the specific violations noted in the SOV regarding:

- failure to contain all releases of cathode ray tube (CRT) material and residues from CRT materials, failure to ensure that all materials generated as a result of the treatment process were properly classified and managed;
- failure to provide proper closure of the facility pursuant to the ARC International Corporation Electronic Waste Recycling Plant Cleanup Plan (ARC Closure Plan) submitted to the DTSC 16-Dec-2008.

These failures resulted in surface contamination of the process area, and other areas identified by sampling on 15-Jan-2009 by AAA Lead Consultants and Inspections, Inc. and JC Environmental (per the ARC Closure Plan Appendix B). The areas of identified contamination include the warehouse (to include but are not limited to, the office, restrooms, boiler, loading areas and docks, storage areas, a shredder, receiving areas, leased offices, and exterior stairs), the exterior of the building, Crusher 3, and Crusher 4 (Appendix C). Additional areas may have been sampled; however, no report of location or sampling results other than those cited above and included in Appendix C were provided. Since the date of sampling, ARC has ceased operations at the site and as of 20-Jul-2009, all ARC personnel and tenants have vacated the premises. At that time, Zions Bank, through its local real estate company (DAUM Commercial Real Estate Services) secured the site by locking access gates and denying entry to all persons. A law firm retained by Zions First National Bank researched the Uniform Commercial Code (UCC) filings for equipment at the site that was used as security for financing and was subsequently left on the subject property. This equipment has been identified as potentially contaminated with lead. Each of the banks that hold security interest in the potentially contaminated equipment have been notified and apprised of the situation and were given until 10-Aug-2009 to respond or make alternate arrangements for the decontamination and sale of the equipment. As of the date of this Work Plan, no response has been received. Due to the lack of response, the potentially contaminated equipment will be addressed by this Work Plan, decontaminated and sold or disposed at the discretion of Zions Bank. The banks and/or lending institutions notified include:

- City Capital Commercial Corporation
3950 regent Boulevard
Irving, Texas 75063
- Cathay Bank
17432 Colima Road
Rowland Heights, California 91748
- Vincent Huang and Associates, Inc.
17308 Evergreen Place
City of Industry, California 91745

In order to protect the security interest of Zions Bank in the real property and equipment, and at the specific request of and in coordination with the California DTSC, suitable contractors licensed in the state of California and approved by the DTSC will be retained to carry out the decontamination of the interior and exterior of the building and the decontamination of the remaining equipment. In addition to the clean up of the interior and exterior of the building with respect to lead contamination, any residual hazardous or non-hazardous regulated substances remaining on the subject property with the exception of contamination related to the San Gabriel Valley Superfund (NPL) Area, Puente Unit (Area 4) will be undertaken as part of this Work Plan.

This Work Plan is designed to wind up business operations of the Borrower and maintain the lender liability protection for Zions Bank.

Upon completion of the Work Plan activities, EarthTouch, Inc will prepare a report for Zions Bank and the California DTSC summarizing the contractor activities and results of the cleanup performed on the interior and exterior of the building and remaining equipment, as well as the removal and proper disposal of any residual hazardous and non-hazardous regulated substances. This report will include a brief narrative of activities, copies of all verification samples and laboratory results, and copies of manifests of substances disposed.

Work Plan

Prior to carrying out the decontamination of lead-contaminated surfaces and equipment, the contractor and subcontractors shall prepare and submit for review and approval by DTSC and EarthTouch a Site Safety and Health Plan (SSHP) outlining proper training and safety procedures for use of required equipment. The SSHP will further outline any required safety procedures including, but not limited to, personal protective equipment, training, and medical monitoring required under federal and state occupational safety and health regulations.

In accordance with a previous Work Plan prepared and submitted to the DTSC by ARC, contractors under the general oversight of DTSC and EarthTouch propose to carry out the following activities which include those previously outlined generally in Sections II through VI of the ARC Closure Plan (Appendix B) as follows:

1. Review all lead samples previously taken by AAA Lead Consultants and Inspections at the subject property to assure that all areas of contamination have been properly identified, sampled, and will be included in the cleanup operations.
2. Conduct additional lead sampling of areas deemed appropriate by the California DTSC; specifically to include a representative number of heating and air conditioning (HVAC) vents located in the office areas.
3. Conduct preliminary cleanup of the warehouse area by sweeping the floor and containerizing any larger residues. The containers used to temporarily store the sweepings and residue prior to disposal will be appropriately labeled and compatible with requirements of the receiving facility. It is anticipated that the sweepings and residue removal will capture leaded glass, contaminated wood, and miscellaneous debris.
4. Based on the prior wipe testing completed at various locations (Appendix C) and any additional locations determined in tasks 1 and 2 above, decontamination of areas and verification sampling will be undertaken in a fashion to preclude the spread of contamination to areas and equipment not deemed to be contaminated.
5. Vertical and horizontal surfaces to be dry cleaned with a vacuum equipped with a HEPA filter, or equivalent technology, designed for the capture and removal of lead dusts, paint chips and other lead-contaminated materials, followed by wiping with an absorbent sponge or equivalent. These surfaces include, but are not limited to, ceilings, walls, bar joists, I-beams, pipes, and exterior to any duct work, cat walks, conduit, overhead cranes and tracks, and any fixtures that may be

attached to the aforementioned surfaces. As necessary, areas to be cleaned will be accessed by utilizing scissor lifts, boom lifts, and ladders.

6. Following the dry cleaning of surfaces outlined above, all surfaces will be pressure washed to ensure removal of lead contamination. The wash/rinse water generated by this process will be captured and containerized in a suitable, properly labeled container to allow for evaporation. Appropriate pumps will be utilized to transfer the residue (to include but not be limited to water, sludge, and loose absorbent) to properly labeled containers acceptable by the receiving facility for disposal. Absorbent socks, loose absorbent, and plastic draping materials, etc. will be used to shield the working areas and to confine wash/rinse waters from affecting uncontaminated areas.
7. While surfaces are still wet, a heavy duty degreaser may be applied to all surfaces by using handheld spray bottles. The degreaser would then be rinsed off and wiped using lint free cloths. Any regulated waste generated by this process will be placed in properly labeled containers suitable for disposal.
8. All floors may be dry and wet cleaned. Dry cleaning will consist of using a HEPA filter equipped vacuum, or equivalent, designed for the capture and removal of lead dusts, paint chips and other lead-contaminated materials, followed by a wet cleaning of the floor using a lead-specific detergent or equivalent. Following detergent washing, floors will be rinsed with clean water utilizing a three-bucket mop method or equivalent to ensure lead removal. Squeegees can be utilized to remove excess rinse water. All wash and rinse waters will be collected and placed in properly labeled containers suitable for disposal.
9. The two crushers identified by initial testing as contaminated (Crusher 3 and 4) will be dry cleaned utilizing methods similar to those outlined above. Both crusher units will be wet cleaned utilizing methods similar to those outlined above. All wash and rinse waters, absorbents, and shielding materials will be handled as contaminated trash and placed in containers suitable for disposal.
10. All other equipment, containers, and surfaces identified in tasks 1 and 2 above will be similarly cleaned in a sequence that minimizes the cross contamination of previously cleaned equipment or surfaces and precludes the spread of contamination to uncontaminated areas of the plant. (DTSC Note: On 3-Nov-2009, five containers identified as part of the treatment activity to crush CRT glass and Electronic Devices were noted on the site and shall be cleaned, decontaminated, and verification samples shall be conducted).

Verification samples will be taken of all cleaned equipment and surfaces to determine the effectiveness of the decontamination process. All verification samples will be sent to a Department of Health Services (DHS) Environmental Laboratory Accreditation Program (ELAP) certified lab. Samples should be analyzed using EPA Method 6010B for total lead.

11. Any areas where verification sampling indicates residual contamination will be re-cleaned as outlined above and retested until results indicate a successful decontamination per DTSC requirements.
12. All lead-contaminated wastes, including but not limited to sweepings, vacuumed materials, wash and/or rinse water, protective equipment, plastic sheeting, gloves, tape, glass, dust, miscellaneous lead-contaminated debris, contaminated tools, etc. will be placed in approved, properly labeled

containers and transported by a licensed and permitted transportation company to a permitted and approved disposal facility for disposal.

13. Licensed and approved contractors will properly identify, characterize, containerize, label, manifest, transport, and dispose of any residual hazardous or non-hazardous regulated substances other than the lead-contaminated wastes outlined above, and identified in the SOV and Phase I ESA dated 19-Feb-2009 or observed to be located on the subject property at the time of the implementation of this Work Plan.
14. Wipe Sampling for Lead: In accordance with DTSC recommendations the Housing and Urban Development (HUD) standards, extrapolated to produce industrial standards as identified in the table below, and U.S. EPA Health-Based Benchmark cleanup standards will be used as standards for determining acceptable levels of lead clean up

**Table 14.1
Wipe Sampling for Lead**

Area	HUD residential standard ($\mu\text{g}/\text{ft}^2$)	HUD residential standard x10 to produce industrial standard ($\mu\text{g}/\text{ft}^2$)
Floors	40	400
Window sills	250	2,500
Window wells	400	4,000

A schedule for completion of the tasks will be prepared by the contractor in a Site Specific Work Plan that will include an estimated schedule for completion of the Work Plan tasks, including, but not limited to, the following:

- Date of additional sampling of office HVAC vents;
- Date the equipment, containers, and shredders will be decontaminated;
- Date the initial cleaning will be conducted;
- Date the air ducts will be cleaned if necessary;
- Date of wipe sampling and analysis to confirm that decontamination is complete;
- Date that additional cleanup will take place if the wipe samples come back indicating levels above thresholds;
- Date of "second round" wipe sampling and analysis if necessary;
- Date that wastes will be transported offsite; and
- Other important milestone activity relevant to the decontamination and verification operation and waste disposal operation.

This Site Specific Work Plan will be submitted to DTSC prior to the commencement of site activities.

15. Decontaminated equipment, when the decontamination is approved by the DTSC, will be sold and/or disposed at the discretion of Zions Bank to help recoup costs incurred to carry out this Work Plan:

Site Description: See Site Conditions above.

Address: 333 Turnbull Canyon Road
Industry, California 91745

Relationship of work area to: existing buildings, streets, waterways, or other susceptible environmental features or infrastructure: See Site Conditions above and Appendices.

The following contractors are proposed to be utilized in various aspects of the Work Plan:

JC Environmental Company, Inc.

2504 Transportation Avenue
Suite C
National City, California 91950
Contact: Julius Hannegan
619-477-4416
EPA ID #CAL000209875

AAA Lead Consultants and Inspections

1307 West Sixth Street #134
Corona, California 92882
Contact:
1-800-698-4377
EPA Cert #10024 (Lead Inspector Certificate)
EPA Cert #S0167 (Lead Abatement Training for Supervisors and Contractors)

Advanced Chemical Transport, Inc.

1210 Elko Drive
Sunnyvale, California 94089
Contact: Krista Wood
1-760-489-5600
EPA ID# CAR000070540

Filter Recycling Service, Inc.

2230 Riverside Avenue
Rialto, California 92316
Contact:
1-800-698-4377
EPA ID #CAD 982444481

Environ-Chem Laboratories, Inc.

1214 East Lexington Avenue
Pomona, California 91766
Contact:
Phone Number:
CAL -EHS ELAP Certification No. 1555

Veolia Environmental Services, Technical Solutions

107 Motor Avenue
Asuza, California 91702
Contact: Axel Garcia
Mark Olson
1-626-682-5192
1-800-395-6726
EPA ID # CAD000302903

Additional contractors and subcontractors that may be required to perform the outlined tasks will be pre-approved by DTSC and EarthTouch prior to work being performed.

Signatures of the undersigned are indications of approval of the proposed Work Plan only and do not constitute final approval of the work proposed under the Work Plan.

Zions First National Bank

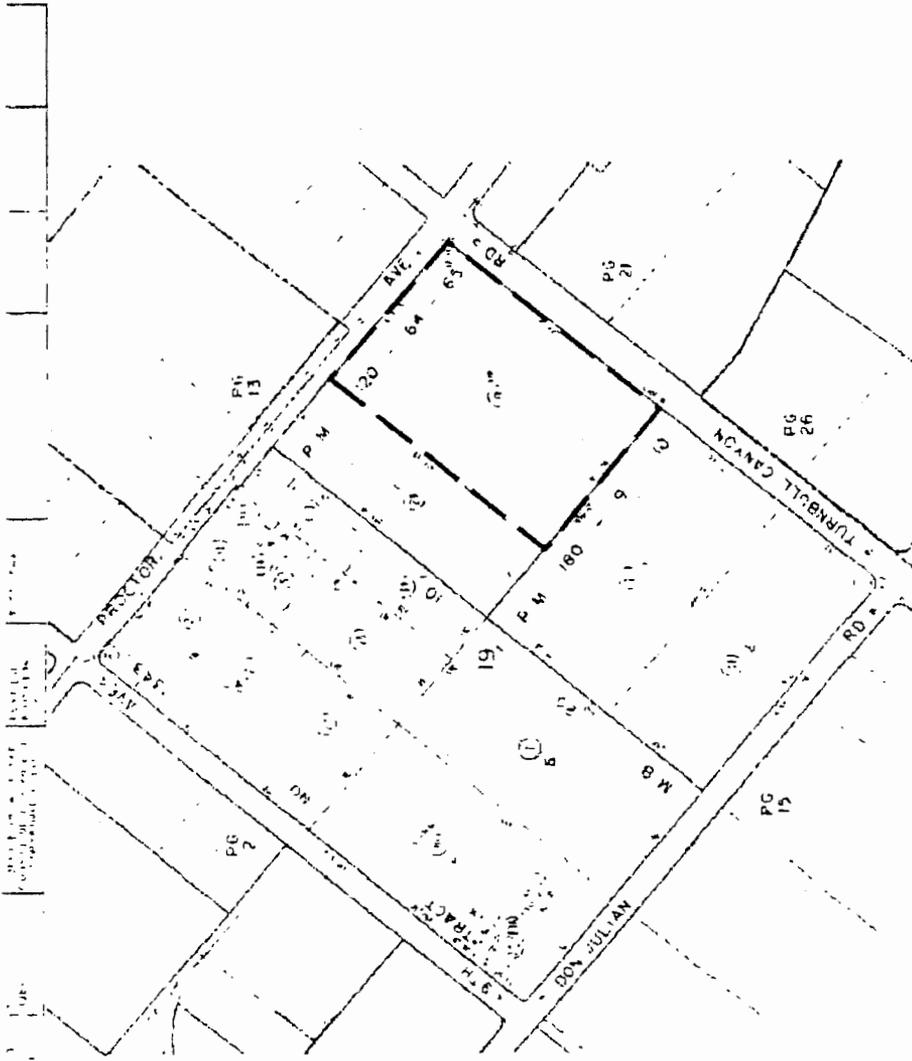


Wesley G. Dewsnap
For Zions Bank

FIGURE 1
LOCATION MAP
(STREET MAP)

FIGURE 2
TAX PLAT MAP

208114
1976



EarthTouch, Inc.
3135 North Fairfield Road
Layton, Utah 84041
Tel: 801.771.2800

FIGURE 3

Plat Map

ARC International, Inc.
333 Turnbull Canyon Road
Industry, California 91745

Figure: 3 Phase I ESA Report
Appendix

Project: ARC International, Inc / ZION-708-CA
Analyst: Brett Cox

Source: Los Angeles County Assessor

APPENDIX B

**ARC INTERNATIONAL CORPORATION
ELECTRONIC WASTE RECYCLING PLANT
CLEANUP PLAN**



Linda S. Adams
Secretary for
Environmental Protection



Department of Toxic Substances Control

Maureen F. Gorse, Director
8211 Oakdale Avenue
Chatsworth, California 91311



Arnold Schwarzenegger
Governor

SUMMARY OF VIOLATIONS

On JANUARY 7, 2009, the Department of Toxic Substances Control (DTSC), California Environmental Protection Agency, conducted an inspection at:

Facility Name: ARC INTERNATIONAL CORPORATION

Facility Address: 333 TURNBULL CANYON ROAD

CITY OF INDUSTRY, CA 91745

EPA ID Number: CAR000180257 County: 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 to you in written correspondence.

DTSC provided you an inspection report at the end of this inspection. Photographs and any other material from the inspection will be forwarded to you within 65 days 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

Name Mike Easterbrook

Signature [Signature]

Title Env. Compliance

Date 01/07/2009

DTSC Representative

Name ELLEN PATES

Signature [Signature]

Title HAZARDOUS SUBSTANCES SCIENTIST

Date JANUARY 7, 2009

Department of Toxic Substances Control

9211 Oakdale Avenue
Chatsworth, California 91311

SUMMARY OF VIOLATIONS

Facility Name: ARC INTERNATIONAL CORPORATION Date: JANUARY 7, 2009

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.

DISPOSAL OF CRT and UNIVERSAL WASTE

- ① ARC International Corporation violated California Code of Regulation, title 22, section 66273.61(a) on or about January 7, 2009, ARC International Corporation disposed of CRT material (broken CRT glass, debris) into a roll-off bin to be sent landfill.

Evidence: Photographs
Complaint submitted by L.A. County Fire
Observations made by inspectors (E. Potos, K. Chen, Davis Childress, Gerard Trippel)
Statement made by Jay Hooper, owner and Mike Easterbrook (part time consultant)
San Hesa

Schedule of Compliance: By January 12, 2009, ARC International shall properly clean and dispose the CRT material to an authorized disposal facility.

NOTE: Filter recycling or (POSSIBLE CONTRACTOR to do the work)
JC Environmental

- ② ARC International Corporation violated CCR, title 22, section 66273.31(a) on or about January 7, 2009, ARC International Corp disposed universal waste lamps and universal waste batteries into a roll-off bin to be sent to landfill.

Evidence: Same as above

Schedule of Compliance: By January 12, 2009, ARC Inter shall shall properly dispose the UW Lamps and UW Batteries to an authorized disposal facility

Department of Toxic Substances Control

9211 Oakdale Avenue
Chatsworth, California 91311

SUMMARY OF VIOLATIONS

Facility Name: ARC INTERNATIONAL CORPORATION Date: 1-7-09

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

3

WASTE MANAGEMENT

ARC International Corp violated CCR, title 22, section 66273.83(a)(1) on or about 1-7-08, failed to contain ^{CRT material} to prevent release and compatible with the contents of the containers.

Evidence: Photographs
Observations by inspectors

Schedule of Compliance: Effective immediately, ARC International shall contain any CRT material in containers to prevent release and compatible w/ the contents of the containers.

4

RESPONSE TO RELEASE

ARC violated CCR, title 22 section 66273.87(a) on or about 1-7-08, ARC failed to immediately contain all release of CRT material and residue from CRT material

Evidence: Photographs
Observation by inspectors

Schedule of Compliance: By Jan 12, 2009, ARC shall immediately contain all release of CRT material and residue from CRT material.

5

BAGHOUSE DUST

ARC violated CCR, title 22, section 66273.83(d)(15) on or about 1-7-09, ARC failed to ensure that all materials generated as a result of the treatment processes are properly classified and managed.

Evidence: photographs
Observations by inspectors

Schedule of Compliance: Within 15 business days, ARC shall ensure all materials generated as a result of the treatment processes are properly classified and managed.

Department of Toxic Substances Control

9211 Oakdale Avenue
Chatsworth, California 91311

SUMMARY OF VIOLATIONS

Facility Name: ARC International Corporation Date: 1/7/09

Continuation Sheet for SECTION II: MINOR VIOLATIONS/ NOTICE TO COMPLY

(6) Labeling/Marking
ARC International Corp violated CCR, title 22, section 66273.84 on or about January 7, 2009, in that ARC failed to properly label or clearly mark each container or pallet in or on which CRTs, CRT devices or CRT glass are contained.

Evidence: Photographs
Observations

Schedule of Compliance: ARC shall label the ¹⁵~~13~~ boxes of CRT glasses and several bag-house dust from the treatment process of CRTs within 10 days of this inspection.

Department of Toxic Substances Control

9211 Oakdale Avenue
Chatsworth, California 91311

SUMMARY OF VIOLATIONS

Facility Name: ARC INTERNATIONAL

Date: 1-7-09

SECTION IV: OTHER ISSUES/CONCERNS

The following issues/concerns were identified during this inspection. Further research may identify additional violations. Any new violations, with the required corrective action and compliance schedule, will be identified to you in written correspondence.

* ARC Closure Plan

- Update information
include outside western end of the building

* Waste Oil and Waste Paint-related

- ensure properly dispose to an authorized facility

* Records

Must provide records for previous shipments
of CRT's, UWED's, ~~##~~ Lead Acid Batteries
UW Lamps and Batteries.

Universal Waste Lamp Handler Inspection Report

Facility Name: ARC International Corporation
 Identification Number: CA 000180257
 Facility Address: 333 Turnbull Canyon Road
City of Industry, CA 91745
 Date Inspected: January 7, 2009
 Inspected By: Ellen Parks and Kam Chen
 Type of Inspection: Limited Re-inspection Complaint
 Consent given by: Jay Hooper - Owner Time: 10:30 AM

DISCLAIMER

This checklist is intended to provide guidance only. This checklist does not replace or supersede relevant statutes and regulations. The information contained in this checklist is based upon the statutes and regulations in effect as of the date the checklist was signed. Interested parties are advised to keep apprised of subsequent changes to relevant statutes and regulations. Note: Refer to Title 22 of the California Code of Regulations for citations that start with the number 6. Refer to the Health and Safety Code for citations that start with the number 2.

REGULATED FACILITIES AND WASTE DEFINITIONS (66273.9)

Universal Waste Handler: a generator of universal waste; or the owner or operator of a facility.
Generator or Producer: any person, by site, whose act or process produces a hazardous waste (or universal waste), or whose act first causes a hazardous waste (or universal waste) to become subject to regulation.
Household: a private residence. Universal waste lamps generated incidental to owning and maintaining a place of residence may be disposed of in a municipal landfill in unlimited quantities through February 8, 2006. After that date, households may not dispose of any lamps in a municipal landfill. [66273.8(a)(1)]
Conditionally Exempt Small Quantity Universal Waste Generator (CESQUWG): a generator of no more than 100 kilograms of RCRA hazardous wastes (includes all universal waste except CRT materials) and no more than 1 kilogram of acutely hazardous waste in any calendar month, a total of five or less CRT devices in a calendar year, and remains in compliance with 40 CFR 261.5. Through February 8, 2006, a CESQUWG may dispose of no more than 30 fluorescent tubes in any calendar month at a municipal landfill. [66273.8(a)(3)(A)(1)] After that date, a CESQUWG must recycle all lamps and they may not dispose of any lamps in a municipal landfill.
Small Quantity Handler of Universal Waste (SQHUW): a handler of universal waste who does not accumulate 5,000 kilograms (~ 25,000 fluorescent tubes) or more total universal waste at any time.
Large Quantity Handler of Universal Waste (LQHUW): a handler that accumulates 5,000 kilograms (~ 25,000 fluorescent tubes) or more of total universal waste at any time. Designation as a LQHUW is retained through the end of the calendar year in which 5,000 kilograms or more total universal waste is accumulated.

Check box if violation: (if checked see attached SOV)

Identification Numbers (LQHUW Only)	
<input type="checkbox"/>	Failed to have an EPA identification number before meeting or exceeding 5,000 kilogram storage limit. [66273.32(a)(1)]
Unauthorized Disposal and Statements	
<input checked="" type="checkbox"/>	The universal waste lamp generator disposed of universal waste lamps at unauthorized point. [66273.11(a)] SQHUW; [66273.31(a)] LQHUW
<input type="checkbox"/>	Made false statement(s) in application, label, manifest, record, report, permit or other document [25185.2(a)]
Labeling of Universal Waste Lamps	
<input type="checkbox"/>	Failed to properly label or mark universal waste lamps or container or package in which lamps are contained with one of the following phrases: "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)." [66273.14(c)] SQHUW; [66273.34(c)] LQHUW

Accumulation Time	
<input type="checkbox"/>	Accumulated universal waste lamps for longer than one year from generation date or longer than one year without proving that such an activity is solely for the purpose of facilitating proper recovery, treatment, or disposal. [66273.15] SQHUW; [66273.35] LQHUW
<input type="checkbox"/>	Failed to demonstrate a date on which the universal waste lamp(s) became a waste. [66273.15(c)] SQHUW; [66273.35(c)] LQHUW
Use and Management of Containers	
<input type="checkbox"/>	Failed to manage universal waste lamps in a way that prevents releases to the environment. [66273.13(c)] SQHUW; [66273.33(c)] LQHUW
<input type="checkbox"/>	Failed to contain universal waste lamps in a closed, structurally sound, compatible container that does not show evidence of leakage or damage. [66273.13(c)(1)] SQHUW; [66273.33(c)(1)] LQHUW

Cathode Ray Tube (CRT) Material Handler (MH) Inspection Report

Facility Name: ARC International Corporation
 Identification Number: CAR 000180257
 Facility Address: 333 Turnbull Canyon Road
City of Industry, CA 91745
 Date Inspected: January 7, 2009
 Inspected By: Ellen Pates and Kam Chen
 Type of Inspection: Annual Re-inspection Complaint
 Consent given by: Ray Hooper - Owner Time: 10:30 AM

DISCLAIMER

This checklist is intended to provide guidance only. This checklist does not replace or supersede relevant statutes and regulations. The information contained in this checklist is based upon the statutes and regulations in effect as of the date the checklist was signed. Interested parties are advised to keep apprised of subsequent changes to relevant statutes and regulations.

Citations that start with the number "06" are to the California Code of Regulations (CCR), title 22, division 4.5. Citations that start with the number "42" are to the Public Resources Code, division 30, part 3, chapter 8.5.

If the CRT Recycler is a permitted Hazardous Waste (HW) Facility, the inspector shall contact DTSC staff responsible for maintaining that facility's permit to determine if additional requirements apply to CRT activities carried out at the facility.

REGULATED WASTES

CRTs (AKA covered electronic devices) are defined as a cathode ray tube, cathode ray tube device, flat panel screen, or any other similar video display device with a screen size that is greater than four inches in size measured diagonally and which the DTSC determines, when discarded or disposed, would be a hazardous waste pursuant to Chapter 6.5 (commencing with Section 25100) of Division 20 of the Health and Safety Code. [42463(f)(1)]

Check box if violation: (if checked see attached SOV)

PROHIBITIONS	
<input checked="" type="checkbox"/>	Disposed of a CRT material. [66273.81(a)]
<input type="checkbox"/>	Diluted or treated a CRT material unless requirements of this section are met. [66273.81(b)]
NOTIFICATION & ANNUAL REPORT	
<input type="checkbox"/>	Failed to notify DTSC at least 30 days prior to accepting any CRT materials from an offsite source. [66273.82(a)]
<input type="checkbox"/>	Failed to submit an annual report to DTSC, if CRT MH accepted >5 CRTs, >5 CRT devices, or >100 kg of CRT glass per calendar year from any offsite source. [66273.82(b)(2)]
<input type="checkbox"/>	Failed to submit annual report to DTSC, if CRT MH generates ≥5,000 kg of CRT material per calendar year. [66273.82(b)(3)]
<input type="checkbox"/>	Failed to submit written annual report to DTSC by February 1 of each calendar year. [66273.82(b)]
<input type="checkbox"/>	Submitted an incomplete notification or annual report. [66273.82(a) & (b)(4)]
<input type="checkbox"/>	A CRT MH who performs data conversions derived from mass data failed to include the conversion factor(s) in the annual report. [66273.82(c)]
<input type="checkbox"/>	Failed to submit a written notification or annual report by certified mail, return receipt. [66273.82(d)]

WASTE MANAGEMENT	
<input checked="" type="checkbox"/>	Failed to contain any CRT materials in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the container. [66273.83(a)(1)]
<input type="checkbox"/>	Failed to immediately clean up and place in a container any CRT material that is broken or shows evidence of breakage, leakage, or damage. [66273.83(a)(2)]
<input type="checkbox"/>	Failed to safely remove CRTs from CRT devices. [66273.83(b)(1)]
<input type="checkbox"/>	Failed to determine whether any of the remaining portions of the CRT device or any other waste generated during the removal process exhibits any characteristic of a HW. [66273.83(b)(2)]
YOKE REMOVAL	
<input type="checkbox"/>	Failed to remove yoke without breaking CRT glass and MH does not meet treatment/recycling standards [66273.83(c)(1)]
<input type="checkbox"/>	Failed to submit complete notification by certified mail regarding yoke removal. [66273.83(c)(2)]
<input type="checkbox"/>	Failed to maintain notification, air permit and other permits (as required), and produce these documents when requested. [66273.83(c)(3)]

<input type="checkbox"/>	Failed to submit the annual report to DTSC by February 1 of each calendar year and by certified mail. [66273.83(c)(4)]
<input type="checkbox"/>	Accepted CRTs or CRT devices that are managed, or are required to be managed as hazardous waste. [66273.83(c)(5)]
<input type="checkbox"/>	Failed to conduct treatment for the purpose of recycling the CRTs or CRT devices. [66273.83(c)(6)]
<input type="checkbox"/>	Failed to ensure all treatment is conducted over or in a containment device sufficient in size and construction to contain any CRT glass that may be released during yoke removal. [66273.83(c)(7)]
<input type="checkbox"/>	Failed to utilize only mechanical methods to remove the yokes. [66273.83(c)(8)]
<input type="checkbox"/>	Used heat, chemicals, or water in yoke removal process. [66273.83(c)(9)]
<input type="checkbox"/>	Failed to ensure that all persons that perform treatment are thoroughly familiar with hazards and have access to proper procedures and protective equipment necessary to safely conduct treatment and to comply with applicable requirements. [66273.83(c)(10)]
<input type="checkbox"/>	Failed to ensure that the facility is operated in compliance with all applicable local and state air pollution control laws and regulations. [66273.83(c)(11)]
<input type="checkbox"/>	Failed to ensure that the facility is operated in compliance with all applicable worker health and safety laws and regulations. [66273.83(c)(12)]
<input type="checkbox"/>	Failed to ensure that all materials generated as a result of the treatment processes are classified and managed properly. [66273.83(c)(13)]
<input type="checkbox"/>	Failed to ensure that the activities conducted at the facility are consistent with local zoning or land use requirements. [66273.83(c)(14)]
<input type="checkbox"/>	Failed to maintain compliance with location, seismic, and precipitation design standards requirements [66273.83(c)(15)]
	CRT TREATMENT OR RECYCLING
<input type="checkbox"/>	Failed to notify DTSC no later than 30 days prior to treating or recycling the CRT material. [66273.83(d)(1)(A)(1)]
<input type="checkbox"/>	Failed to notify DTSC no later than 30 days prior to ceasing treatment or recycling activities [66273.83(d)(1)(A)(3)]
<input type="checkbox"/>	Failed to notify the DTSC no later than 30 days after ceasing treatment or recycling activities [66273.83(d)(1)(A)(3)]
<input type="checkbox"/>	Failed to complete notification and sign, and date notification as specified in title 22 CCR 66270.11. [66273.83(d)(1)(A)(2), 4, 5 and 66273.83(d)(1)(B)]

<input type="checkbox"/>	Failed to submit to DTSC by certified mail a cost estimate for closure no later than 30 days prior to recycling or treating CRT materials. [66273.83(d)(2)]
<input type="checkbox"/>	Failed to submit to DTSC documentation demonstrating financial assurance for closure no later than 30 days prior to recycling or treating. [66273.83(d)(3)]
<input type="checkbox"/>	Failed to submit to DTSC documentation demonstrating financial responsibility for liability no later than 30 days prior to recycling or treating [66273.83(d)(4)]
<input type="checkbox"/>	Failed to maintain on file the most recent notification and air permit (if required) and produce these records when requested. [66273.83(d)(5)]
<input type="checkbox"/>	Failed to prepare and submit an annual report to DTSC by February 1 of each calendar year. [66273.83(d)(6)]
<input type="checkbox"/>	Submitted an incomplete annual report. [66273.83(d)(6)]
<input type="checkbox"/>	Accepted any CRT material that is managed, or is required to be managed, as HW. [66273.83(d)(7)]
<input type="checkbox"/>	Conducted the treatment for the purpose of recycling one or more types of CRT glass and failed to reclaim the CRT glass at a CRT glass manufacturer or at a primary or secondary lead smelter. [66273.83(d)(8)]
<input type="checkbox"/>	Failed to ensure all treatment is conducted over or in a containment device sufficient in size and construction to contain any CRT glass that may be released. [66273.83(d)(9)]
<input type="checkbox"/>	Failed to utilize specified treatment methods [66273.83(d)(10)]
<input type="checkbox"/>	Conducted treatment using chemicals or external heat other than specified in regulation. [66273.83(d)(11)]
<input type="checkbox"/>	Failed to ensure that the facility is operated in compliance with all applicable local and state air pollution control laws and regulations [66273.83(d)(13)]
<input type="checkbox"/>	Failed to ensure that the facility is operated in compliance with all applicable worker health and safety laws and regulations. [66273.83(d)(14)]
<input checked="" type="checkbox"/>	Failed to ensure that all materials generated as a result of the treatment processes are properly classified and managed [66273.83(d)(15)]
<input type="checkbox"/>	Failed to ensure that the activities conducted at the facility are consistent with local zoning or land use requirements. [66273.83(d)(16)]
<input type="checkbox"/>	Failed to maintain compliance with location standards and seismic and precipitation design standards requirements. [66273.83(d)(17)]

LABELING/MARKING	
<input checked="" type="checkbox"/>	Failed to properly label or clearly mark each container or pallet in or on which CRTs, CRT devices or CRT glass are contained. [66273.84]
<input type="checkbox"/>	Failed to properly label a designated area where CRTs and CRT devices are accumulated within demarcated boundaries. [66273.84)(d)]
<input type="checkbox"/>	Stored CRTs and CRT devices along with other materials in designated CRT accumulation areas. [66273.84)(d)]
ACCUMULATION TIME LIMITS	
<input type="checkbox"/>	Accumulated CRT material for more than one year from the date the universal waste (UW) is generated, or received from another handler. [66273.85(a)]
<input type="checkbox"/>	Failed to demonstrate the length of time that the UW has been accumulated from the date it became a waste or was received. [66273.85(b)]
EMPLOYEE TRAINING	
<input type="checkbox"/>	Failed to ensure that persons removing CRTs are thoroughly familiar with the techniques and safety precautions required to safely remove CRTs. [66273.83(b)(1)(C)]
<input type="checkbox"/>	Failed to ensure that all persons that perform treatment or recycling are thoroughly familiar with the associated hazards and have access to the proper procedures and protective equipment necessary to safely conduct the treatment. [66273.83(d)(12)]
<input type="checkbox"/>	Failed to inform all employees who handle or have responsibility for managing CRT material of the proper handling and emergency procedures. [66273.86(a)]
<input type="checkbox"/>	Employees who manage or handle waste CRT materials failed to receive specified initial training. [66273.86(b)]
<input type="checkbox"/>	Employees failed to take part in annual review of the initial training. [66273.86(c)]
RESPONSE TO RELEASES	
<input checked="" type="checkbox"/>	Failed to immediately contain all releases of CRT material and residues from CRT material. [66273.87(a)]
<input type="checkbox"/>	Failed to determine whether any material resulting from a release is a HW. [66273.87(b)]
<input type="checkbox"/>	Failed to manage any material determined to be HW as HW. [66273.87(b)]
<input type="checkbox"/>	Managed residues of leaking, broken, or damaged CRT material as UW without repackaging according to applicable standards. [66273.87(c)]

OFF-SITE SHIPMENTS	
<input type="checkbox"/>	Sent or took CRT material to a place other than another CRT MH, a destination facility, or a foreign destination. [66273.88(a)]
<input type="checkbox"/>	A CRT MH that transports CRT material off-site failed to comply with the UW transporter requirements. [66273.88(b)]
<input type="checkbox"/>	A CRT MH that offers CRT material that meets the definition of a hazardous material for off-site transportation failed to package, label, mark and placard the shipment according to applicable United States Department of Transportation (U.S DOT) regulations. [66273.88(c)]
<input type="checkbox"/>	The originating CRT MH failed to obtain an agreement from the receiving CRT MH prior to sending a shipment of CRT material. [66273.88(d)]
<input type="checkbox"/>	The originating CRT MH failed to follow rejected load procedures. [66273.88(e)]
<input type="checkbox"/>	The receiving CRT MH that rejects a shipment of CRT material failed to follow rejected load procedures. [66273.88(f)]
<input type="checkbox"/>	A CRT MH that receives a shipment of CRT material containing HW failed to notify DTSC of the shipment. [66273.88(g)]
<input type="checkbox"/>	A CRT MH that receives a shipment of non-hazardous, non-UW, failed to manage the waste in compliance with applicable federal, state, and local solid waste regulations. [66273.88(h)]
EXPORT	
<input type="checkbox"/>	Failed to notify DTSC four weeks before the intended initial shipment of CRT material to any foreign destination. [66273.90(a)]
<input type="checkbox"/>	Failed to notify CUPA of the intended export. [66273.90(a)]
<input type="checkbox"/>	Submitted an incomplete notification. [66273.90(b)]
<input type="checkbox"/>	Failed to notify the DTSC at least 60 days prior to export, the destination, contents, and volume of covered electronic waste (e-waste) to be exported to any foreign destination. [42476.5(a)]
<input type="checkbox"/>	Failed to demonstrate that the importation of covered e-waste is not prohibited by any applicable law or regulation of the country of destination and that any import is conducted in accordance with all applicable laws. [42476.5(b)]
<input type="checkbox"/>	Failed to forward required import and operating licenses to the DTSC. [42476.5(b)]

<input type="checkbox"/>	Failed to demonstrate that the exportation of covered e-waste is conducted only in accordance with applicable international law [42476.5(c)]
<input type="checkbox"/>	Failed to demonstrate that the management of the exported covered e-waste will be handled within the country of destination in accordance with applicable rules, standards, and requirements adopted by the Organization for Economic Cooperation and Development (OECD) for the environmentally sound management of e-waste. [42476.5(d)]
<input type="checkbox"/>	Failed to demonstrate that the covered e-waste is being exported for the purpose of reuse or recycling. [42476.5(e)]
RECORDKEEPING	
<input type="checkbox"/>	Failed to maintain a copy of any local air district permits and other permits required for the facility no later than 30 days prior to recycling or treating any CRT material. [66273.83(d)(5)(B)]
<input type="checkbox"/>	Failed to maintain records of employee training received for at least three years from the date the employee last worked at the facility. [66273.86(d)]
<input type="checkbox"/>	Incomplete shipment record of CRT material received [66273.89(a)]
<input type="checkbox"/>	Incomplete shipment record of CRT material sent. [66273.89(b)]

COMMENTS:

NOTE: The inspector shall also note in this section a description of all violations that were observed and corrected during the inspection

The complaint inspection submitted by
L.A. County Fire verified +



ARC International Corporation
Electronic Waste Recycling Plant Cleanup Plan

Plant Location: 333 Turnbull Canyon Road, City of Industry, CA, 91745

Submitted: Tuesday, December 16, 2008

Table of Content

- I. Recycling Plant Overview
- II. Initial Cleaning Process
- III. Background/Preliminary Testing
- IV. Official Cleaning Process
- V. Clearance Testing
- VI. Lead Waste Treatment
- VII. Vendors list

I. Recycling Plant Overview

ARC Turnbull recycling plant has been a primary electronic waste treatment facility in southern California since January 2007. The warehouse is approximately 130,000 Sq feet, which 80% of the total area has been used for E-waste recycling and 20% was used for non-E-Waste recycling activities (logistics Service).

E-waste recycling area is located in the southwest corner of the plant. It includes the loading docks, receiving area, dismantling area, e-waste crusher, and storage area. Under the current condition, those are the primary areas where detailed cleaning process will be taken place. The logistics area will be tested and when appropriate cleaned.

II. Initial Cleaning Process

ARC will conduct a preliminary cleanup by sweeping the floor and any larger residues that are not needed. The lead contaminated residuals will be sent to **Filter Recycling Service, INC.**, for proper disposal. The materials include leaded glass, contaminated wood, gloves, paper, etc.

The purpose of pre-cleaning process is to reduce the noticeable amount of dust on the ground in order to minimize any cross contamination on the equipment, receive an accurate background test result and facilitate the official cleanup process.

III. Background/ Preliminary Testing

The proposed wipe tests will be done by JC Environmental and AAA Lead. All monitoring samples taken will be based on Title 17, California Code of Regulations, Division 1, Chapter 8 Accreditation, Certification and Work Practices in Lead-Related Construction (effective March 30, 1998).

The testing result will determine the presence of lead level that may have accumulated from the recycling activities of crushing lead glass at ARC Turnbull recycling plant. The most common materials generally defined as lead dust are lead based compounds resulting from crushing of lead glass CRTs. Accordingly, the wipe samples should be analyzed for the presence of lead materials.

ARC has hired **AAA LEAD Consultants and Inspections, Inc. and JC Environmental**, to test the lead contamination level. This third party testing would be the determination for the type of cleaning necessary. Below are the proposed background testing procedures:

1) Visual assessment to determine locations and surfaces to be sampled

- ✓ Wipe test sites are chosen in the immediate areas where the waste recycling operation was carried out in the past.
- ✓ Test sites on accessible horizontal surfaces in these areas are taken at intervals of at least fifteen to twenty feet apart, in an approximate square matrix fashion (similar to a cross word puzzle matrix), to cover an area encompassing the immediate waste recycle work area. AAA Lead will supply a map/grid of where testing will be done.
- ✓ A total of about 15 to 20 wipe are initially planned at the E-waste recycle work areas to determine if a series of contamination problems exist at these sites.
- ✓ Wipe samples are taken on a much larger square matrix through out the logistics and office area to identify possible distribution of waste related contamination through those areas.
- ✓ Representative wipe test are taken in any suspect enclosed area.

2) Background wipe sampling interior and exterior

- ✓ Packaged, clean wipe swatches moistened with isopropyl alcohol solution (Clean Tex CT801 Wipe Pad or the equivalent) are used to remove extraneous surface deposits from representative facility and equipment surfaces.
- ✓ Use latex type of gloves to handle the wipe swatch
- ✓ Wipe test locations are chosen on surfaces showing no signs of recent clean-up in order to accurately determine normal background contamination levels.
- ✓ Wipe a surface area of minimum approximately 100 square cm. Create a grid on the facility map to record the testing site.
- ✓ Refold the wipe swatch to present a clean wipe swatch surface for each repeated wipe pass on the selected test site.
- ✓ Replace each wipe swatch in a numbered container. Record wipe test area, location, date and sample number after each wipe test.
- ✓ Submit a reference unused "blank" sample with each series of wipe tests.
- ✓ Horizontal wipe test surfaces are preferred to serve as "worst case" examples for accumulated nuisance dust deposits.
- ✓ All monitoring samples taken will be based on Title 17, California Code of Regulations, Division 1, Chapter 8 Accreditation, Certification and Work Practices in Lead-Related Construction (effective March 30, 1998).

3) Background wipes sampling interior and exterior as per DHS standards.

4) Complete Reports including all test results at completion of project

- ✓ The wipe test results are compared against acceptable reference levels for "hazardous materials" that are in place at Integrated Waste Management Board and/or mandated by the State of California.

- 5) Certified clean up will be documented by AAA Lead when wipe samples show the ARC Turnbull location is clean.
- 6) Data interpretation will be done by AAA Lead and a report will be provided to DTSC.
- 7) Documentation will be done by AAA Lead and will be provided to DTSC.

IV. Lead Remediation Cleaning Process

ARC will perform the cleaning of the facility, as well as the machinery and electrical equipment.

1) Facility Cleaning Methods

✓ Dry Cleaning Method:

Vertical and horizontal surfaces to be cleaned will be HEPA vacuumed, followed by wiping with an absorbent sponge. Surfaces include the ceilings, walls, bar joists, I-beams, pipes, and exterior to any duct work, cat walks, stairways, conduit, overhead cranes and tracks, and any fixtures that may be attached to any mentioned surfaces.

When required, areas will be accessed by utilizing scissor lifts, boom lifts, and ladders.

✓ Wet Cleaning Method:

Dry cleaning procedures mentioned above may be performed first. Then, all the surfaces will be pressure washed to ensure a higher level of lead removal to become clean. The hazardous water will be deposit into a sealed poly tank for temporary storage, and when possible be allowed to sit to allow for evaporation. Bilge pumps, Sump pumps, or wet vacuum will be used to transfer the water; blue absorbent socks and Visqueen drape barriers will be used to shield the working area and restrain hazardous water within certain parameter.

While the surfaces are still moist, a heavy-duty degreaser may be applied to all surfaces by using hand held spray bottles. The degreaser would then be rinsed off and wiped using lint free terry cloth towels. The hazardous waster will be properly stored in the poly tank and cloth towels will be stored in Gaylord box with covers for temporary storage.

Finally, all floors may be dry and wet cleaned. Dry cleaning will consist of a HEPA vacuum to suck in and seal the hazardous dust. Followed by automatic sweeper brushing the floor with the lead-specific detergent, all floors then will be rinsed with clean waster and mopped. For mopping, a three bucket method may be used. Squeegees may be used to collect the water in one area. At the end, fan or blowers are used to dry out the floors.

2) Machinery and Electrical Equipment Cleaning Method

- ✓ There are four units to be cleaned. Two are located inside the building, and two outside.
- ✓ The crusher is a shipping container that has been modified with the additions of a grinder and various holes (approximately 7, varies depending on unit).
- ✓ Crusher Unit will be tested on four outside walls for lead levels using a swipe test (Please see Section III for testing detail). Samples would be sent to **Enviro-Chem Laboratories, Inc.** or equivalent services. The samples will be taken from the center of each wall, with the unit having four walls. The actual locations may be modified by AAA Lead during testing since they have not seen the unit before testing. If any location is modified, the new location will be documented and DTSC will be notified.
- ✓ Pictures will be taken before the cleaning process.
- ✓ Dry cleaning method is applied by using Hepa Vacuum to suck in and seal the hazardous dust.
- ✓ Aqueous based detergents, solvent based and water displacement alcohols are applied to crusher by spraying.
- ✓ Crusher Unit outside will be wiped down to insure the crusher is cleaned.
- ✓ Wipes would be put into a Gaylord Box, sealed, and sent to Filter Recycling Service INC., or equivalent service.
- ✓ Crusher Unit will be cleaned one more time with water.
- ✓ Fan and blower are used to dry the machine.
- ✓ Once unit has been cleaned, samples will be taken at approximately where the initial samples are taken before cleaning.
- ✓ Sample will be sent to Enviro-Chem Laboratories, Inc or equivalent again for clearance test. Test report will be used to determine further action.
- ✓ Re-clean if needed and re-test till acceptable results achieved.
- ✓ The other 3 units would then be cleaned after success with the first unit.

3) Equipment List

Item	Estimated Quantity
Scissor Lift	4
Fork Lift	4
Safety Harness	20
Hot Water Pressure Washer	4
Bilge Pumps	4

Drape Barrier	10
Hoses	5
Blue Absorbent Socks	6
Floor Scrubber/ Sweeper	1
Ledicolv Lead-Specific Detergent (55 Gallon)	5
Hepa Vacuums	4
Water Tank (630 Gallon)	1
Gaylord Box	50
Shrink-wrap Rolls	4
Fan/Blower	4
Mops	15
Squeegee	3

V. Clearance Testing

Prior to the cleanup, background sample will be taken and used as determination for cleaning procedure and initial data. After cleaning, clearance samples are taken at sites where initial sample was so that ARC is able to conclude cleaning process was successful and Turnbull facility has reached the acceptable lead level. If the certain clearance test failed, ARC will re-clean and retest until the acceptable standard achieved.

VI. Lead Waste Treatment

Lead residuals generated during the cleaning process including: lead water, lead cleaning wrap, lead shrank-wrap, lead container, lead glove, etc will be stored in Gaylord boxes and sent to **Filter Recycling Service, INC.**, for proper disposal.

VII. Vendor List

1. **Filter Recycling Service Inc.**, 2230 Riverside Avenue, Rialto, CA 92316, 1-800-698-4377, www.filterrecycling.com, EPA ID: CAD982444481

2. **AAA Lead Consultants and Inspections**, 1307 West Sixth Street #134, Corona, CA, 92882, 951- 582-9071, <http://www.aaalead.net>, EPA Certificate #I0024 Lead Inspector Training, EPA Certificate #S0167 Lead Abatement Training for Supervisors and Contractors

3. **Enviro-Chem, Laboratories, Inc**, 1214 East Lexington Avenue, Pomona, CA 91766 <http://www.enviro-chemlab.com/>, CAL-DHS ELAP Certification No. 1555

4. **JC Environmental Company, Inc.**, 2504 Transportation Ave., Suite C, National City, CA 91950. (619) 477-4416.

APPENDIX C

**AAA LEAD LEAD CONSULTANTS AND INSPECTIONS
WIPE SAMPLING LOCATIONS AND
ANALYTICAL RESULTS**

Dust/Wipe Sample Log

Micron Labs
 El Monte, California



Company AALEAD

No. of Samples <u>19</u>	For Lab Use Only
Client Project No. <u>ARC</u>	Micron Job No. <u>10609004</u>
Client Project Ref. <u>Warehouse</u>	
Turnaround Time <input checked="" type="checkbox"/> Normal <input type="checkbox"/> Next Day <input type="checkbox"/> Rush	

Sample Data Log

	Date Collected	Client Sample ID	Sample Location	Side	Dimensions
1	1/15/09	BW-001	Office Entry	A'L	12'x12"
2		BW-002	Restroom	B'L	12'x12"
3		BW-003	Useable Refurbish	A'C	12'x12"
4		BW-004	Women's RR	C'R	12'x12"
5		BW-005	Leased Office	C'R	12'x12"
6		BW-006	Leased Out	D'L	12'x12"
7		BW-007	Boiler	D'C	12'x12"
8		BW-008	Men's Restroom	D'C	12'x12"
9		BW-009	Outgoing Bales	C'C	12'x12"
10		BW-010	Disassembly Area	C'R	12'x12"
11		BW-011	CPU / Misc Assemblin	C'L	12'x12"
12		BW-012	CRT Storage	C'L	12'x12"
13		BW-013	Wire Stripper	A'R	12'x12"
14		BW-014	Shred / Grinder for HARM	C'L	12'x12"
15		BW-015	CRT Shoulder	A'C	12'x12"
16		BW-016	Loading Area	C'R	12'x12"
17		BW-017	Receiving Area	D'R	12'x12"
18		BW-018	Exterior Stairs	C'L	12'x12"
19		BW-019	Loading Dock	D'R	12'x12"
20					

Relinquished by <u>[Signature]</u>	Date <u>1-15-09</u> Time <u>12:46</u>
Received by <u>[Signature]</u>	Date <u>1-15-09</u> Time <u>12:47 pm</u>

Dust/Wipe Sample Log

Micron Labs
El Monte, California



Company DAAPLEAD

No. of Samples 8

For Lab Use Only

Client Project No. ARC

Micron Job No.

Client Project Ref. Exterior Parking Lot

10609005

Turnaround Time Normal Next Day Rush

Sample Data Log

	Date Collected	Client Sample ID	Sample Location	Side	Dimensions
1	1/15/09	BW-020	Exterior Next to building	C'X	12x12"
2	}	BW-021	Exterior Next to building	C'R	12x12"
3		BW-022	Exterior Next to building	C'R	12x12"
4		BW-023	Exterior 33' out from building	C'R	12x12"
5		BW-024	Exterior 33' out from building	C'R	12x12"
6		BW-025	Exterior 33' out from building	C'C	12x12"
7		BW-026	CRUSHER 4	D'C	12x12"
8		BW-027	CRUSHER 3	B'C	12x12"
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					

Relinquished by [Signature]

Date 1-15-09 Time

Received by [Signature]

Date 1-15-09 Time 12:30 pm

Sample ID	Sample Description	Area Sampled(ft ²)	Vol. (ml)	Dil Factor	Conc. mg/L	Results µg/ft ²
CW-001	Dust Wipes	1.00	25	1	1.68	42.0
CW-002	Dust Wipes	1.00	25	1	9.27	231.8
CW-003	Dust Wipes	1.00	25	1	13.01	325.3
CW-004	Dust Wipes	1.00	25	1	81.20	1530.0
CW-005	Dust Wipes	1.00	25	1	4.75	118.8
CW-006	Dust Wipes	1.00	25	1	11.45	286.3
CW-007	Dust Wipes	1.00	25	1	18.88	416.5
CW-008	Dust Wipes	1.00	25	1	44.24	1106.0
CW-009	Dust Wipes	1.00	25	1	12.11	302.8
CW-010	Dust Wipes	1.00	25	1	31.41	785.3
CW-011	Dust Wipes	1.00	25	1	64.18	1354.0
CW-012	Dust Wipes	1.00	25	1	69.84	1746.0
CW-013	Dust Wipes	1.00	25	1	30.48	762.0
CW-014	Dust Wipes	1.00	25	1	66.17	1654.3
CW-015	Dust Wipes	1.00	25	1	22.25	556.3
CW-016	Dust Wipes	1.00	25	1	64.39	1609.8
CW-017	Dust Wipes	1.00	25	1	24.90	622.5
CW-018	Dust Wipes	1.00	25	1	48.01	1200.3
CW-019	Dust Wipes	1.00	25	1	46.46	1161.5

µg/ft² = micrograms per square foot
MDL for Micron Labs = 4.177 µg/wipe


Analyst Signature

Addendum 1

Work Plan for Lead Clean Up and Residual Substance
Removal

Additional Lead Sampling Locations and Results Conducted Prior
to the Development of the Work Plan

SITE: ARC International, Inc.
LOCATION: Industry, California

Dust/Wipe Sample Log

Micron Labs
 El Monte, California



Company AAA LEAD

No. of Samples <u>19</u>	For Lab Use Only
Client Project No. <u>ARC</u>	Micron Job No. <u>10609004</u>
Client Project Ref. <u>Warehouse</u>	
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3		BW-003	Useable Refurbish	A'C	12"x12"
4		BW-004	Women's RR	C'R	12"x12"
5		BW-005	Leased Office	C'C	12"x12"
6		BW-006	Leased Out	C'H	12"x12"
7		BW-007	Boiler	D'C	12"x12"
8		BW-008	Men's Restroom	D'C	12"x12"
9		BW-009	Outgoing Belts	C'C	12"x12"
10		BW-010	Disassembly Area	C'R	12"x12"
11		BW-011	CPU / Misc Assembling	C'L	12"x12"
12		BW-012	CRT Storage	C'L	12"x12"
13		BW-013	Wire Stripper	A'R	12"x12"
14		BW-014	Shred / Grinders for HAZOP	C'L	12"x12"
15		BW-015	CRT Shoulder	A'C	12"x12"
16		BW-016	Loading Area	C'R	12"x12"
17		BW-017	Receiving Area	D'R	12"x12"
18		BW-018	Exterior Stairs	C'L	12"x12"
19		BW-019	Loading Dock	D'R	12"x12"
20					

Relinquished by <u>[Signature]</u>	Date <u>1-15-09</u> Time <u>12:46</u>
Received by <u>[Signature]</u>	Date <u>1-15-09</u> Time <u>12:47 pm</u>



Micron Environmental Labs

3587 Lexington Av.
El Monte, CA 91731

Analytical Method: EPA SW846-3050-7420
AIHA (ELPAT) ID No.: 103012
CA ELAP Certificate NO. 2297

Date: 1/20/09
Micron Reference No. 10809005

Lead (Pb) in wipes Summary Results

Project: ARC/ Exterior Parking Lot

Analyst: Daniel Gamez

Company: AAA Lead Consultants and Inspections, Inc.
Address: 1307 W. Sixth St. Ste. 104
City, State, Zip: Corona, CA 92882

Date Collected: 1/15/09
Date Received: 1/15/09
Date Analyzed: 1/20/09
No. of samples: 8

Sample ID	Sample Description	Area Sampled(ft2)	Vol. (ml)	Dil. Factor	Conc. mg/L	Results µg/ft2
BW-028	Dust Wipes	1.00	25	1	10.68	267.0
BW-021	Dust Wipes	1.00	25	1	12.65	321.3
BW-022	Dust Wipes	1.00	25	1	17.83	445.8
BW-023	Dust Wipes	1.00	25	1	16.49	412.3
BW-024	Dust Wipes	1.00	25	1	32.85	821.3
BW-025	Dust Wipes	1.00	25	1	13.95	348.8
BW-026	Dust Wipes	1.00	25	1	24.87	616.8
BW-027	Dust Wipes	1.00	25	1	77.14	1928.5

µg/ft² = micrograms per square foot
MDL for Micron Labs = 4.177 µg/wipe

Daniel Gamez
Analyst Signature

Dust/Wipe Sample Log

Micron Labs
El Monte, California



Company AAA Lead Consultants (Inspections Inc.)

No. of Samples 20 For Lab Use Only

Client Project No. ABC 333 S Teabull Cyn Road Micron Job No.

Client Project Ref. Offices & Exterior

Turnaround Time Normal Next Day Rush

Sample Data Log

	Date Collected	Client Sample ID	Sample Location	Side	Dimensions
1	1/30/09	BW-028	Entry to Warehouse	C'C'	12'x12"
2	1/30/09	BW-029	Office at Warehouse Entry	C'R'	12'x12"
3	1/30/09	BW-030	Office 1	C'C'	12'x12"
4	1/30/09	BW-031	Office 1	A'L	12'x12"
5	1/30/09	BW-032	Leased Out 1 at Door	B'R'	12'x12"
6	1/30/09	BW-033	Leased Out Exit Door	A'R'	12'x12"
7	1/30/09	BW-034	Leased Out 1	B'C'	12'x12"
8	1/30/09	BW-035	Leased Out 1	C'L	12'x12"
9	1/30/09	BW-036	Leased Out 2	D'L	12'x12"
10	1/30/09	BW-037	Leased Out 2	B'R'	12'x12"
11	1/30/09	BW-038	Leased Out 3		12'x12"
12	1/30/09	BW-039	Off Entrance 2	C'R'	12'x12"
13	1/30/09	BW-040	Entry 2	C'L	12'x12"
14	1/30/09	BW-041	Exterior At Loading Dock	D'C'	12'x12"
15	1/30/09	BW-042	Exterior In Parking Area	O'C'	12'x12"
16	1/30/09	BW-043	Exterior In Parking Area	D'C'	12'x12"
17	1/30/09	BW-044	Exterior At Garage	C'R'	12'x12"
18	1/30/09	BW-045	Exterior Perimeter Lot	C'R'	12'x12"
19	1/30/09	BW-046	Exterior Between Cranes	C'R'	12'x12"
20	1/30/09	BW-047	Exterior Between Cranes 2/3	C'C'	12'x12"

Requisitioned by M. White Date 1/30/09 Time 1:10

Received by Nora Gamble Date 1/30/09 Time 1:20 PM



Micron Environmental Labs

3567 Lexington Av.
El Monte, CA 91731

Analytical Method: EPA SW846-3050-7420
AIHA (ELPAT) ID No. 103012
CA ELAP Certificate NO. 2297

Date: 2/2/09
Micron Reference No. 10809006

Lead (Pb) In Wipes Summary Results

Project: ARC/ Offices and Exterior

Analyst: Daniel Gamez

Company: AAA Lead Consultants and Inspections, Inc.

Date Collected: 1/30/09

Address: 1307 W. Sixth St. Ste. 134

Date Received: 1/30/09

City, State, Zip Corona, CA 92682

Date Analyzed: 2/2/09

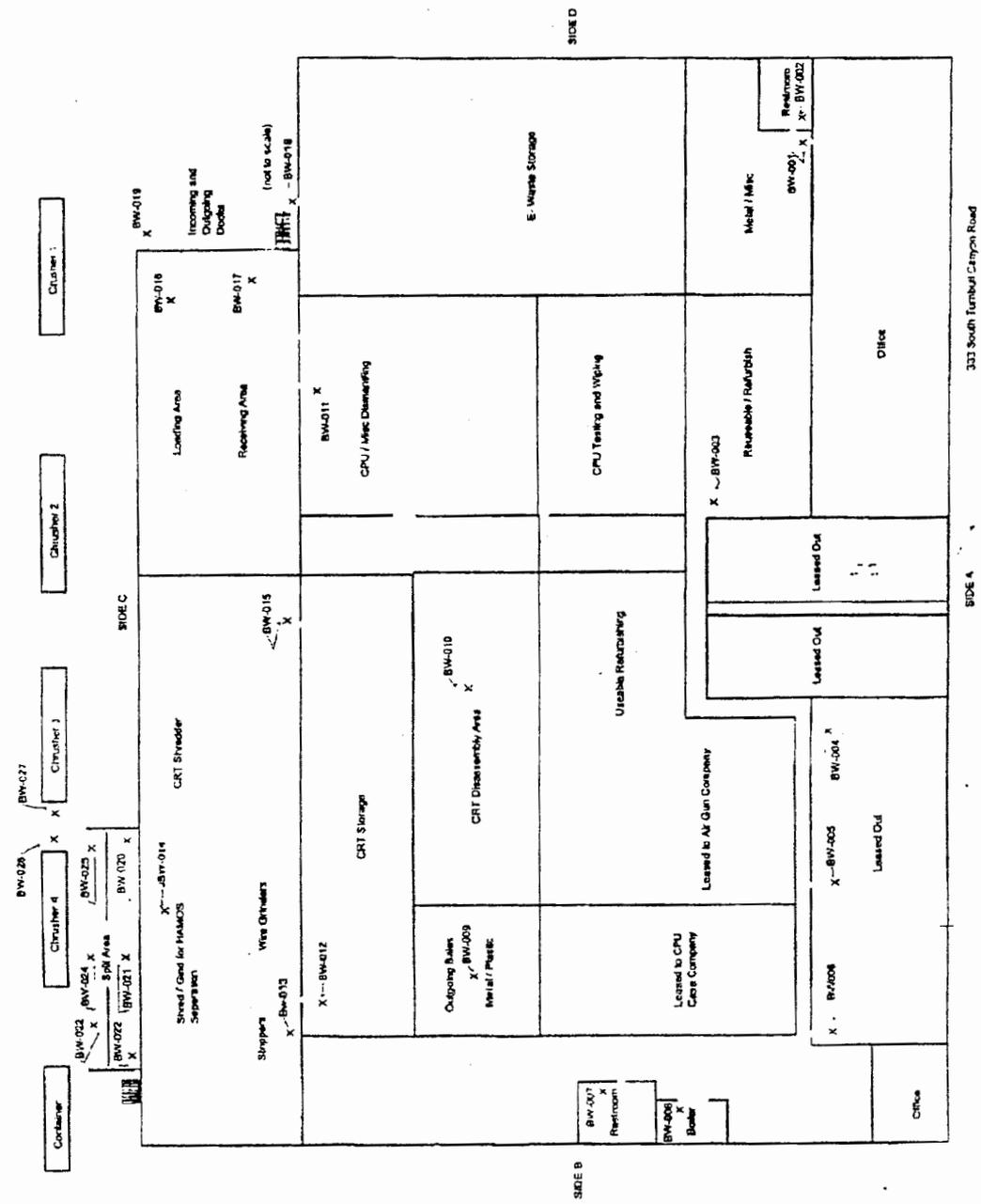
No. of samples: 20

Sample ID	Sample Description	Area Sampled(ft ²)	Vol. (ml)	DR. Factor	Conc. mg/L	Results ug/ft ²
BW-028	Dust Wipes	1.00	25	1	16.28	407.3
BW-029	Dust Wipes	1.00	25	1	7.02	175.5
BW-030	Dust Wipes	1.00	25	1	5.25	131.3
BW-031	Dust Wipes	1.00	25	1	5.33	133.3
BW-032	Dust Wipes	1.00	25	1	4.91	122.8
BW-033	Dust Wipes	1.00	25	1	2.90	72.5
BW-034	Dust Wipes	1.00	25	1	3.18	79.0
BW-035	Dust Wipes	1.00	25	1	3.15	78.8
BW-036	Dust Wipes	1.00	25	1	5.99	149.8
BW-037	Dust Wipes	1.00	25	1	4.66	116.5
BW-038	Dust Wipes	1.00	25	1	2.08	51.5
BW-039	Dust Wipes	1.00	25	1	2.46	61.5
BW-040	Dust Wipes	1.00	25	1	28.75	718.8
BW-041	Dust Wipes	1.00	25	1	15.57	389.3
BW-042	Dust Wipes	1.00	25	50	3.51	4387.5
BW-043	Dust Wipes	1.00	25	1	4.84	121.0
BW-044	Dust Wipes	1.00	25	1	27.59	689.8
BW-045	Dust Wipes	1.00	25	1	46.74	1168.5
BW-046	Dust Wipes	1.00	25	1	14.65	366.3
BW-047	Dust Wipes	1.00	25	1	10.41	260.3

ug/ft² = micrograms per square foot

MDL for Micron Labs = 4.177 ug/wipe

D. Gamez
Analyst Signature



333 South Turbul Canyon Road

Addendum 2

Work Plan for Lead Clean Up and Residual Substance
Removal

Dealing with Possible Mercury and Cadmium Contamination

SITE: ARC International, Inc.
LOCATION: Industry, California

At the request of Ellen Pates , project manager for the California Department of Toxic Substances Control (DTSC) a the ARC property at 333 Turnbull Canyon Road, Industry, California, additional sampling for mercury and cadmium is to be conducted locations in the main crushing area and in selected air vents in the office area to be designated by DTSC. Levels of mercury and cadmium must be at or below the levels indicated in the following table:

Analyte	EPA Reporting Limit ($\mu\text{g}/\text{m}^3$)	Health-Based Benchmark ($\mu\text{g}/\text{m}^3$)
Barium	200	110,000
Cadmium	20	1,560
Chromium	20	4,700
Copper	20	62,700
Mercury	0.4	157
Nickel	20	31,400

Following initial sampling, if levels of mercury or cadmium are above the identified Health-Based Benchmark indicated above, initial or additional cleaning of the specified areas will be required. Cleaning will reduce the levels of mercury and cadmium to levels acceptable to the DTSC as shown by verification sampling until such levels are achieved.

APPENDIX B
DTSC APPROVAL LETTER



Linda S. Adams
Secretary for
Environmental Protection



Department of Toxic Substances Control

Maziar Movassaghi
Acting Director
9211 Oakdale Avenue
Chatsworth, California 91311



Arnold Schwarzenegger
Governor

CERTIFIED MAIL

December 10, 2009

Mr. Wesley G. Dewsnap
Project Scientist
Earth Touch, Inc.
3135 N. Fairfield Road # D
Layton, Utah 84041

Subject: Work plan for 333 Turnbull Canyon Road, Industry, California (site property).

Dear Mr. Dewsnap:

The Department (DTSC) evaluated the closure plan requested for the closure activities of 333 Turnbull Canyon Road, Industry, California (site property), required by section 66273.76 of title 22 of the California Code of Regulations. Pursuant to section 66273.76, subsection (a)(1)(A), a closure plan must address the decontamination or removal of each universal waste treatment unit, other contaminated equipment, contaminated structures or contaminated soils, and the recycling or disposal of hazardous wastes. Section 66273.76, subsection (a)(1) requires that all of these actions be addressed in detail in the closure plan) structures or contaminated soils, and the recycling or disposal of hazardous wastes. Section 66273.76, subsection (a)(1) requires that all of these actions be addressed in detail in the closure plan.

The purpose of the facility closure process is to fully evaluate any contamination that may have resulted from authorized activities, and to decontaminate the facility to the extent necessary to protect human health and the environment. Part of this evaluation includes sampling and analysis of all areas and items which may have been contaminated, using sampling and analysis methodologies that provide results representative of facility contamination. DTSC regulations do not require the use of specific sampling and analysis methodologies, or prescribe a specific cleanup standard. The work plan submitted by Earth Touch Inc, on behalf of Zion Bank (responsible party), is a methodology that provides representative site characterization, and cleanup standard that will result in protecting the human health and the environment.

DTSC determines the adequacy of the areas and items to be sampled for contamination, the proposed sampling and analysis methodologies, and the cleanup standard on a case-by-case basis.

DTSC accepts the proposed work plan as in compliance with applicable regulations based on the site conditions as currently known and understood. By so accepting this workplan, DTSC does not waive any right to require changes or additional work based on actual site conditions as they become known and understood or based on changes to statutory or regulatory requirements.

If you have questions or concerns, please contact me at 818.717.6664.

Sincerely,



Ellen Pates, Hazardous Substances Scientist
Enforcement and Emergency Response Program
Chatsworth Office

Certified Mail
No. 7005 3110 0002 8425 6057
Return Receipt Requested

APPENDIX C
DAILY TAILGATE SAFETY MEETINGS
AND
DAILY FIELD ACTIVITY LOGS



Tailgate Safety Meeting

Project: ARC Decontamination and Site Clean Up

Location: 333 S. Turnbull Canyon Road, City of Industry, CA 91745

Project #: J/N 8250

Date: 1-4-09 **Time:** 0800

Safety Topics Presented

Work Tasks:

Start loading food products
Remove debris from up stairs
Segregate waste

Special Equipment:

Fork lifts Hand tools

Hazards:

Lifting, slips, trips & falls

Emergency Procedures:

call 911

Nearest Medical/Emergency Facility/Hospital/Clinic: Kaiser Permanente, 1011 Baldwin Park Blvd., Baldwin Park, CA 91706
Phone#: (800) 914-0793
Emergency Phone # (911) or: _____

New Suggestions/Actions Taken:

W/OTY THE PROPER PPE

I have completed the Safety and Health Training for this project and understand the requirements.

Printed Name	Signature
FRANK W. GONZALES	<i>[Signature]</i>
CESAR ANGUIANO	<i>[Signature]</i>
BORNABA LING	<i>[Signature]</i>
JAMES BONIFACIO	<i>[Signature]</i>
JESSE ANDRÉS TAGAY	<i>[Signature]</i>

Meeting Conducted by:

Julius Hannegan
Printed Name

[Signature]
Signature



Tailgate Safety Meeting

Project: ARC Decontamination and Site Clean Up

Location: 333 S. Turnbull Canyon Road, City of Industry, CA 91745

Project #: J/N 8250

Date: 1-5-09

Time: 0730

Safety Topics Presented

Work Tasks:

Finish loading food products
Remove Boxes From up stairs Area
Remove FILTERS From Vacuum Pumps

Special Equipment:

Fork lifts, Hand tools

Hazards:

Lifting, Slips Trips & Falls

Emergency Procedures:

Call 911

Nearest Medical/Emergency Facility/Hospital/Clinic: Kaiser Permanente, 1011 Baldwin Park Blvd., Baldwin Park, CA 91706
Phone#: (800) 914-0793
Emergency Phone # (911) or: _____

New Suggestions/Actions Taken:

Wear Proper PPE
 Get Help lifting heavy or bulky
 objects

I have completed the Safety and Health Training for this project and understand the requirements.

Printed Name	Signature
Jesse Vanderstam	<i>[Signature]</i>
Benjamin Luna	<i>[Signature]</i>
FRANK W. FLORES	<i>[Signature]</i>
Cesar Ambiano	<i>[Signature]</i>
Benjamin Parks	<i>[Signature]</i>

Meeting Conducted by:

Julius Hannegan
 Printed Name

[Signature]
 Signature



Tailgate Safety Meeting

Project: ARC Decontamination and Site Clean Up

Location: 333 S. Turnbull Canyon Road, City of Industry, CA 91745

Project #: J/N 8250

Date: 1-6-10

Time: 0930

Safety Topics Presented

Work Tasks:

Remove debris from process area

Special Equipment:

Fork lift

Hazards:

Slips trips & falls

Emergency Procedures:

Call 911

Nearest Medical/Emergency Facility/Hospital/Clinic: Kaiser Permanente, 1011 Baldwin Park Blvd., Baldwin Park, CA 91706

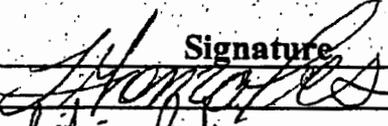
Phone#: (800) 914-0793

Emergency Phone # (911) or: _____

New Suggestions/Actions Taken:

Forklift Traffic
 Heavy Lifting
 Slips Trips & Falls

I have completed the Safety and Health Training for this project and understand the requirements.

Printed Name	Signature
FRANK W. GOMALES	
Bonifacio Paredes	Bonifacio Paredes
CESAR H. ABUJANO	
Bernabe Luna	Bernabe Luna
Jesse Vanderschuer	

Meeting Conducted by:

Julius Hannegan

Printed Name



Signature



Tailgate Safety Meeting

Project: ARC Decontamination and Site Clean Up

Location: 333 S. Turnbull Canyon Road, City of Industry, CA 91745

Project #: J/N 8250

Date: 1/7/10

Time: 0730

Safety Topics Presented

Work Tasks:

CLEAN DRIVEWAY, REMOVE DEBRIS FROM CONTAINERS

Special Equipment:

FORKLIFT

Hazards:

SLIPS, FALLS

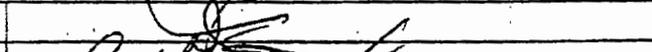
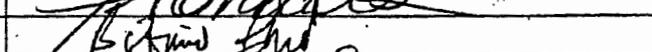
Emergency Procedures:

Nearest Medical/Emergency Facility/Hospital/Clinic: Kaiser Permanente, 1011 Baldwin Park Blvd.,
Baldwin Park, CA 91706
Phone#: (800) 914-0793
Emergency Phone # (911) or: _____

11/2/10

New Suggestions/Actions Taken:

I have completed the Safety and Health Training for this project and understand the requirements.

Printed Name	Signature
Julius Hannegan	
CESAR ANGLADES	
FRANK W. GONZALES	
GREGORIO BONIFALIO	
Bernabe LUNA	

Meeting Conducted by:

Julius Hannegan

Printed Name



Signature



Tailgate Safety Meeting

Project: ARC Decontamination and Site Clean Up

Location: 333 S. Turnbull Canyon Road, City of Industry, CA 91745

Project #: J/N 8250

Date: 1-11-10

Time: 0730

Safety Topics Presented

Work Tasks:

Pick up trash & debris & put into
Roll off Bin
Vacuum overhead area
Disconnecting elect

Special Equipment:

Fork lift, Hopa Vac, Roll off bin

Hazards:

Dust, Slips Trips & Falls
Misc Hand Tools

Emergency Procedures:

Call 911

Nearest Medical/Emergency Facility/Hospital/Clinic: Kaiser Permanente, 1011 Baldwin Park Blvd.,

Baldwin Park, CA 91706

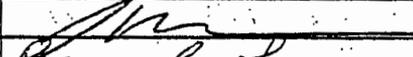
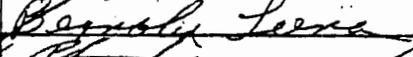
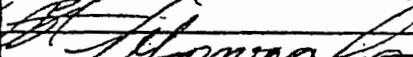
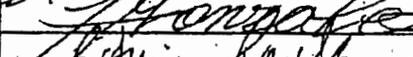
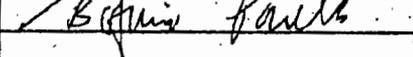
Phone#: (800) 914-0793

Emergency Phone # (911) or: _____

New Suggestions/Actions Taken:

Wear the proper PPE Keep work
 areas cleaned up

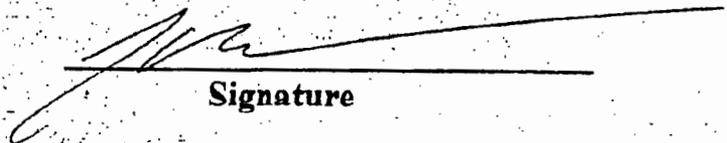
I have completed the Safety and Health Training for this project and understand the requirements.

Printed Name	Signature
Tesse Vanderstam	
Bernabe Lora	
Basilio Torres	
FRANK W. Gonzalez	
Bonifacio Pardo	

Meeting Conducted by:

Julius Hannegan

Printed Name



Signature



Tailgate Safety Meeting

Project: ARC Decontamination and Site Clean Up

Location: 333 S. Turnbull Canyon Road, City of Industry, CA 91745

Project #: J/N 8250

Date: 1-12-10

Time: 0730

Safety Topics Presented

Work Tasks:

Secure outside

Pressure washing

Special Equipment:

Sissor lifts, Pressure washer,
tornado vac, Air comb, Fork lift

Hazards:

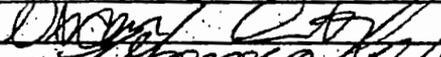
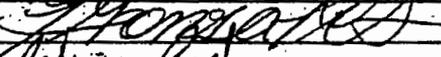
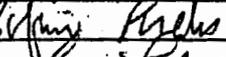
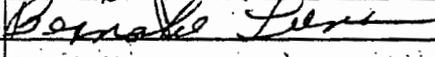
Falls, slips, trips & falls, High Pressure
water

Emergency Procedures:

Nearest Medical/Emergency Facility/Hospital/Clinic: Kaiser Permanente, 1011 Baldwin Park Blvd.,
Baldwin Park, CA 91706
Phone#: (800) 914-0793
Emergency Phone # (911) or: _____

New Suggestions/Actions Taken:

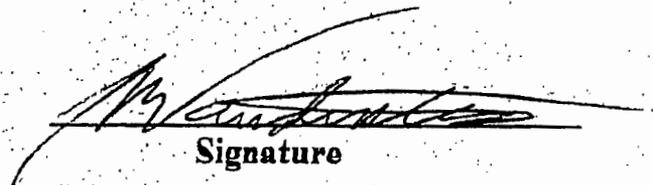
I have completed the Safety and Health Training for this project and understand the requirements.

Printed Name	Signature
USGAR ARMENTA	
FRANK W. GONZALES	
Bernatcio Pardo	
Bernabe Luna	

Meeting Conducted by:

Julius Hannegan

Printed Name



Signature



Tailgate Safety Meeting

Project: ARC Decontamination and Site Clean Up

Location: 333 S. Turnbull Canyon Road, City of Industry, CA 91745

Project #: J/N 8250

Date: 1-13-10

Time: 0730

Safety Topics Presented

Work Tasks:

Pressure washing

Special Equipment:

Pressure washers, scissor lifts, tornado vac, fork lift, misc hand tools

Hazards:

Falls, high pressure water, slips, trips, high pressure air

Emergency Procedures:

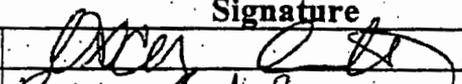
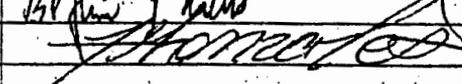
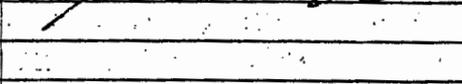
call 911

Nearest Medical/Emergency Facility/Hospital/Clinic: Kaiser Permanente, 1011 Baldwin Park Blvd., Baldwin Park, CA 91706
Phone#: (800) 914-0793
Emergency Phone # (911) or: _____

New Suggestions/Actions Taken:

Safety glasses, Hornies when on lift
Hard hats Boots gloves

I have completed the Safety and Health Training for this project and understand the requirements.

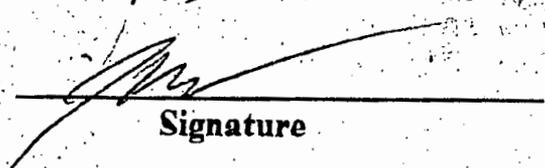
Printed Name	Signature
OSCAR ARMENTA	
Bernabe Luna	
San Juan Valdes	
FRANK W. GONZALES	

Meeting Conducted by:

113

Julius Hannegan

Printed Name



Signature



Tailgate Safety Meeting

Project: ARC Decontamination and Site Clean Up

Location: 333 S. Turnbull Canyon Road, City of Industry, CA 91745

Project #: J/N 8250

Date: 6-14-10 Time: 0730

Safety Topics Presented

Work Tasks:

Pressure Washing

Special Equipment:

Pressure Washers, Pumps & Vacuums
Scissor Lifts, Fork Lift, Hand Tools

Hazards:

Slips, Trips & Falls, High Pressure Water &
Air, Moving equipment, Loud Noises

Emergency Procedures:

Call 911

Nearest Medical/Emergency Facility/Hospital/Clinic: Kaiser Permanente, 1011 Baldwin Park Blvd.,
Baldwin Park, CA 91706
Phone#: (800) 914-0793
Emergency Phone # (911) or: _____

New Suggestions/Actions Taken:

Use the proper PPE Fall Protection
 Hardhats, Safety glasses, Hearing Protection
 Watch for moving equipment

I have completed the Safety and Health Training for this project and understand the requirements.

Printed Name	Signature
Jesse Vandersteg	<i>Jesse Vandersteg</i>
Frank W. Gonzalez	<i>Frank W. Gonzalez</i>
Oscar Am-ento	<i>Oscar Am-ento</i>
Bonifacio Lardo	<i>Bonifacio Lardo</i>
Bernabe Luna	<i>Bernabe Luna</i>

Meeting Conducted by:

Julius Hannegan

Printed Name

114
J. Hannegan
 Signature



Tailgate Safety Meeting

Project: ARC Decontamination and Site Clean Up

Location: 333 S. Turnbull Canyon Road, City of Industry, CA 91745

Project #: J/N 8250

Date: 1/18

Time: 0730

Safety Topics Presented

Work Tasks:

CONTINUE WASHING SECTION 2

Special Equipment:

PRESSURE WASHER, MANUAL, VACUUM

Hazards:

SLIPS, TRIPS, & FALLS, HIGH PRESSURE WASH WATER

Emergency Procedures:

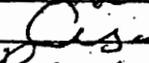
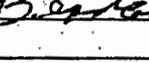
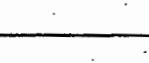
CALL 911

Nearest Medical/Emergency Facility/Hospital/Clinic: Kaiser Permanente, 1011 Baldwin Park Blvd.,
Baldwin Park, CA 91706
Phone#: (800) 914-0793
Emergency Phone # (911) or: _____

New Suggestions/Actions Taken:

Use The Proper PPE, Hard hats, Safety glasses,
Fall Protection, Slips Trips & Falls

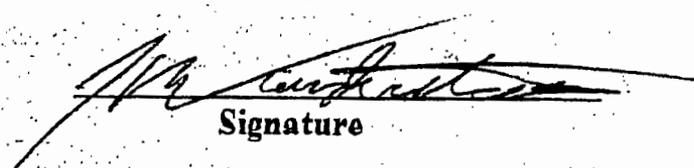
I have completed the Safety and Health Training for this project and understand the requirements.

Printed Name	Signature
Jesse Vanders Tooy	
Bullio Toiro	
OSCAR Armenta	
CESAR ANGUIANO	
Bernabe LUNA	

Meeting Conducted by:

Julius Hannegan

Printed Name



Signature



Tailgate Safety Meeting

Project: ARC Decontamination and Site Clean Up

Location: 333 S. Turnbull Canyon Road, City of Industry, CA 91745

Project #: J/N 8250

Date: 1-19-10

Time: 0730

Safety Topics Presented

Work Tasks:

clean overhead cabling & floors

Special Equipment:

Scissor lifts, Pressure Washers, Fork lift, Misc Hand tools

Hazards:

Slips trips & falls, Falling objects, Moving equipment, High pressure injections

Emergency Procedures:

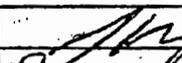
call 911

Nearest Medical/Emergency Facility/Hospital/Clinic: Kaiser Permanente, 1011 Baldwin Park Blvd., Baldwin Park, CA 91706
Phone#: (800) 914-0793
Emergency Phone # (911) or: _____

New Suggestions/Actions Taken:

USE THE PROPER PPE
Hard hats, Safety glasses, Fall Protection
Hearing protection

I have completed the Safety and Health Training for this project and understand the requirements.

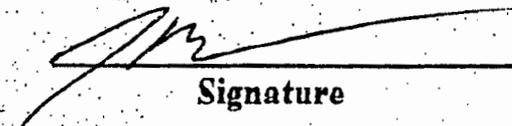
Printed Name	Signature
Jesse Vanderstoy	
Bernabe Luna	Bernabe Luna
CEGAR ANGLIANO	CA
OSCAR ARMENTA	Oscar Armenta
FRANK GONZALES	Frank Gonzales

Meeting Conducted by:

1-19-10

Julius Hannegan

Printed Name



Signature



Tailgate Safety Meeting

Project: ARC Decontamination and Site Clean Up

Location: 333 S. Turnbull Canyon Road, City of Industry, CA 91745

Project #: J/N 8250

Date: 1-20-10

Time: 0730

Safety Topics Presented

Work Tasks:

Wash floor of Room 2

Special Equipment:

Pressure Washers, Vacuum,

Hazards:

Slips, Trips, & Falls, High Pressure Water & Air

Emergency Procedures:

call 911

Nearest Medical/Emergency Facility/Hospital/Clinic: Kaiser Permanente, 1011 Baldwin Park Blvd., Baldwin Park, CA 91706
Phone#: (800) 914-0793
Emergency Phone # (911) or: _____

New Suggestions/Actions Taken:

Use the proper PPE Safety glasses
gloves, Boots, Tyvek

I have completed the Safety and Health Training for this project and understand the requirements.

Printed Name	Signature
Jesse Vandersloot	<i>[Signature]</i>
Bernabe Luna	<i>[Signature]</i>
Bradley Jones	<i>[Signature]</i>
Cesar Hernandez	<i>[Signature]</i>
FRANK W. GONZALES	<i>[Signature]</i>

Meeting Conducted by:

Julius Hannegan
Printed Name

[Signature]
Signature



Tailgate Safety Meeting

Project: ARC Decontamination and Site Clean Up

Location: 333 S. Turnbull Canyon Road, City of Industry, CA 91745

Project #: J/N 8250

Date: 1-21-10

Time: 0730

Safety Topics Presented

Work Tasks:

Wash ceilings in front room area
(room 3)

Special Equipment:

Pressure washer, scissor lifts,
high pressure air tools

Hazards:

Slips Trips & Falls, High pressure
injection

Emergency Procedures:

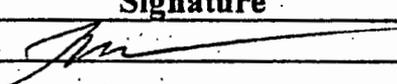
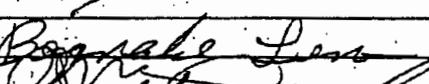
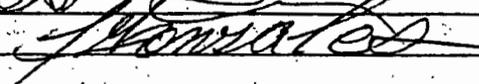
Call 911

Nearest Medical/Emergency Facility/Hospital/Clinic: Kaiser Permanente, 1011 Baldwin Park Blvd.,
Baldwin Park, CA 91706
Phone#: (800) 914-0793
Emergency Phone # (911) or: _____

New Suggestions/Actions Taken:

USE THE PROPER PPE: Hard hats,
 Safety glasses, Harnesses, gloves boots

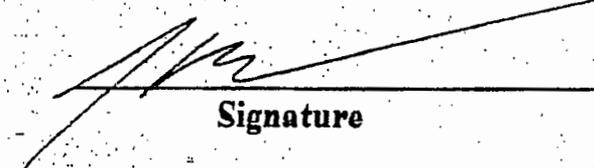
I have completed the Safety and Health Training for this project and understand the requirements.

Printed Name	Signature
Jesse Vandervorst	
CESAR ANGUIANO	
Bernabe Luna	Bernabe Luna
OSCAR ACMENTA	
FRANK GONZALES	

Meeting Conducted by:

Julius Hannegan

Printed Name



Signature



Tailgate Safety Meeting

Project: ARC Decontamination and Site Clean Up

Location: 333 S. Turnbull Canyon Road, City of Industry, CA 91745

Project #: J/N 8250

Date: 1-25-10 **Time:** 0730

Safety Topics Presented

Work Tasks:

Pressure wash ceiling & floor in Room 3

Special Equipment:

Scissor lifts, Pressure washers, Air Comp.
Fork lift, Misc Hand Tools

Hazards:

Slips Trips & Falls, High pressure injection
Moving equipment

Emergency Procedures:

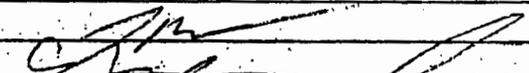
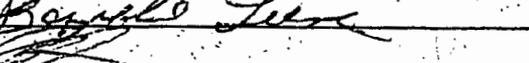
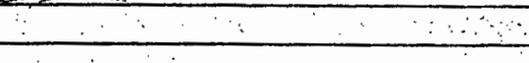
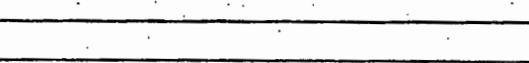
Call 911

Nearest Medical/Emergency Facility/Hospital/Clinic: Kaiser Permanente, 1011 Baldwin Park Blvd.,
Baldwin Park, CA 91706
Phone#: (800) 914-0793
Emergency Phone # (911) or: _____

New Suggestions/Actions Taken:

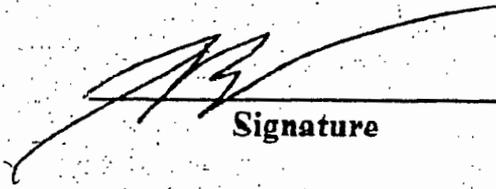
Use the proper PPE.
Fall Protection (harness)
Hard hats, Safety glasses, Boots gloves
Tyres

I have completed the Safety and Health Training for this project and understand the requirements.

Printed Name	Signature
Jesse Vanderstam	
Ear Anequina	
Frank Gonzales	
Bernabe Luna	
Blas Torres	

Meeting Conducted by:

Julius Hannegan
Printed Name


Signature 1-25-16



Tailgate Safety Meeting

Project: ARC Decontamination and Site Clean Up

Location: 333 S. Turnbull Canyon Road, City of Industry, CA 91745

Project #: J/N 8250

Date: 1-26-10

Time: 0730

Safety Topics Presented

Work Tasks:

Pressure washing ceiling & floor

Special Equipment:

Scissor lifts, pressure washers, forklift

Hazards:

Slips Trips Falls, High Pressure Injection

Moving equipment

Emergency Procedures:

Use the proper PPE

Call 911

Nearest Medical/Emergency Facility/Hospital/Clinic: Kaiser Permanente, 1011 Baldwin Park Blvd., Baldwin Park, CA 91706

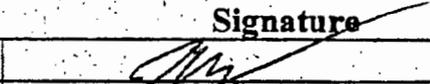
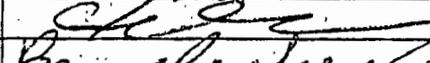
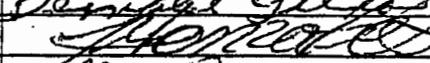
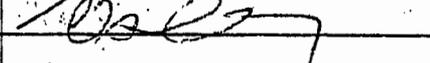
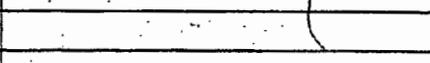
Phone#: (800) 914-0793

Emergency Phone # (911) or: _____

New Suggestions/Actions Taken:

Use The Proper PPE
Harness (Fall Protection)
Hard hats Safety glasses gloves Boots
Increased Ventilation

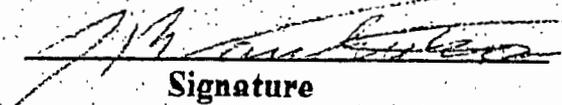
I have completed the Safety and Health Training for this project and understand the requirements.

Printed Name	Signature
Jesse Vonderstoy	
ESAR ANQUIANO	
Bernabe Luna	
FRANK GONZALES	
USCAR Armenta	

Meeting Conducted by:

Julius Hannegan

Printed Name



Signature



Tailgate Safety Meeting

Project: ARC Decontamination and Site Clean Up

Location: 333 S. Turnbull Canyon Road, City of Industry, CA 91745

Project #: J/N 8250

Date: 1-27-10 Time: 0730

Safety Topics Presented

Work Tasks:

Pressure wash outside equipment
& Asphalt around them

Special Equipment:

Fork lift, Pressure washers

Hazards:

Slips Trips Falls, high pressure injection

Emergency Procedures:

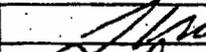
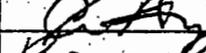
Call 911

Nearest Medical/Emergency Facility/Hospital/Clinic: Kaiser Permanente, 1011 Baldwin Park Blvd.,
Baldwin Park, CA 91706
Phone#: (800) 914-0793
Emergency Phone # (911) or: _____

New Suggestions/Actions Taken:

Use the proper PPE

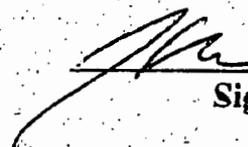
I have completed the Safety and Health Training for this project and understand the requirements.

Printed Name	Signature
JESS VANDERSTADT	
CEGAR ANGUIANO	
Bernabe Luna	Bernabe Luna
OSCAR ARMENGA	
FRANK GONZALES	

Meeting Conducted by:

Julius Hannegan

Printed Name



Signature



Tailgate Safety Meeting

Project: ARC Decontamination and Site Clean Up

Location: 333 S. Turnbull Canyon Road, City of Industry, CA 91745

Project #: J/N 8250

Date: 1-28-10 **Time:** 0730

Safety Topics Presented

Work Tasks:

Wash outside containers

Special Equipment:

pressure washers, Air comp, Fork lift

Hazards:

High pressure injection, slips, trips, falls
Moving equipment

Emergency Procedures:

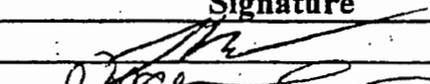
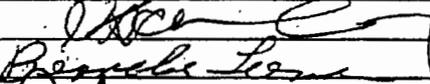
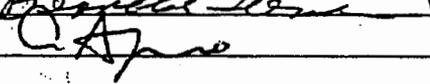
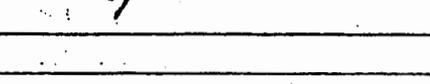
coll 911

Nearest Medical/Emergency Facility/Hospital/Clinic: Kaiser Permanente, 1011 Baldwin Park Blvd.,
Baldwin Park, CA 91706
Phone#: (800) 914-0793
Emergency Phone # (911) or: _____

New Suggestions/Actions Taken:

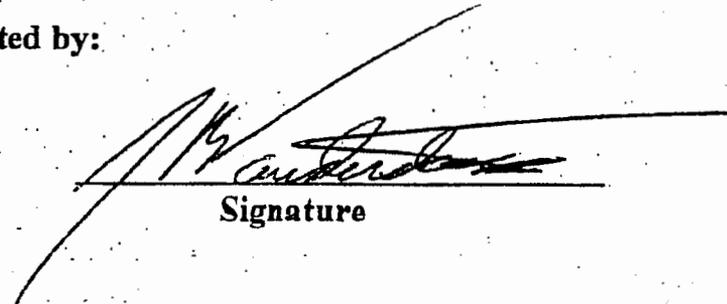
Use The Proper PPE
Safety glasses
gloves
Boots
tyvek
Hearing Protection

I have completed the Safety and Health Training for this project and understand the requirements.

Printed Name	Signature
Jesse Vandersteyn	
Joscar Armenta	
Bernabe Luna	
CESAR Anguiano	

Meeting Conducted by:

Julius Hannegan
Printed Name


Signature



Tailgate Safety Meeting

Project: ARC Decontamination and Site Clean Up

Location: 333 S. Turnbull Canyon Road, City of Industry, CA 91745

Project #: J/N 8250

Date: 2-6-10

Time: 0730

Safety Topics Presented

Work Tasks:

Re clean south end of room due

Special Equipment:

Scissor lifts, Pressure washers,
Air compressor & pumps

Hazards:

Slips Trips & Falls, High Pressure interaction

Emergency Procedures:

call 911

Nearest Medical/Emergency Facility/Hospital/Clinic: Kaiser Permanente, 1011 Baldwin Park Blvd., Baldwin Park, CA 91706

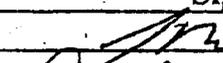
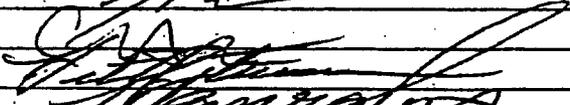
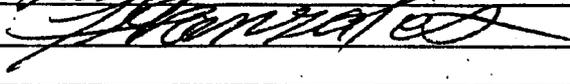
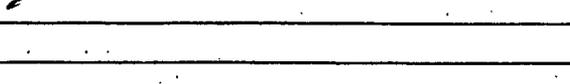
Phone#: (800) 914-0793

Emergency Phone # (911) or: _____

New Suggestions/Actions Taken:

USE THE PROPER PPE
Fall protection
Safety glasses
Work Boots
gloves
tyvelks

I have completed the Safety and Health Training for this project and understand the requirements.

Printed Name	Signature
Jesse Vanderstacy	
Cesar Aguiar	
Hector Dominguez	
FRANK GARCIA	

Meeting Conducted by:

Julius Hannegan
Printed Name

Signature



Tailgate Safety Meeting

Project: ARC Decontamination and Site Clean Up

Location: 333 S. Turnbull Canyon Road, City of Industry, CA 91745

Project #: J/N 8250

Date: 2-2-10

Time: 0730

Safety Topics Presented

Work Tasks:

Pressure wash outside area

Special Equipment:

Pressure washer, Air Comp.

Hazards:

Slip Trips Falls, High Pressure Injection

Emergency Procedures:

call 911

Nearest Medical/Emergency Facility/Hospital/Clinic: Kaiser Permanente, 1011 Baldwin Park Blvd., Baldwin Park, CA 91706

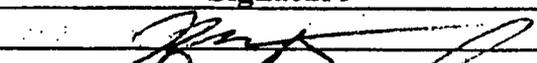
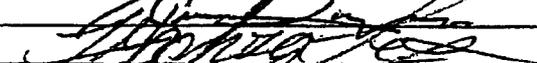
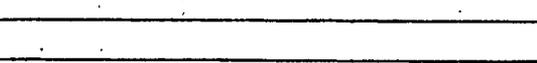
Phone#: (800) 914-0793

Emergency Phone # (911) or: _____

New Suggestions/Actions Taken:

USE THE PROPER PPE

I have completed the Safety and Health Training for this project and understand the requirements.

Printed Name	Signature
Jesse Vanderstacy	
CESAR ANGUIANO	
FRANK GONZALES	
HEAR OFFICERS	

Meeting Conducted by:

Julius Hannegan

Printed Name

Signature

2-7-10



Daily Field Activity Log

Project Name: EarthTouch, Inc/ARC

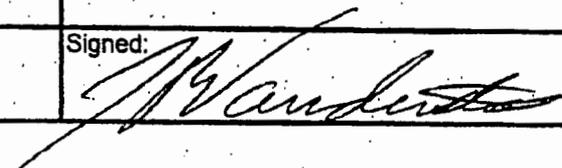
Location: 333 S. Turnbull Canyon Road, City of Industry, CA 91745

Project Number: 8250

Date: 1-6-00

Page ___ of ___

Time	Description of Activities
0730	Safety meeting
0740	Begin cleaning out CRT Room
	Spread Absorbent on and spilled food waste & start scraping it up
0930	Break
	Continue tasks
1130	Lunch
	David w/ Scrap America on site removing Recyclables
	Finish clearing debris from CRT Room
	Begin disassembling Vacuums in prep to clean out
	Discovered several live (500 Volt) wires requiring an electrician to secure
1530	Secure Area

Visitors on Site: David Crosby Ivan Cortez	Additional Comments:
Weather Conditions: Fair	Signed: 

JCE ENVIRONMENTAL COMPANY, INC.

HAZARDOUS MATERIAL CLEANUP

Daily Field Activity Log

Project Name: EarthTouch, Inc/ARC

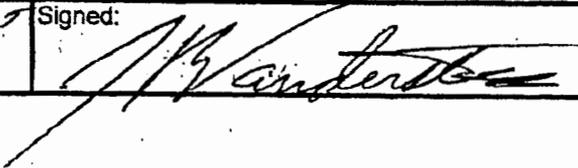
Location: 333 S. Turnbull Canyon Road, City of Industry, CA 91745

Project Number: 8250

Date: 1-8-10

Page of

Time	Description of Activities
0700	No Safety meetings, No change in work
	Begin Vacuuming overhead Area w/ Hepa Vac
	Continue Dismantling machines to be washed
	Continue to remove Recyclable materials
0930	Break
0900	Load Debris into Tolloff Bin
	had all High Voltage disconnected by Englbach Electric
1130	Lunch
	Continue Vacuuming overhead Area
	Continue breaking down equipment for washing
	Continued removal of recyclables
1500	Secure Area

Visitors on Site: <u>Scrap America</u> <u>Citadel Environmental</u> <u>Englbach Elect</u> <u>CITY FIRE DEPT</u>	Additional Comments:
Weather Conditions: <u>PROPERTY MANAGEMENT</u> <u>Good</u>	Signed: 

JCE ENVIRONMENTAL COMPANY, INC.

HAZARDOUS MATERIAL CLEANUP

Daily Field Activity Log

Project Name: EarthTouch, Inc/ARC

Location: 333 S. Turnbull Canyon Road, City of Industry, CA 91745

Project Number: 8250

Date: 1-12-10

Page ___ of ___

Time	Description of Activities
0730	Safety Meeting
	Secure out side Areas for pending Rain
	Secure doorways interior rooms
0830	Begin Pressure Washing The East Room
0930	Break
	Continue washing
1130	Lunch
	Continue washing
1530	Secure Area for Night

Visitors on Site: <u>Electricians</u> <u>Buyer Contractors</u>	Additional Comments:
Weather Conditions: <u>Fair & cloudy</u>	Signed: <u>[Signature]</u>

JC ENVIRONMENTAL COMPANY, INC.

HAZARDOUS MATERIAL CLEANUP

Daily Field Activity Log

Project Name: EarthTouch, Inc/ARC

Location: 333 S. Turnbull Canyon Road, City of Industry, CA 91745

Project Number: 8250

Date: 1-13-10

Page of

Time	Description of Activities
0730	Safety meeting Stressed Falls of High pressure
0800	begin securing remaining doors between rooms
	Break in over night No AROVENT ITEMS stolen
2hr	Down Time on Pressure washer for repairs
	Finish washing ceiling & walls
	Need Bigger pump for water transfer
1230	Lunch
	washing floor
	Fork lift broken hydraulic hose Needs repair
1530	Secure Site

Visitors on Site: Buyer (Property)
Poller Company

Additional Comments:

Weather Conditions:
Rain

Signed:
[Signature]

JCE ENVIRONMENTAL COMPANY, INC.

HAZARDOUS MATERIAL CLEANUP

Daily Field Activity Log

Project Name: EarthTouch, Inc/ARC

Location: 333 S. Turnbull Canyon Road, City of Industry, CA 91745

Project Number: 8250

Date: 1-14-10

Page of

Time	Description of Activities
0730	Safety meeting CL
	Change up washing method a little
	Using bigger pumps to transfer water
	unit-d pumps
	Repair hydraulic hose on Fork lift
0930	Break
	Continued washing
1130	Lunch
	Delivery of 275 gallon Totes (#) 12
1400	Finish washing room
	Start cleaning loading docks
1530	Secure Area

Visitors on Site: Wes Dewarup - EarthTouch	Additional Comments:
Weather Conditions:	Signed:

JC ENVIRONMENTAL COMPANY, INC.

HAZARDOUS MATERIAL CLEANUP

Daily Field Activity Log

Project Name: EarthTouch, Inc/ARC

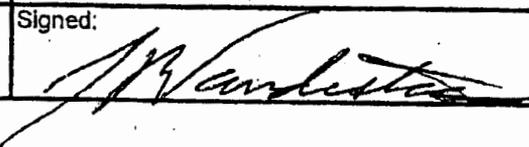
Location: 333 S. Tumbull Canyon Road, City of Industry, CA 91745

Project Number: 8250

Date: 1-15-10

Page 1 of 1

Time	Description of Activities
0730	No change in operation No Safety Meeting
	Continue to clean decking areas & cleanup food Area
	Begin wash ceiling in food Area
	Finish cleaning decks
	Take down overhead signage & vent duct
	PSI room complete
1130	Lunch
	Remove carpet in office Area
	Continue washing ceiling
1545	Secure for weekend

Visitors on Site: <p style="text-align: center;">None</p>	Additional Comments: <p style="text-align: center;">None</p>
Weather Conditions: <p style="text-align: center;">Good</p>	Signed: 

JC ENVIRONMENTAL COMPANY, INC.

HAZARDOUS MATERIAL CLEANUP

Daily Field Activity Log

Project Name: EarthTouch, Inc/ARC

Location: 333 S. Turnbull Canyon Road, City of Industry, CA 91745

Project Number: 8250

Date: 1-19-10

Page of

Time	Description of Activities
0730	Safety Meeting
	Continue to wash ceiling & walls
	hanging poly curtains next to office areas
0930	Break
	Finish washing ceiling & next to offices
1130	Brunch Break
	Start washing the floor in Room 2
1530	Secure Area

Visitors on Site: <p style="text-align: center; font-size: 1.2em;">None</p>	Additional Comments: <p style="text-align: center; font-size: 1.2em;">None</p>
Weather Conditions: <p style="text-align: center; font-size: 1.2em;">Rain</p>	Signed: <p style="text-align: center; font-size: 1.5em;"><i>[Signature]</i></p>

JCE ENVIRONMENTAL COMPANY, INC.

HAZARDOUS MATERIAL CLEANUP

Daily Field Activity Log

Project Name: EarthTouch, Inc/ARC

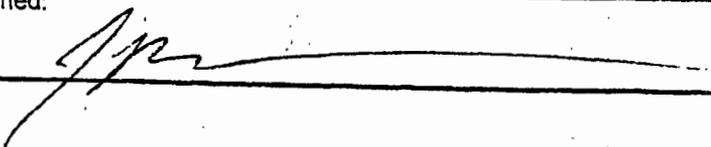
Location: 333 S. Turnbull Canyon Road, City of Industry, CA 91745

Project Number: 8250

Date: 1-21-10

Page ___ of ___

Time	Description of Activities
0730	Safety meeting
	Wash chemical Room Next to main street Pennel
	Move operation into Room 3 to start washing ceiling, Hang curtains to protect offices
0930	Break
	then move all waste & misc equip into Room 1 to make room to wash Room 3
	Start washing Room 3
1130	Lunch
	Continued
1530	Secure site
	Work on Friday will resume on Monday 1-25-10

Visitors on Site: <div style="font-size: 1.2em; margin-left: 20px;">Unid RINTS</div>	Additional Comments:
Weather Conditions: <div style="font-size: 1.2em; margin-left: 20px;">Rain</div>	Signed: <div style="font-size: 1.5em; margin-left: 20px;">  </div>

JCE ENVIRONMENTAL COMPANY, INC.

HAZARDOUS MATERIAL CLEANUP

Daily Field Activity Log

Project Name: EarthTouch, Inc/ARC

Location: 333 S. Turnbull Canyon Road, City of Industry, CA 91745

Project Number: 8250

Date: 1-26-10

Page of

Time	Description of Activities
0730	Safety meeting
	275 gallons of Rinseate generated
	Continue to wash ceiling & floor in room 3
0930	Break
	Ceiling completed continue on floor
1130	Lunch
	Finish floor Move equipment to begin cleaning outside containers tomorrow
	Palloff bin delivered by United Pumping start loading remaining debris (Non Haz) into the R.O. Bin
1530	Secure site
	ONSITE INJURY Frank pinched his foot between fork lift & building support

Visitors on Site: Boyers Costelut

Additional Comments:

Weather Conditions:
Cloudy Rain

Signed:

J C ENVIRONMENTAL COMPANY, INC. HAZARDOUS MATERIAL CLEANUP

Daily Field Activity Log

Project Name: EarthTouch, Inc/ARC

Location: 333 S. Turnbull Canyon Road, City of Industry, CA 91745

Project Number: 8250

Date: 1-27-10

Page of

Time	Description of Activities
0730	Safety meeting
	Move washing equipment out side of
	begin washing containers & contents
	Moving Trash & Debris into Roll off bin
0930	Break
	Continue to wash & move debris
1130	Lunch
	Continue to wash & move debris
	Finish Loading debris
1530	Secure Site
	2 Totes generated outside today
	(3 Totes generated in Room 3)
	(4 Totes generated in Room 2)
	(6 Totes generated in Room 1)

Visitors on Site: <p style="text-align: center; font-size: 1.5em;">None</p>	Additional Comments: <p style="text-align: center; font-size: 1.5em;">None</p>
Weather Conditions: <p style="text-align: center; font-size: 1.5em;">Sunny</p>	Signed: <p style="text-align: center; font-size: 1.5em;"><i>[Signature]</i></p>

JC ENVIRONMENTAL COMPANY, INC.

HAZARDOUS MATERIAL CLEANUP

Daily Field Activity Log

Project Name: EarthTouch, Inc/ARC

Location: 333 S. Turnbull Canyon Road, City of Industry, CA 91745

Project Number: 8250

Date: 1-28-10

Page ___ of ___

Time	Description of Activities
0730	Safety Meeting
	Continue to wash outside containers & areas around them
0930	Break
	Finish washing outside containers
	Wash oil area in back of building
1130	Lunch
	Wash area in front of East dock & pump
	3 1/2 Totals of Rinseate generated outside Areas
1530	Secure Site

Visitors on Site:	Additional Comments:
Weather Conditions:	Signed:

APPENDIX D
SUMMARY LIST
AND
MANIFESTS / BILLS OF LADING

Summary List
Waste disposal and non-regulated waste/equipment transportation summary
from ARC, International , 333 Turnbull Canyon Road, Industry, CA
(EPA ID No. CAC002651229)

No Date: Straight Bill of Lading
 Transporter: Scrap America
 21 units scrap cardboard, steel, pallets
 To: Scrap America 940 Fairview Way Place, Rancho Cucamonga, CA

 Straight Bill of Lading
 Transporter: Scrap America
 17 units scrap cardboard, plastic, steel, pallets, desks, and chairs
 To: Scrap America 940 Fairview Way Place, Rancho Cucamonga, CA

 Straight Bill of Lading
 Transporter: TRV Transport
 1 pallet (120 pounds) Universal Wastes CRT Devices
 1 pallet (600 pounds) Universal Waste Printed Circuit Boards
 5 pallets (900 pounds) Universal Wastes (Electronic Devices)
 To: Cali Resources, 2310 Michael Faraday Drive, San Diego, CA

 Straight Bill of Lading
 Transporter: TRV Transport
 Office Supplies (7,500 pounds)
 7 pallets (210 pounds) Cardboard Containers
 To: Cali Resources, 2310 Michael Faraday Drive, San Diego, CA

30-Dec-2009 Straight Bill of Lading
 Transporter: TRV Transport
 9 pallets (950 pounds) office supplies, partitions, desks, chairs)
 To: Cali Resources, 2310 Michael Faraday Drive, San Diego, CA

 Straight Bill of Lading
 Transporter: TRV Transport
 1 carton (350 pounds) universal Waste (CRT Devices)
 1 piece (150 pounds) Universal Waste CRT Device
 15 pallets (7,300 pounds) Universal Waste Electronic Devices
 To: Cali Resources, 2310 Michael Faraday Drive, San Diego, CA

7-Jan-2010 Trip Log Number 3852706-B
 Transporter Art's Tires
 625 tires
 To: Art's Tires

8-Jan-2010 Straight Bill of Lading
Transporter: JC Environmental(0182010-01)
7 cartons (175 pounds) Universal Waste Lamps
To JC Environmental, 6630 Camino Maquiladora, San Diego, CA

Straight Bill of Lading
Transporter: JC Environmental (0182010-02)
5 pieces (300 pounds) appliances (useable) refrigerator and freezer
To JC Environmental, 2504 Transportation Avenue, Suite C, National City, CA

Straight Bill of Lading
Transporter: JC Environmental (01082010-09)
2 drums (218 pounds) Universal Waste alkaline batteries
To JC Environmental, 6630 Camino Maquiladora, San Diego, CA

18-Feb-2010 Non-Hazardous Waste Manifest 88273
Transporter: United Pumping Service (CAD072953771)
40 yards Non-Hazardous Waste Solid, (debris)
TSDf: Filter Recycling Services, 180 W. Monte Avenue, Rialto, CA
(CAD982444481)

11-Mar-2010 Straight Bill of Lading
Transporter: TRV Transport
11,400 pounds scrap machinery, vent ducts, cardboard drums
To: Cali Resources, 2310 Michael Faraday Drive, Dan Diego, CA

14-Apr-2010 Straight Bill of Lading
Transporter: Advanced Chemical Transport
75 empty totes 1,425 pounds
35 pounds empty 55 gallon drum
32 pounds empty 30 gallon drum
To: Apex Drum Company, 6226 Ferguson Drive, Commerce, CA

19-Apr-2010 Hazardous Waste manifest 0070144440JJK
Transporter: United Pumping Service (CAD072953771)
30 yards NA3077 Hazardous Wastes, Solid, n.o.s. (Lead, Mercury)
TSDf: U.S. Ecology Nevada, Inc., P.O. Box 578, Hwy 95, 11 Miles S. Beatty,
Beatty, NV (NVT330010000)

Hazardous Waste Manifest 0031943868FLE
Transporter: United Pumping Service (CAD072953771)
30 yards Hazardous Wastes Solids (Lead, Mercury)
TSDf: U.S. Ecology Nevada, Inc., P.O. Box 578, Hwy 95, 11 Miles S. Beatty,
Beatty, NV (NVT330010000)

Hazardous Waste Manifest 007014442JJK

Transporter: Advanced Chemical Transport (CAR000070540)
20 gallons Isocyanate solutions
45 gallons waste amines, liquid
30 yards Hazardous Wastes Solids (Lead, Mercury)
TSDF: U.S. Ecology Nevada, Inc., P.O. Box 578, Hwy 95, 11 Miles S. Beatty,
Beatty, NV (NVT330010000)

Hazardous Waste Manifest 007014479JJK
Transporter: United Pumping Service (CAD072953771)
12,000 pounds Non-RCRA Hazardous Wastes, Solid (Decon Debris)
TSDF: Filter Recycling Services, Inc., 180 W. Monte Avenue, Rialto, CA
CAD98244481

Hazardous Waste Manifest 004427311JJK
Transporter: United Pumping Service (CAD072953771)
5,300 gallons Non-RCRA Hazardous Waste Liquid (Rinse Water)
TSDF: Copper Mountain Landfill, 34583 E. County 12th Street, Wellton, AZ
(4133)

Non-Hazardous Waste Manifest SD-23391
Transporter: Advanced Chemical Transport (CAR000070540)
14 drums non-hazardous waste, solid (food flavoring)
TSDF: Filter Recycling Services, Inc., 180 W. Monte Avenue, Rialto, CA
CAD98244481

Hazardous Waste Manifest 007014441JJK
Transporter 1: Advanced Chemical Transport (CAR000070540)
Transporter 2: SLT Express Way, Inc (ARK00050851)
260 pounds waste paint
TSDF: Rinco Chemical Industries, Inc (ARD981057870), 1007 Vulcan Road
Haskell, Benton, Arkansas 72015

4-Mar-2010 Hazardous Waste Manifest 007044508JJK
Transporter: Advanced Chemical Transport (CAR000070540)
8 gallons waster flammable liquid (petroleum distillates)
TSDF: ARC International, 333 Turnbull Canyon Road, City of Industry, CA
(CAR0000180257) FROM: Filter Recycling Services, Inc 180 West Monte
Avenue, Rialto, CA MANIFEST REFERENCE NUMBER 007014441JJK

19-Mar-2010 Straight Bill of Lading
Transporter: Cali Resources, Inc
1-40 foot shipping container (10,000 pounds)
To: Cali Resources, 2310 Michael Faraday Drive, San Diego, CA

Straight Bill of Lading
Transporter: Cali Resources, Inc

1-40 foot shipping container (10,000 pounds)
To: Cali Resources, 2310 Michael Faraday Drive, San Diego, CA

Straight Bill of Lading
Transporter: Cali Resources, Inc
14- pieces equipment with lead based paint (11,000 pounds)
To: Cali Resources, 2310 Michael Faraday Drive, San Diego, CA

20-Apr-2010 Straight Bill of Lading
Transporter: Cali Resources, Inc
1-20 foot shipping container (7,000 pounds)
To: Cali Resources, 2310 Michael Faraday Drive, San Diego, CA

Straight Bill of Lading
Transporter: Cali Resources, Inc
1-40 foot shipping container (10,000 pounds)
To: Cali Resources, 2310 Michael Faraday Drive, San Diego, CA

25-Apr-2010 Straight Bill of Lading
Transporter: Cali Resources, Inc
1-40 foot shipping container (10,000 pounds)
To: Cali Resources, 2310 Michael Faraday Drive, San Diego, CA

27-Apr-2010 Straight Bill of Lading
Transporter: Cali Resources, Inc
1-40 foot shipping container (10,000 pounds)
To: Cali Resources, 2310 Michael Faraday Drive, San Diego, CA

Straight Bill of Lading
Transporter: Cali Resources, Inc
4- pieces equipment with lead based paint (54,000 POUNDS)
Bailer, shear, 2 dust collectors
To: Cali Resources, 2310 Michael Faraday Drive, San Diego, CA

Service Order 1485294
Transporter: Asbury Environmental Services (CAD028277036)
200 pounds Used Oil
To Advanced Environmental Services, Inc. 13579 Whittram Avenue, Fontana,
CA (CAT080025711)

6-May-2010 Hazardous Waste Manifest 007014604 JJK
Transporter 1: JC Environmental (CAL000209875)
Transporter 2: Advanced Chemical Transport (CAR000040540)
200 pounds Hazardous waste Solid, NOS (Lead, Mercury)
TSDf: U.S. Ecology Nevada, Inc., P.O. Box 578, Hwy 95, 11 Miles S. Beatty,
Beatty, NV (NVT330010000)

Straight Bill of Lading
Transporter: JC Environmental
40 pounds Empty Drums previously containing oil
To: Bureno Drum Company, 55 W. Alondra Boulevard, Gardena, CA

STRAIGHT BILL OF LADING - SHORT FORM

ORIGINAL - NOT NEGOTIABLE

Shipper's No. _____

Carrier's Name: SCRAP AMERICA

Carrier's No. _____

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading.

333 TURNBULL CANYON RD
CITY OF INDUSTRIAL, CA (Date)

FROM ZIONS FIRST NATIONAL BANK

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, counted, and destined as shown below, which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in the Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

(Mail or street address for purposes of notification only)

Consigned TO SCRAP AMERICA

On Collect on Delivery Shipments, the letters "C.O.D." must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

Destination 9400 FAIRVIEW WAY PL Street RANCHO CUCUMBER City _____
County _____ State CA Zip 91730

Route _____ Delivery Address ★

(*To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)

Delivering Carrier _____ Car or Vehicle Initials and No. _____

Collect on Delivery \$ _____ And Remit to _____

Street _____ City _____ State _____

No. Packages	H.M.	Kind of Package, Description of Articles, Special Marks, and Exceptions	Weight (Subject to Correction)	Class or Rate	Check Column
21		SCRAP CARDBOARD, STEEL, PALLETS			

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.
NOTE:—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

JULIUS HANSEN on BEHALF OF ZION Shipper, Per _____

Permanent post-office address of shipper.

Per _____

Agent

Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse to the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of consignor)

C. O. D. Charges to be

Paid by Shipper Consignee

If charges are to be prepaid, write or stamp here, "To be Prepaid."

Received \$ _____ to apply in prepayment of the charges on the property described herein.

Agent or Cashier

Per _____
(The signature here acknowledges only the amount prepaid.)

Charges Advanced:

\$ _____
*The fibre containers used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Rule 41 of the Uniform Freight Classification and Rule 5 of the National Motor Freight Classification.
† Shipper's imprint in lieu of stamp; not a part of bill of lading approved by the Interstate Commerce Commission.

1

STRAIGHT BILL OF LADING - SHORT FORM

ORIGINAL - NOT NEGOTIABLE

Shipper's No. _____

Carrier's Name: SCRAP America

Carrier's No. _____

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of lading.

at 333, TURNBULL CANYON RD FROM ZIONS FIRST NATIONAL BANK
CITY OF INDUSTRY CA (Date)

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and delivered as shown below, which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water, line, highway, route or route, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time unseparated in all or any of said property that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in the Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

(Mail or street address for purposes of notification only.)

Consigned TO SCRAP America
 On Collect on Delivery Shipments, the letters "COO" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.
 Destination 9400 FAIRVIEW WAY PL Street RANCHO CUCAMONGA City
 County CA State 91730 Zip
 Route _____ Delivery Address *

Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
 The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of consignee)

Delivering Carrier _____ Car or Vehicle Initials and No. _____
 Collect on Delivery \$ _____ And Remit to _____

C. O. D. Charges to be
 Paid by
 Shipper Consignee

If charges are to be prepaid, write or stamp here, "To be Prepaid."

Street _____ City _____ State _____

No. Packages	H.M.	Kind of Package, Description of Articles, Special Marks, and Exceptions	Weight (Subject to Conditonary)	Class or Rate	Check Column
17		SCRAP CARDBOARD, PLASTIC, STEEL, AND PALLETS; DESKS + CHAIRS			

Received \$ _____ to apply in prepayment of the charges on the property described hereon.

Agent or Cashier

Per _____
(The signature here acknowledges only the amount prepaid.)

Charges Advanced:

*The flaps contained used for this shipment conform to the specifications set forth in "box maker's" certificates thereon, and all of requirements of Rule 41 of the Uniform Freight Classification and Rule 5 of the National Motor Freight Classification."
 *Shipper's imprint in lines of stamp; not a part of bill of lading approved by the Interstate Commerce Commission.

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.
 NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per

JULIUS HANSEN on behalf of ZIONS
 Shipper, Per _____
 Permanent post-office address of shipper, _____

Agent _____
 Per _____

THIS MEMORANDUM

is an acknowledgement that a Bill of Lading has been issued and is not the Original Bill of Lading, nor a copy or duplicate, covering the property named herein, and is intended solely for filing or record.

Shipper's No. _____

Carrier's Name: TRU. TRANSP. ROCIU WAKENZIEHA Carrier's No. _____

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of lading,
333 S. TURNBULL CANYON RD
 at LAVERGNE CA (Date) _____ FROM ZIONS FIRST NATIONAL BANK

the property described below, in apparent good order, except as noted (contents and condition of containers of packages unknown), marked, consigned and destined as shown below, which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of the highway operations otherwise to deliver to another carrier on the route to said destination if it mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Freight Bill of Lading set forth (1) in the Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his agents.

(Mail or street address for purposes of notification only.)

Consigned TO CALL RESOURCEZ
On Collect on Delivery Shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

Destination 2310 MICHAEL FARADA ST City SAN DIEGO
 County CA State 92116 Zip _____

Route _____ Delivery Address _____

(*To be filled in only when shipper desires and governing tariffs provide for delivery thereof.)

Delivering Carrier _____ Car or Vehicle Initials and No. _____

Collect on Delivery \$ _____ And Remit to _____

Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse on the consignee, the consignee shall sign the following statement:
 The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of consignee)

C. O. D. Charges to be Paid by
 Shipper Consignee

If charges are to be prepaid, write or stamp here, "To be Prepaid."

No. Packages	H.M.	Kind of Package, Description of Articles, Special Marks, and Exceptions	Weight (Subject to Correction)	Class or Rate	Check Column
1 PA		UNIVERSAL WASTE, CRT DEVICES	130P		
1 PA		UNIVERSAL WASTE, PRINTED CIRCUIT BOARDS	660P		
2		UNIVERSAL WASTE, ELECTRONIC DEVICES	900P		

Received \$ _____ to apply in prepayment of the charges on the property described herein.

Agent or Cashier _____

For (The signature here acknowledges only the amount prepaid.)
 Charges Advanced: _____

1 The fibre containers used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Rule 41 of the Uniform Freight Classification and Rule 5 of the National Motor Freight Classification.
 2 Shipper's intent is flow of stamp; not a part of bill of lading approved by the Interstate Commerce Commission.

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.
 NOTE — Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

Shirley HANCOCK ON BEHALF OF ZIONS Shipper, Per _____ Agent

Permanent post-office address of shipper: _____ Per _____

3

THIS MEMORANDUM

is an acknowledgement that a Bill of Lading has been issued and is not the Original Bill of Lading, nor a copy or duplicate, covering the property named herein, and is intended solely for filing or record.

Shipper's No. _____

Carrier's Name: TRV. TRANSP. ROLIC VALENZUELA Carrier's No. _____

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading,
233 S. TURNBULL CANYON RD
 at CITY OF INDUSTRY, CA (Date) _____ FROM ZIONS FIRST NATIONAL BANK

the property described below, in apparent good order except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as shown below which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes or within the territory of its highway operations otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each error of all or any of said property over all or any portion of said route to destination, and as to each party at any time increased in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in the Uniform Freight Classification in effect on the date hereof if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

Consigned TO CALL BUSINESS (Mail or street address for purposes of notification only.)

On Collect on Delivery Shipments, the letters "C.O.D." must appear before consignee's name or as otherwise provided in Reg. 430, Sec. 1.

Destination 2310 MICHAEL FARADAY DR Street SDN DIEGO City
 County CA State 92154 Zip

Route _____ Delivery Address 92154

Delivering Carrier _____ Car or Vehicle Initials and No. _____

Collect on Delivery \$ _____ And Remit to _____

Street _____ City _____ State _____

No. Packages	H.M.	Kind of Package, Description of Articles, Special Marks, and Exceptions	Weight (Subject to Connection)	Class or Rate	Check Column
		OFFICE SUPPLIES	7500P		
		PRINTS CARBONED CONTAINERS	210P		

Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse on the consignee, the consignor shall sign the following statement:
 "The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges."

(Signature of consignor) _____

C. O. D. Charges to be
 Paid by
 Shipper Consignee

If charges are to be prepaid, write or stamp here, "To be Prepaid."

Received \$ _____ to apply in prepayment of the charges on the property described hereon.

Agent or Cashier _____

Per _____ (The signature here acknowledges only the amount prepaid.)

Charges Advanced: \$ _____

1-The film containers used for this shipment conform to the specifications set forth in a box maker's certificate thereon, and all of requirements of Rule 41 of the Uniform Freight Classification and Rule 5 of the National Mt. Freight Classification.
 *Shipper's imprint in lieu of stamp; not a part of bill of lading approved by the Interstate Commerce Commission.

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.
 NOTE - Where the rate is dependent on value, shippers are required to state specifically as writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per

JAMES HANWORTH ^{ON BEHALF OF} Shipper, Per _____

Per _____ Agent

Permanent post-office address of shipper, _____

3

STRAIGHT BILL OF LADING - SHORT FORM

ORIGINAL - NOT NEGOTIABLE

Shipper's No. _____

Carrier's Name: TRV TRANSPORT

Carrier's No. _____

RECEIVED subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading.

At 333 S. TULSA BLVD. CITY OF OKLAHOMA (Date) 12/30/09 FROM ZIONS FIRST NATIONAL BANK

the property described below, in apparent good order except as noted (contents and conditions of contents of packages unknown), marked, consigned, and delivered as shown below, which said consignor (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or route, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Freight Bill of Lading set forth (1) in the Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

(Mail or street address for purposes of notification only.)

Consigned TO CALL RESOURCES
 On Collect on Delivery Shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.
 Destination 310 MICHAEL FARADAY, DR Street SAN DIEGO City
 County CA State 92154 Zip
 Route _____ Delivery Address *
 (*To be filled in only when shipper desires and governing tariffs provide for delivery thereto.)
 Delivering Carrier _____ Car or Vehicle Initials and No. _____
 Collect on Delivery \$ _____ And Remit to _____

Subject to Section 7 of conditions, if the shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
 The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of consignor)
C. O. D. Charges to be Paid by
 Shipper Consignee

If charges are to be prepaid, write or stamp here, "To be Prepaid."

No. Packages	H.M.	Kind of Package, Description of Articles, Special Marks, and Exceptions	Weight (Subject to Correction)	Class or Rate	Check Column
9		OFFICE SUPPLIES PARTITIONS, DESKS, CHAIRS	950 LBS		

Received \$ _____ to apply in prepayment of the charges on the property described hereon.

Agent or Cashier _____

Per _____
 (The signature here acknowledges only the amount prepaid.)
 Charges Advanced: _____

*The fibre containers used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Rule 41 of the Uniform Freight Classification and Rule 5 of the National Motor Freight Classification.
 †Shipper's imprint in lieu of stamp, not a part of bill of lading approved by the Interstate Commerce Commission.

If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.
 NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

JULIUS HANNEGAN FOR ZIONS Shipper, Per _____ Agent
 Permanent post-office address of shipper: _____ Per ROSO CM

1

STRAIGHT BILL OF LADING - SHORT FORM

ORIGINAL - NOT NEGOTIABLE

Shipper's No. _____

Carrier's Name: TRV TRANSPORT

Carrier's No. _____

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of lading,

333 S. TURNBULL CANYON RD
CITY OF INDIANAPOLIS, IN (Date) 12/30/09 FROM ZIONS FIRST NATIONAL BANK

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), packed, consigned and destined as shown below, which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or route, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination, it is mutually agreed, as to such carrier of all or any of said property, over all or any portion of said route to destination and as to each party as any time hereunder in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Freight Bill of Lading set forth (1) in the Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, as forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

(Mail or street address for purposes of notification only.)

Consigned TO CALL RESOURCES

Subject to Section 7 of conditions, if the shipment is to be delivered to the consignee without recourse on the consignee, the consignee shall sign the following statement:
 The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

On Collect on Delivery Shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

Destination 2310 MICHAEL FARADAY DR. Street SAN DIEGO City
 County CA State 92145 Zip

Route _____ Delivery Address _____
 (*To be filled in only when shipper desires and governing tariffs provide for delivery thereof.)

Delivering Carrier _____ Car or Vehicle Initials and No. _____

Collect on Delivery \$ _____ And Remit to _____

(Signature of consignee)
C. O. D. Charges to be Paid by
 Shipper Consignee

Street _____ City _____ State _____

If charges are to be prepaid, write or stamp here, "To be Prepaid."

No. Packages	H.M.	Kind of Package, Description of Articles, Special Marks, and Exceptions	Weight (Subject to Correction)	Class or Rate	Check Column
1CF		UNIVERSAL WASTE CRT DEVICES	350 LBS		
1PZ		UNIVERSAL WASTE CRT DEVICE	150 LBS		
15 Pallets		UNIVERSAL WASTE ELECTRONIC DEVICES	9300 LBS		

Received \$ _____ to apply in prepayment of the charges on the property described herein.

Agent or Cashier _____

Per _____
 (The signature here acknowledges only the amount prepaid.)

Charges Advanced: _____

\$ _____

*The firm containers used for this shipment conform to the specifications set forth in box maker's certificate thereon, and all requirements of Rule 41 of the Uniform Freight Classification and Rule 5 of the National M. Freight Classification.
 †Shipper's imprint in lieu of stamp; not a part of bill of lading approved by the Interstate Commerce Commission.

If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.
 NOTE - Where the rate is dependent on weight, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

JULIUS HANNEGON ON BEHALF OF ZIONS Shipper, Per _____

Permanent post-office address of shipper. _____

Per PERIA CM Agent

1

STRAIGHT BILL OF LADING - SHORT FORM

ORIGINAL - NOT NEGOTIABLE

JIN 8250

Shipper's No. 0108 2000-01

Carrier's Name: J.C. ENVIRONMENTAL COMPANY, INC Carrier's No. _____

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading,
333 S. TURNBULL CANYON RD
 at CITY OF INDUSTRY CA (Date) 1/9/10 FROM ZIONS FIRST NATIONAL BANK
 the property described below is apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned and destined as shown below, which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination if on its own railroad, water line, highway route or route, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as in each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in the Uniform Freight Classification in effect on the date hereof if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

(Mail or street address for purposes of notification only.)

Consigned TO J.C. ENVIRONMENTAL COMPANY, INC
 On Collect on Delivery Shipments, the letters "C.O.D." must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

Destination 6630 CAMINO MANUILA PARRA Street SAN DIEGO City
 County CA State 92154 Zip
 Delivery Address *

Route _____
 (*To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)

Delivering Carrier _____ Car or Vehicle Initials and No. _____

Collect on Delivery \$ _____ And Remit to _____

Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
 The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

 (Signature of consignor)

C. O. D. Charges to be Paid by
 Shipper Consignee

If charges are to be prepaid, write or stamp here, "To be Prepaid."

No. Packages	H.M.	Kind of Package, Description of Articles, Special Marks, and Exceptions	Weight (Subject to Correction)	Class or Rate	Check Column
<u>7CF</u>		<u>UNIVERSAL WASTE, LAMPS</u>	<u>275P</u>		
<u>2DP</u>		<u>UNIVERSAL WASTE, BATTERIES</u>	<u>140P</u>		

Received \$ _____ to apply in prepayment of the charges on the property described hereon.

Agent or Cashier _____

Per _____
 (The signature here acknowledges only the amount prepaid.)
 Charges Advanced.

\$ _____

*The fibre containers used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Rule 41 of the Uniform Freight Classification and Rule 5 of the National M. Freight Classification.
 † Shipper's imprint in lieu of stamp; not a part of bill of lading approved by the Interstate Commerce Commission.

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.
 NOTE — Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

Shipper, Per _____ Agent _____
1/9/10 _____

Permanent post-office address of shipper, _____ Per _____

1

STRAIGHT BILL OF LADING - SHORT FORM

ORIGINAL - NOT NEGOTIABLE

S/N 8250

Shipper's No. 01082010-02

Carrier's Name:

Carrier's No.

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of lading,

533 S. TURNBULL Canyon KP
at City of Industry (Date)

FROM Zions First National Bank

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as shown below, which said company (the word company being understood throughout) has contract as shipping agent or person or corporation in possession of the property under the contract to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Freight Bill of Lading set forth (1) in the Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

(Mail or street address for purposes of notification only.)

Consigned TO J.C. ENKONMATH COMPANY, INC

On Collect on Delivery shipments, the letters "C.O.D." must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

Destination 2504 Transfiguration Ave, Suite C Street NATIONAL CITY City
County CA State 91950 Zip

Route _____ Delivery Address _____

(*To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)

Delivering Carrier _____ Car or Vehicle Initials and No. _____

Collect on Delivery \$ _____ And Remit to _____

Street _____ City _____ State _____

No. Packages	H.M.	Kind of Package, Description of Articles, Special Marks, and Exceptions	Weight (Subject to Correction)	Class or Rate	Check Column
5PZ		APPLIANCES (USABLE) REFRIGERATORS AND FREEZERS	300P		

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.
NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

ON BEHALF OF Zions Shipper, Per _____

Permanent post-office address of shipper, _____

JG

1/8/70

1

Per _____

Agent

Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse on the consignee, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of consignor.)

C. O. D. Charges to be

Paid by
 Shipper Consignee

If charges are to be prepaid, write or stamp here, "To be Prepaid."

Received \$ _____ to apply in prepayment of the charges on the property described hereon.

Agent or Cashier

Per _____
(The signature here acknowledges only the amount prepaid.)

Charges Advanced:

*The five containers used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Rule 41 of the Uniform Freight Classification and Rule 5 of the National Motor Freight Classification.

Shipper's imprint in lieu of stamp; not a part of bill of lading approved by the Interstate Commerce Commission.

STRAIGHT BILL OF LADING - SHORT FORM

ORIGINAL - NOT NEGOTIABLE

J/N 8250

Shipper's No. 01092010-09

Carrier's Name: J.C. Environmental Company, Inc

Carrier's No. _____

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading.

333. STEVENSON (Box 20)
 at CITY OF INDIANAPOLIS, IN (Date) 11/8/10 FROM Zions First National Bank

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, secured, and destined as shown below, which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Freight Bill of Lading set forth (1) in the Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

(Mail or street address for purposes of notification only.)

Consigned TO J.C. Environmental Company Inc

On Collect on Delivery Shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

Destination 6630 Camino Mariposa Street City San Diego
 County _____ State CA Zip 92154

Route _____ Delivery Address _____

(*To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)

Delivering Carrier _____ Car or Vehicle Initials and No. _____

Collect on Delivery \$ _____ And Remit to _____

Street _____ City _____ State _____

No. Packages	H.M.L.	Kind of Package, Description of Articles, Special Marks, and Exceptions	*Weight (Subject to Correction)	Class or Rate	Check Column
2 DI-		UNIVERSAL WASTE, BATTERIES (ALKALINE)	140 P		
		UN 300 BATTERIES, DRY CONTAINING POTASSIUM HYDROXIDE, SOLID, B, PG III	ACTUAL WEIGHT 218 POUNDS		

Subject to Section 7 of conditions, if the shipment is to be delivered to the consignee without recourse on the consignee, the consignee shall sign the following statement:

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of consignee)

C. O. D. Charges to be Paid by
 Shipper Consignee

If charges are to be prepaid, write or stamp here, "To be Prepaid."

Received \$ _____ to apply in prepayment of the charges on the property described hereon.

Agent or Cashier

Per: _____
 (The signature here acknowledges only the amount prepaid.)

Charges Advanced: _____

*The fibre containers used for this shipment conform to the specifications set forth in box maker's certificate thereon, and all requirements of Rule 41 of the Uniform Freight Classification and Rule 5 of the National Freight Classification.

*Shipper's imprint in lieu of stamp; not a part of bill of lading approved by the Interstate Commerce Commission.

*If the shipment crosses between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.

NOTE - When the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

JULIUS HANSSON Shipper, Per _____ Agent

Permanent post-office address of shipper: _____ 11/8/10 Per _____

1

982R-600-2

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. Manifest Document No. 88273 2. Page 1 of 1

3. Generator's Name and Mailing Address ARC International 333 Turnbull Canyon Road City of Industry, CA. 91746

4. Generator's Phone () 760/489-5600

5. Transporter 1 Company Name United Pumping Service 6. US EPA ID Number CAD072953771

A. Transporter's Phone 626/961-9326

7. Transporter 2 Company Name 8. US EPA ID Number

B. Transporter's Phone

9. Designated Facility Name and Site Address Filter Recycling Services 180 W. Monte Ave. Rialto, CA. 92316 10. US EPA ID Number CAD982444481

C. Facility's Phone 2012 909/421-1690

11. Waste Shipping Name and Description

12. Containers No. Type 13. Total Quantity 14. Unit WU/Vol

a. (debris) Non Hazardous Waste Solid

1. CM 4.0 Y

b.

.

c.

.

d.

.

D. Additional Description for Materials Listed Above

E. Handling Codes for Wastes Listed Above

11a. Debris #10012619

15. Special Handling Instructions and Additional Information Wear Appropriate Proper Protective Equipment Emergency Contact #626/961-9326 WO#67853-1 138865

16. GENERATOR'S CERTIFICATION: I Certify the materials described above on this manifest are not subject to Federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Type Name Robert Dipce for Zions Bank

Signature [Signature] Month Day Year 10/21/10

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Type Name EDUARDO CABRERAS

Signature [Signature] Month Day Year 10/21/10

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Type Name

Signature Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of Receipt of waste materials covered by this manifest as noted in Item 19.

Printed/Type Name Steven Masters

Signature [Signature] Month Day Year 12/22/10

ORIGINAL RETURN TO GENERATOR

Generator Transporter Facility

THIS MEMORANDUM

is an acknowledgement that a Bill of Lading has been issued and is not the Original Bill of Lading, nor a copy or duplicate, covering the property named herein, and is intended solely for filling or record.

Shipper's No. _____

Carrier's Name: TRV Transfer

Carrier's No. _____

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of lading.

333 TUPACAN CANYON RD
 at CITY OF TUPACAN, ARIZONA (Date) 3/11/10 FROM Zions First National Bank

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as shown below, which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes or within the territory of its highway operations otherwise to deliver to another carrier on the route to said destination, it is mutually agreed, as to each carrier of all or any of said property, over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Freight Bill of Lading set forth (1) in the Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

Consigned TO CALL RESOURCES INC
On Collect on Delivery Shipments, the letters "COD" must appear before consignee's name or as otherwise provided in item 430, Sec. 1.

Destination 2310 MICHAEL FARADAY, D Street City SAN DIEGO
 County CVA State 92154 Zip

Route _____ Delivery Address Star

Delivering Carrier _____ Car or Vehicle Initials and No. _____

Collect on Delivery \$ _____ And Remit to _____

Street _____ City _____ State _____

No. Packages	H.M.	Kind of Package, Description of Articles, Special Marks, and Exceptions	Weight (Subject to Correction)	Class or Rate	Check Column
1140a		SCRAP-MACHINERY, VENTILATORS, CARBON DUMPS	6135		

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.
 NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

Zions First National Bank Shipper, Per Carlos Crespo Agent
 Permanent post-office address of shipper: JULIUS HANSMAN 3/11/10 Per
ON BEHALF OF ZIONS

Subject to Section 7 of conditions. If this shipment is to be delivered to the consignee without recourse on the consignee, the consignor shall sign the following statement:
 The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of consignor) _____

C. O. D. Charges to be Paid by
 Shipper Consignee

If charges are to be prepaid, write or stamp here, "To be Prepaid."

Received \$ _____ to apply in prepayment of the charges on the property described hereon.

Agent or Cashier _____

Per _____
 (The signature here acknowledges only the amount prepaid.)

Charges Advanced: _____

*The fibre containers used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Rule 41 of the Uniform Freight Classification and Rule 5 of the National Motor Freight Classification.
 *Shipper's imprint in lieu of stamp; not a part of bill of lading approved by the Interstate Commerce Commission.

3

UNIFORM HAZARDOUS WASTE MANIFEST
 1. Generator ID Number: **CAC002651229**
 2. Page 1 of 1
 3. Emergency Response Phone No: **866-333-9222**
 4. Manifest Tracking Number: **007014440 JJK**

5. Generator's Name and Mailing Address: **Kion's First National Bank, 333 Turnbull Canyon Rd, City of Industry CA 91745**
 Generator's Site Address (if different than mailing address): **333 Turnbull Canyon Rd, City of Industry CA 91745**

6. Transporter 1 Company Name: **Advanced Chemical Transport**
 U.S. EPA ID Number: **CA000070540**

7. Transporter 2 Company Name: _____
 U.S. EPA ID Number: _____

8. Designated Facility Name and Site Address: **Ecology Nevada, Inc., P.O. Box 578, Hwy 95, 11 miles S, Beatty, NV 89003**
 U.S. EPA ID Number: **NVT330010000**
 Facility's Phone: **800-239-3943**

9a. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt/Vol.	13. Waste Codes		
	No.	Type			1	2	3
1. HAZARDOUS WASTE, SOLID, N.O.S., (Lead, mercury), 9, PGIII	1	CM	30.60	Y	D008	D009	352
2. _____	_____	_____	_____	_____	_____	_____	_____
3. _____	_____	_____	_____	_____	_____	_____	_____

14. Special Handling Instructions and Additional Information: **DW6864-1**

15. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. I export shipment and I am the Primary Exporter. I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.

Generator's Owner's Printed/Typed Name: **S. J. L. TRANSEVA**
 Signature: _____ Date: **04/12/00**

16. International Shipments: _____
 Transporter signature (for exports only): _____
 Export from U.S. _____ Date leaving U.S. _____

17. Transporter Acknowledgment of Receipt of Materials
 Transporter 1 Printed/Typed Name: _____
 Transporter 2 Printed/Typed Name: _____
 Signature: _____ Date: _____

18. Discrepancy Indication Space: _____
 18a. Discrepancy Indication Space: _____
 18b. Alternate Facility (or Generator): _____
 U.S. EPA ID Number: _____

19. Hazardous Waste Report Management Method Codes (A, B, C, D, E, F, G, H, I, J, K, L, M, N, O, P, Q, R, S, T, U, V, W, X, Y, Z)
 1. _____ 2. _____ 3. _____ 4. _____

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a.
 Printed/Typed Name: _____ Signature: _____ Date: _____

American Ecology Corporation Land Disposal Restriction Form

GENERATOR: Zions First National Bank EPA I.D. NUMBER: CAC002651229
 WASTE STREAM or PROFILE NUMBER: 07067954-0 MANIFEST DOC. NO. 007014 JJK LINE NO. 1
 WASTE IS A: WASTEWATER NON-WASTEWATER DEBRIS
 NOTIFICATION FREQUENCY: ONE TIME REQUIRED WITH EACH SHIPMENT
 EPA WASTE CODES (from 40 CFR 268.40): LJ00 LJ01 _____
 UNDERLYING HAZARDOUS CONSTITUENTS (from 40 CFR 268.48): LEAD, MERCURY

Fix
(DEBRIS)
Fix

- A. Restricted Waste Meets Treatment Standards (40 CFR 268.7(a) (3))
 The restricted waste identified above meets the treatment standards in 40 CFR 268.40 or Alternative LDR treatment standards for contaminated soil 40 CFR 268.49 and can be landfilled disposed without further treatment. I have attached all supporting analytical data, where available.
 I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.
- B. Restricted Waste Treated To Treatment Standards (40 CFR 268.7(b) (1) & 268.7 (b) (2))
 The treatment residue, or extract of such residue, or the restricted waste identified above has been tested to assure that the treatment residue or extract meet all applicable treatment standards in 40 CFR 268.40 and/or performance standards in 40 CFR 268.45. I have attached all supporting analytical data, where available.
 I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.
- C. Restricted Waste With Technology Based Treatment Standards (40 CFR 268.7(b) (4))
 I certify under penalty of law that I personally have examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that based on my inquiry of those individuals immediately responsible for obtaining this information. I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards specified in 40 CFR 268.40, without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.
- D. Restricted Waste Decharacterized But Requires Treatment For UHC (40 CFR 268.8)
 I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remove the hazardous characteristic. This decharacterized waste contains Underlying Hazardous Constituents (UHC) that require further treatment to meet the universal treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.
- E. Restricted Waste Subject To Treatment (40 CFR 268.7(a) (2))
 The restricted waste identified above must be treated to the applicable treatment standards in 40 CFR 268.40, or treated to comply with applicable prohibitions set forth in Part 268.32 or RCRA Section 8004(d). I have attached all supporting analytical data, where available.
- F. Hazardous Debris Subject To Treatment (40 CFR 268.45)
 This hazardous debris identified above must be treated to the alternative treatment standards in 40 CFR 268.45.
- G. Restricted Waste Subject To A Variance or Extension (40 CFR 268.7(a) (4))
 This restricted waste identified above is subject to a case-by case exemption under 40 CFR 268.5, an exemption under 40 CFR 268.6 or a nationwide capacity variance under Subpart C of 40 CFR 268, and is not prohibited from land disposal. LDR prohibitions become effective on _____ (date) for this restricted waste. The corresponding treatment standard(s) are promulgated in 40 CFR 268.40. I have attached all supporting analytical data, where available.
- H. Restricted Waste Managed In A "Lab Pack" (40 CFR 268.7(a) (9))
 I certify under penalty of law that I personally have examined and am familiar with the waste and that the lab pack contains only waste that have been excluded under appendix IV to 40 CFR Part 268 and that this lab pack may be sent to a combustion facility in compliance with the alternative treatment standards for lab packs at 40 CFR 268.42(c). I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

I certify and warrant that the information that appears on this form, and appended documents, is true and correct. I have correctly indicated how my waste is to be managed in accordance with 40 CFR 268. My certification is based on personal examination of the information submitted, or is based on my inquiries of those individuals responsible for obtaining the information.

Authorized Signature: [Signature] Date: 4/12/10

UHC list from 40 CFR Part 268.48 available upon request

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number CAC002651229	2. Page 1 of 1	3. Emergency Response Phone 866-333-9222	4. Manifest Tracking Number 007014440 JJK			
5. Generator's Name and Mailing Address Zions First National Bank 333 Turnbull Canyon Rd City of Industry CA 91745				Generator's Site Address (if different than mailing address) 333 Turnbull Canyon Rd City of Industry CA 91745				
Generator's Phone: 801 844-7392				U.S. EPA ID Number CAR006070540				
6. Transporter 1 Company Name Advanced Chemical Transport				U.S. EPA ID Number				
7. Transporter 2 Company Name				U.S. EPA ID Number				
8. Designated Facility Name and Site Address EN Ecology Nevada, Inc. P.O. Box 578, Hwy 95, 11 miles S. Beatty Beatty, NV 89003				U.S. EPA ID Number NVT330010000				
Facility's Phone: 800-239-3923								
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
		No.	Type					
X	1. HAZU11, Hazardous waste, solid, n.o.s., (lead, mercury), 9, PGIII	02L	CM	30L	Y	D008	D009	352
	2.							
	3.							
	4.							
14. Special Handling Instructions and Additional Information 17 U70167954-0; ERS # 171; ZIU- Project Number: SD-28326								
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.								
Generator's/Offeror's Printed/Typed Name JOHN W. ...				Signature <i>[Signature]</i>		Month 04	Day 12	Year 78
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____								
17. Transporter Acknowledgment of Receipt of Materials								
Transporter 1 Printed/Typed Name ...				Signature <i>[Signature]</i>		Month ...	Day ...	Year ...
Transporter 2 Printed/Typed Name				Signature		Month	Day	Year
18. Discrepancy								
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection								
Manifest Reference Number:						U.S. EPA ID Number		
18b. Alternate Facility (or Generator)						U.S. EPA ID Number		
Facility's Phone:								
18c. Signature of Alternate Facility (or Generator)						Month	Day	Year
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)								
1.		2.		3.		4.		
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a								
Printed/Typed Name				Signature		Month	Day	Year

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number: CA0072151229	2. Page 1 of 1	3. Emergency Response Phone 408-333-7222	4. Manifest Tracking Number 003194368 FLE					
5. Generator's Name and Mailing Address <i>Waste Management Services, Inc. 2145 S. ...</i>				Generator's Site Address (if different than mailing address) <i>200 ...</i>						
Generator's Phone: <i>408-333-7222</i>										
6. Transporter 1 Company Name <i>Waste Management Services</i>				U.S. EPA ID Number CA0072953771						
7. Transporter 2 Company Name				U.S. EPA ID Number						
8. Designated Facility Name and Site Address <i>Waste Management Services, Inc. 2145 S. ...</i>				U.S. EPA ID Number						
Facility's Phone: <i>408-333-7222</i>										
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
				No.	Type					
	X	1. <i>HAZARDOUS WASTE, SOLID, D.O.S. ...</i>		1	CM	30	Y	2000	0007	332
14. Special Handling Instructions and Additional Information <i>1301 7024-0 200 171 210 ...</i>										
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.										
Generator's/Offeror's Printed/Typed Name <i>Waste Management Services</i>				Signature <i>[Signature]</i>		Month Day Year <i>06 12 10</i>				
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____										
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials									
	Transporter 1 Printed/Typed Name <i>[Name]</i>				Signature <i>[Signature]</i>		Month Day Year <i>12 10 10</i>			
Transporter 2 Printed/Typed Name				Signature		Month Day Year				
DESIGNATED FACILITY	18. Discrepancy									
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection									
	Manifest Reference Number: _____									
18b. Alternate Facility (or Generator)				U.S. EPA ID Number						
Facility's Phone:										
18c. Signature of Alternate Facility (or Generator)				Signature		Month Day Year				
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)										
1. _____			2. _____			3. _____			4. _____	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a										
Printed/Typed Name				Signature		Month Day Year				

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number CA0002051229	2. Page 1 of 1	3. Emergency Response Phone No. 814-333-7222	4. Manifest Tracking Number 00314368 FILE
5. Generator's Name and Mailing Address 2015 FIRST NATIONAL BANK 335 N. LINDEN RD. LAYTON, UT 84041		Generator's Site Address (if different than mailing address) 533 7000 S. UNIVERSITY CITY OF INDUSTRY, UT 84145			
6. Transporter 1 Company Name United Dumping Services		U.S. EPA ID Number CA0072953771			
7. Transporter 2 Company Name		U.S. EPA ID Number			
8. Designated Facility Name and Site Address U.S. COLONY, NEVADA LLC IND. BOX 578 HWY 95 BEATTY, NV. 89003		U.S. EPA ID Number ND-23903943			
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity (mc)	12. Unit Wt./Vol.
X	1. NABOTT (HAZARDOUS WASTE SOLID) 0.5 (CORRO. LIQUID) 9	1. CM	30	Y	2000 0009 352
	2.				
	3.				
	4.				
14. Special Handling Instructions and Additional Information 0701079010 L.R. 6370 210 BOX L.R. 6370					
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I declare that the waste minimization statement identified in 40 CFR 262.27(a) (1) I am a large quantity generator, or (b) (1) I am a small quantity generator is true.					
Generator's/Offeror's Printed/Typed Name WILLIAM L. HANSEN		Signature WILLIAM L. HANSEN Month 10 Day 12 Year 10			
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.		Port of entry/exit PORTLAND, ME			
17. Transporter Acknowledgment of Receipt of Materials		Date leaving U.S. 10/12/10			
18. Discrepancy Indication Space		Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection <input type="checkbox"/>			
18a. Discrepancy Indication Space		Manifest Reference Number			
18b. Alternate Facility (or Generator) Name and Address		U.S. EPA ID Number			
18c. Signature of Alternate Facility (or Generator)		Month Day Year			
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)					
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest, except as noted in item 18a					
Printed/Typed Name		Signature			

American Ecology Corporation Land Disposal Restriction Form

GENERATOR: Zions First National Bank EPA ID NUMBER: CAC002651229

WASTE STREAM or PROFILE NUMBER: 07067954-0 MANIFEST DOC. NO. 067111 ~~JK~~ LINE NO. 1

WASTE IS A: WASTEWATER NON-WASTEWATER DEBRIS 009194368 FILE ~~JK~~

NOTIFICATION FREQUENCY: WASTEWATER ONE TIME REQUIRED WITH EACH SHIPMENT

EPA WASTE CODES (from 40 CFR 268.40): U005 U007

UNDERLYING HAZARDOUS CONSTITUENTS (from 40 CFR 268.48): LEAD, MERCURY

A. Restricted Waste Meets Treatment Standards (40 CFR 268.7(a) (3))

The restricted waste identified above meets the treatment standards in 40 CFR 268.40 or Alternative LDR treatment standards for contaminated soil 40 CFR 268.49 and can be landfilled without further treatment. I have attached all supporting analytical data, where available.

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

B. Restricted Waste Treated To Treatment Standards (40 CFR 268.7(b) (1) & 268.7 (b) (2))

The treatment residue, or extract of such residue, or the restricted waste identified above has been treated to assure that the treatment residue or extract meet all applicable treatment standards in 40 CFR 268.40 and/or performance standards in 40 CFR 268.45. I have attached all supporting analytical data, where available.

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

C. Restricted Waste With Technology Based Treatment Standards (40 CFR 268.7(b) (4))

I certify under penalty of law that I personally have examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that based on my inquiry of those individuals immediately responsible for obtaining this information. I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards specified in 40 CFR 268.40, without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

D. Restricted Waste Decharacterized But Requires Treatment For UHC (40 CFR 268.9)

I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remove the hazardous characteristic. This decharacterized waste contains Underlying Hazardous Constituents (UHC) that require further treatment to meet the universal treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

E. Restricted Waste Subject To Treatment (40 CFR 268.7(a) (2))

The restricted waste identified above must be treated to the applicable treatment standards in 40 CFR 268.40, or treated to comply with applicable prohibitions set forth in Part 268.32 or RCRA Section 3004(d). I have attached all supporting analytical data, where available.

F. Hazardous Debris Subject To Treatment (40 CFR 268.45)

This hazardous debris identified above must be treated to the alternative treatment standards in 40 CFR 268.45.

G. Restricted Waste Subject To A Variance or Extension (40 CFR 268.7(a) (4))

This restricted waste identified above is subject to a case-by case exemption under 40 CFR 268.5, an exemption under 40 CFR 268.6 or a nationwide capacity variance under Subpart C of 40 CFR 268, and is not prohibited from land disposal. LDR prohibitions become effective on _____ (date) for this restricted waste. The corresponding treatment standard(s) are promulgated in 40 CFR 268.40. I have attached all supporting analytical data, where available.

H. Restricted Waste Managed In A "Lab Pack" (40 CFR 268.7(a) (5))

I certify under penalty of law that I personally have examined and am familiar with the waste and that the lab pack contains only waste that have been excluded under appendix IV to 40 CFR Part 268 and that this lab pack may be sent to a combustion facility in compliance with the alternative treatment standards for lab packs at 40 CFR 268.42(c). I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

I certify and warrant that the information that appears on this form, and appended documents, is true and correct. I have correctly indicated how my waste is to be managed in accordance with 40 CFR 268. My certification is based on personal examination of the information provided, or is based on my inquiries of those individuals responsible for obtaining the information.

Authorized Signature: [Signature] Title: PROJECT MGR Date: 4/2/10

UHC list from 40 CFR Part 268.48 available upon request

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number CA:002651229	2. Page 1 of 1	3. Emergency Response Phone 866-333-9222	4. Manifest Tracking Number 007014442 JJK			
5. Generator's Name and Mailing Address Zions First National Bank 333 Turnbull Canyon Rd City of Industry CA 91745 Generator's Phone: 801 844-7392				Generator's Site Address (if different than mailing address) 333 Turnbull Canyon Rd City of Industry CA 91745				
6. Transporter 1 Company Name Advanced Chemical Transport					U.S. EPA ID Number 12AR00070540			
7. Transporter 2 Company Name					U.S. EPA ID Number			
8. Designated Facility Name and Site Address US Ecology Nevada, Inc. P.O. Box 578, Hwy 95, 11 miles S. Beatty Beatty, NV 89003 Facility's Phone: 800-239-3943					U.S. EPA ID Number NV7330616000			
GENERATOR	9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	X	1. UN2206, Isocyanate, solutions, toxic, n.o.s., (polymeric isocyanate), 6.1, PGII		1 PF		20	G	331
	X	2. UN2735, Waste Amines, liquid, corrosive, n.o.s., (hexamethylenetriamine), 8, PGII		1 DM		15	G	331
		3.						
		4.						
14. Special Handling Instructions and Additional Information 1) 070131570-3215; ERG #: 155; ZIU- 2) 070137710-727; ERG #: 153; ZIU- Project Number: SD-28325 DISTRIBUTION 3/11/02								
15. GENERATOR/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.								
Generator's/Officer's Printed/Typed Name Julie Hanningan				Signature [Signature]		Month Day Year 10/19/02		
TRANSPORTER INT'L	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.			Port of entry/exit: Date leaving U.S.:				
	17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name				Signature		Month Day Year		
Transporter 2 Printed/Typed Name				Signature		Month Day Year		
DESIGNATED FACILITY	18. Discrepancy							
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
	18b. Alternate Facility (or Generator)					Manifest Reference Number:		U.S. EPA ID Number
	Facility's Phone:					U.S. EPA ID Number		
18c. Signature of Alternate Facility (or Generator)					Month Day Year			
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)								
1.		2.		3.		4.		
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a								
Printed/Typed Name				Signature		Month Day Year		

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number CAC002651229	2. Page 1 of 1	3. Emergency Response Phone No. 866-333-9222	4. Manifest Tracking Number 007014442 JJK
5. Generator's Name and Mailing Address Lions First National Bank 333 Turnbull Canyon Rd City of Industry CA 91745			Generator's Site Address (if different than mailing address) 333 Turnbull Canyon Rd City of Industry CA 91745		
6. Transporter 1 Company Name Advanced Chemical Transport			U.S. EPA ID Number CA000070540		
7. Transporter 2 Company Name			U.S. EPA ID Number		
8. Designated Facility Name and Site Address US Ecology Nevada, Inc P.O. Box 578 Hwy 95 Beatty, NV 89003			U.S. EPA ID Number NV2300010000		
9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number and Packing Group (if any))			10. Containers	11. Total Quantity	12. Unit Wt./Vol.
1. UN2206, isocyanate, solutions, toxic, n.o.s., (polymeric isocyanate), 6.1 PGII			No. Type		
2. UN2735 Waste Amines, liquid, corrosive, n.o.s. (hexamethylenetriamine), 8 PGII			1 DF	20	G
3.			1 DF	15	G
14. Special Handling Instructions and Additional Information (1) 070131570-3215, ERG # 155, ZIU-2 (2) 070137710-727, ERG # 153, ZIU-2 Project Number: 3028345 1/55/11/100 2/1/55/11/1002					
15. GENERATOR/SOFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled, discarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.					
Generator's Name and Printed Name WILLIAM HANAGHAN					
Signature <i>[Signature]</i>					
Month Day Year 01/19/10					
16. International Shipments (For import to U.S. or Export from U.S.)					
17. Transporter Acknowledgment of Receipt of Materials					
Transporter 1 Printed/Typed Name Advanced Chemical Transport					
Signature <i>[Signature]</i>					
Month Day Year 01/19/10					
Transporter 2 Printed/Typed Name					
Signature					
Month Day Year					
18. Discrepancy Indication Space					
18a. Discrepancy Indication Space (Quantity) Type					
18b. Alternate Facility (or Generator)					
18c. Signature of Alternate Facility (or Generator)					
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)					
20. Designated Facility Owner, or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a					
Printed/Typed Name					
Signature					
Month Day Year					

American Ecology Corporation Land Disposal Restriction Form

GENERATOR: ZIONS First National Bank EPA I.D. NUMBER: CAC002651229
 WASTE STREAM or PROFILE NUMBER: 070131 520-3215 MANIFEST DOC. NO. 0070144255 LINE NO. 1
 WASTE IS A: WASTEWATER NON-WASTEWATER DEBRIS
 NOTIFICATION FREQUENCY: ONE TIME REQUIRED WITH EACH SHIPMENT
 EPA WASTE CODES (from 40 CFR 268.40): _____

UNDERLYING HAZARDOUS CONSTITUENTS (from 40 CFR 268.48): _____

- A. **Restricted Waste Meets Treatment Standards (40 CFR 268.7(a) (3))**
 The restricted waste identified above meets the treatment standards in 40 CFR 268.40 or Alternative LDR treatment standards for contaminated soil 40CFR268.49 and can be landfill disposed without further treatment. I have attached all supporting analytical data, where available.
 I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.
- B. **Restricted Waste Treated To Treatment Standards (40 CFR 268.7(b) (1) & 268.7 (b) (2))**
 The treatment residue, or extract of such residue, or the restricted waste identified above has been tested to assure that the treatment residues or extract meet all applicable treatment standards in 40 CFR 268.40 and/or performance standards in 40 CFR 268.45. I have attached all supporting analytical data, where available.
 I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.
- C. **Restricted Waste With Technology Based Treatment Standards (40 CFR 268.7(b) (4))**
 I certify under penalty of law that I personally have examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that based on my inquiry of those individuals immediately responsible for obtaining this information. I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards specified in 40 CFR 268.40, without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.
- D. **Restricted Waste Decharacterized But Requires Treatment For UHC (40 CFR 268.9)**
 I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remove the hazardous characteristic. This decharacterized waste contains Underlying Hazardous Constituents (UHC) that require further treatment to meet the universal treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.
- E. **Restricted Waste Subject To Treatment (40 CFR 268.7(a) (2))**
 The restricted waste identified above must be treated to the applicable treatment standards in 40 CFR 268.40, or treated to comply with applicable prohibitions set forth in Part 268.32 or RCRA Section 3004(d). I have attached all supporting analytical data, where available.
- F. **Hazardous Debris Subject To Treatment (40 CFR 268.45)**
 This hazardous debris identified above must be treated to the alternative treatment standards in 40 CFR 268.45.
- G. **Restricted Waste Subject To A Variance or Extension (40 CFR 268.7(a) (4))**
 This restricted waste identified above is subject to a case by case exemption under 40 CFR 268.5, an exemption under 40 CFR 268.6 or a nationwide capacity variance under Subpart C of 40 CFR 268, and is not prohibited from land disposal. LDR prohibitions become effective on _____ (date) for this restricted waste. The corresponding treatment standard(s) are promulgated in 40 CFR 268.40. I have attached all supporting analytical data, where available.
- H. **Restricted Waste Managed In A "Lab Pack" (40 CFR 268.7(a) (9))**
 I certify under penalty of law that I personally have examined and am familiar with the waste and that the lab pack contains only waste that have been excluded under appendix IV to 40 CFR Part 268 and that this lab pack may be sent to a combustion facility in compliance with the alternative treatment standards for lab packs at 40 CFR 268.42(c). I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

I certify and warrant that the information that appears on this form, and appended documents, is true and correct. I have correctly indicated how my waste is to be managed in accordance with 40 CFR 268. My certification is based on personal examination of the information submitted, or is based on my inquiries of those individuals responsible for obtaining the information.

Authorized Signature: [Signature] Title: PROJECT MGR Date: 4/19/80
UHC list from 40 CFR Part 268.48 available upon request

American Ecology Corporation Land Disposal Restriction Form

GENERATOR: ZIONS First National Bank EPA I.D. NUMBER: CAC002651229
 WASTE STREAM or PROFILE NUMBER: 070137710-727 MANIFEST DOC. NO. 00701442JL LINE NO. 2
 WASTE IS A: WASTEWATER NON-WASTEWATER DEBRIS
 NOTIFICATION FREQUENCY: ONE TIME REQUIRED WITH EACH SHIPMENT
 EPA WASTE CODES (from 40 CFR 268.40): _____
 UNDERLYING HAZARDOUS CONSTITUENTS (from 40 CFR 268.48): _____

A. Restricted Waste Meets Treatment Standards (40 CFR 268.7(a) (3))

The restricted waste identified above meets the treatment standards in 40 CFR 268.40 or Alternative LDR treatment standards for contaminated soil 40CFR268.49 and can be landfill disposed without further treatment. I have attached all supporting analytical data, where available.

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

B. Restricted Waste Treated To Treatment Standards (40 CFR 268.7(b) (1) & 268.7 (b) (2))

The treatment residue, or extract of such residue, or the restricted waste identified above has been tested to assure that the treatment residues or extract meet all applicable treatment standards in 40 CFR 268.40 and/or performance standards in 40 CFR 268.45. I have attached all supporting analytical data, where available.

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

C. Restricted Waste With Technology Based Treatment Standards (40 CFR 268.7(b) (4))

I certify under penalty of law that I personally have examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that based on my inquiry of those individuals immediately responsible for obtaining this information. I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards specified in 40 CFR 268.40, without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

D. Restricted Waste Decharacterized But Requires Treatment For UHC (40 CFR 268.9)

I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remove the hazardous characteristic. This decharacterized waste contains Underlying Hazardous Constituents (UHC) that require further treatment to meet the universal treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

E. Restricted Waste Subject To Treatment (40 CFR 268.7(a) (2))

The restricted waste identified above must be treated to the applicable treatment standards in 40 CFR 268.40, or treated to comply with applicable prohibitions set forth in Part 268.32 or RCRA Section 3004(d). I have attached all supporting analytical data, where available.

F. Hazardous Debris Subject To Treatment (40 CFR 268.45)

This hazardous debris identified above must be treated to the alternative treatment standards in 40 CFR 268.45.

G. Restricted Waste Subject To A Variance or Extension (40 CFR 268.7(a) (4))

This restricted waste identified above is subject to a case by case exemption under 40 CFR 268.5, an exemption under 40 CFR 268.6 or a nationwide capacity variance under Subpart C of 40 CFR 268, and is not prohibited from land disposal. LDR prohibitions become effective on _____ (date) for this restricted waste. The corresponding treatment standard(s) are promulgated in 40 CFR 268.40. I have attached all supporting analytical data, where available.

H. Restricted Waste Managed In A "Lab Pack" (40 CFR 268.7(a) (9))

I certify under penalty of law that I personally have examined and am familiar with the waste and that the lab pack contains only waste that have been excluded under appendix IV to 40 CFR Part 268 and that this lab pack may be sent to a combustion facility in compliance with the alternative treatment standards for lab packs at 40 CFR 268.42(c). I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

I certify and warrant that the information that appears on this form, and appended documents, is true and correct. I have correctly indicated how my waste is to be managed in accordance with 40 CFR 268. My certification is based on personal examination of the information submitted, or is based on my inquiries of those individuals responsible for obtaining the information.

Authorized Signature _____ Title _____ Date _____

UHC list from 40 CFR Part 268.48 available upon request

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number CAC002651229	2. Page 1 of 1	3. Emergency Response Phone 866-333-9222	4. Manifest Tracking Number 0070 4479 JJK		
5. Generator's Name and Mailing Address Zions First National Bank 333 Turnbull Canyon Rd City of Industry CA 91745				Generator's Site Address (if different than mailing address) 333 Turnbull Canyon Rd City of Industry CA 91745			
Generator's Phone: 801 844-7392				U.S. EPA ID Number: CA0800040640-2			
6. Transporter 1 Company Name Advanced Chemical Transport				U.S. EPA ID Number			
7. Transporter 2 Company Name				U.S. EPA ID Number			
8. Designated Facility Name and Site Address Filter Recycling Services, Inc. 180 W. Monte Ave. Kilaheo, CA 92515				U.S. EPA ID Number CAD98244481			
Facility's Phone: 800-698-4377							
Ba. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
		No.	Type				
	1. NON RCRA Hazardous Waste Solid (Decon Debris)	001	CM	12,000	P	352	
	2.						
	3.						
	4.						
14. Special Handling Instructions and Additional Information 1) 10041201; E1E- Project Number: SD-28396 ## LB-131							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offoror's Printed/Typed Name JULIE HANCOCK				Signature <i>[Signature]</i>		Month Day Year 10/17/10	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____							
17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name [Name]				Signature <i>[Signature]</i>		Month Day Year 10/17/10	
Transporter 2 Printed/Typed Name				Signature		Month Day Year	
18. Discrepancy							
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
Manifest Reference Number: _____							
18b. Alternate Facility (or Generator)				U.S. EPA ID Number			
Facility's Phone:							
18c. Signature of Alternate Facility (or Generator)						Month Day Year	
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1.		2.		3.		4.	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a							
Printed/Typed Name				Signature		Month Day Year	

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number CAC002651229	2. Page 1 of 1	3. Emergency Response Phone No. (if different than generator's phone no.) 866-333-9222	4. Manifest Tracking Number 007014479 JJK	
5. Generator's Name and Mailing Address Zions First National Bank 333 Turnbull Canyon Rd City of Industry CA 91745 Generator's Phone: 801-844-7392			Generator's Site Address (if different than mailing address) 333 Turnbull Canyon Rd City of Industry CA 91745			
6. Transporter 1 Company Name Vantage Transport Services Inc Addressed Clean-out Transports			U.S. EPA ID Number CA0000670846-0			
7. Transporter 2 Company Name			U.S. EPA ID Number			
8. Designated Facility Name and Site Address Filter Recycling Services Inc 180 W. Monte Ave Rialto CA 92316 Facility's Phone: 800-698-4377			U.S. EPA ID Number CAD982444481			
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers	11. Total Quantity	12. Unit W/Vol	13. Waste Codes
		1. Non RCRA Hazardous Waste Solid (Decon Debris)	No. Type	001 CAX 12,000	352	
		2.				
		3.				
14. Special Handling Instructions and Additional Information 1. 100% DECON Project Number: SD 28396 LR-031						
15. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (1) if I am a large quantity generator or (b) if I am a small quantity generator is true.						
Generator's Printed/Typed Name JAMES H. HANES			Signature [Signature] Month Day Year 04/19/10			
16. International Shipments			Export to: <input type="checkbox"/> Import to U.S.: <input type="checkbox"/> Export from U.S.: <input type="checkbox"/> Port of origin: <input type="checkbox"/> Date leaving U.S.: <input type="checkbox"/>			
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials			Signature [Signature] Month Day Year 04/19/10		
	Transporter 1 Printed/Typed Name VANTAGE TRANSPORT SERVICES INC			Signature [Signature] Month Day Year 04/19/10		
	Transporter 2 Printed/Typed Name			Signature [Signature] Month Day Year		
DESIGNATED FACILITY	18. Discrepancy: <input type="checkbox"/> 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection <input type="checkbox"/>					
	18b. Alternate Facility (or Generator) Name <input type="checkbox"/> U.S. EPA ID Number <input type="checkbox"/>					
	18c. Signature of Alternate Facility (or Generator) <input type="checkbox"/> Month Day Year <input type="checkbox"/>					
	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)					
	20. Designated Facility Owner or Operator Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a					

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number CA0423651229	2. Page 1 of	3. Emergency Response Phone 686422	4. Manifest Tracking Number 004427311 JJK		
5. Generator's Name and Mailing Address 2100 N. MAIN ST. BANK 255 N. MAIN ST. SUITE D. LAYTON, UT 84041		Generator's Site Address (if different than mailing address) 333 TURNBULL (ANYWHERE) CITY OF INDEPENDENCE, PA 15126					
Generator's Phone: (801)841-9292		6. Transporter 1 Company Name UNIVERSITY OF UTAH			U.S. EPA ID Number		
7. Transporter 2 Company Name					U.S. EPA ID Number		
8. Designated Facility Name and Site Address CENTRAL INDEPENDENCE LANDFILL 3451 E. COLVILLE 12TH ST WELLINGTON UT 84086		Facility's Phone: 725-285-3777			U.S. EPA ID Number 4133		
GENERATOR	9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers No. Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
		1. NON HAZARDOUS WASTE LIQUID (RINSE WATER)		201 TT	5300	G	NONE 134 135
		2.					
		3.					
		4.					
14. Special Handling Instructions and Additional Information 4133-10-41372							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offendor's Printed/Typed Name JULIA HANNEGAN				Signature <i>[Signature]</i>		Month Day Year 04 19 10	
TRANSPORTER INTL	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____						
	17. Transporter Acknowledgment of Receipt of Materials						
TRANSPORTER	Transporter 1 Printed/Typed Name K. CLARK BARBOSE			Signature <i>[Signature]</i>		Month Day Year 04 19 10	
	Transporter 2 Printed/Typed Name			Signature		Month Day Year	
DESIGNATED FACILITY	18. Discrepancy						
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
	Manifest Reference Number:						
18b. Alternate Facility (or Generator)					U.S. EPA ID Number		
Facility's Phone:							
18c. Signature of Alternate Facility (or Generator)						Month Day Year	
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1.		2.		3.		4.	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name				Signature		Month Day Year	

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number CAC00265/229	2. Page 1 of 1	3. Emergency Response Phone 628/861-0328	4. Manifest Tracking Number 004427311 JJK			
5. Generator's Name and Mailing Address 2100S FIRST NATIONAL BANK 3135 N. FAIRFIELD RD. SUITE D. LAYTON, UT 84041			Generator's Site Address (if different than mailing address) 333 TURNBULL CANYON RD CITY OF INDUSTRY, CA 91745					
Generator's Phone: (801)844-7392			U.S. EPA ID Number CAD072063771					
6. Transporter 1 Company Name UNITED PUMPING SERVICE, INC.			U.S. EPA ID Number					
7. Transporter 2 Company Name			U.S. EPA ID Number					
8. Designated Facility Name and Site Address COYOTE MOUNTAIN LAND FILL 34503 E COUNTY RD 5 WELLER, AZ 85356			U.S. EPA ID Number 4133					
Facility's Phone: 928-785-3777								
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt/Vol	13. Waste Codes	
		1. NON-FLAMMABLE LIQUID (RINSE WATER)	No.	Type	5300	G	None	134-135
14. Special Handling Instructions and Additional Information 9B1 4133-10-1352						WHAT APPROPRIATE PROTECTIVE EQUIPMENT 686482 EMERGENCY CONTACT CHEM TRIC 800-474-9306		
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.								
Generator's/Offeror's Printed/Typed Name JULIE HANNESS			Signature <i>[Signature]</i>			Month Day Year 10/19/70		
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.		Date leaving U.S. 10/19/70					
	17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name Kenneth Barbora		Signature <i>[Signature]</i>		Month Day Year 10/19/70			
DESIGNATED FACILITY	18. Discrepancy							
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
	18b. Alternate Facility (or Generator) Facility's Phone: 928-785-3777			U.S. EPA ID Number 4133				
	18c. Signature of Alternate Facility (or Generator) Month Day Year 10/19/70							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)								
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Printed/Typed Name _____ Signature _____ Month Day Year _____								

NON-HAZARDOUS WASTE MANIFEST

Please print or type (Form designed for use on elite (12 pitch) typewriter)

NON-HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. <i>CA0000000000</i>		Manifest Document No. <i>SD-20391</i>	2. Page 1 of
3. Generator's Name and Mailing Address <i>Sioux First National Bank 220 Turnbull Canyon Rd Culver City, CA 90230</i>					
4. Generator's Phone () <i>310 548 2000</i>					
5. Transporter 1 Company Name <i>Advanced Chemical Transport</i>		6. US EPA ID Number <i>CA0000000000</i>		A. State Transporter's ID	
7. Transporter 2 Company Name		8. US EPA ID Number		B. Transporter 1 Phone <i>310 548 2000</i>	
9. Designated Facility Name and Site Address <i>Filter Recycling Services, Inc. 100 W. Monte Ave. Brea, CA 92626</i>		10. US EPA ID Number <i>CA000244401</i>		C. State Transporter's ID	
11. WASTE DESCRIPTION		12. Containers		13. Total Quantity	
		No. Type		Unit Wt./Vol.	
a. <i>Non Hazardous Waste, Solid (food flavoring)</i>		<i>13 UN 001 GWT</i>		<i>7.00 LBS</i>	
b.					
c.					
d.					
G. Additional Descriptions for Materials Listed Above <i>1) EIF-</i>				H. Handling Codes for Wastes Listed Above	
15. Special Handling Instructions and Additional Information <i>11 10010910; EIF- Project Number: SD-20391</i>					
16. GENERATOR'S CERTIFICATION: I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transport. The materials described on this manifest are not subject to federal hazardous waste regulations.					
Printed/Typed Name <i>JULIA HARRISON</i>		Signature <i>[Signature]</i>		Date <i>04/19/05</i>	
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name <i>[Name]</i>		Signature <i>[Signature]</i>	
18. Transporter 2 Acknowledgement of Receipt of Materials		Printed/Typed Name		Signature	
19. Discrepancy Indication Space					
20. Facility Owner or Operator; Certification of receipt of the waste materials covered by this manifest, except as noted in item 19.					
Printed/Typed Name		Signature		Date	

NON-HAZARDOUS WASTE

GENERATOR

TRANSPORTER

FACILITY

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number CAC002651229	2. Page 1 of 1	3. Emergency Response Phone 866-333-9222	4. Manifest Tracking Number 007014441 JJK						
5. Generator's Name and Mailing Address Zions First National Bank 333 Turnbull Canyon Rd City of Industry CA 91745 Generator's Phone: 627 444-7402				Generator's Site Address (if different than mailing address) 333 Turnbull Canyon Rd City of Industry CA 91745							
6. Transporter 1 Company Name Advanced Chemical Transport				U.S. EPA ID Number CAE000070540							
7. Transporter 2 Company Name SLT Express Wav. Inc.				U.S. EPA ID Number AE000008515							
8. Designated Facility Name and Site Address Kineco Chemical Industries, Inc. 1007 Vulcan Road Haskell Benton, AR 72015 Facility's Phone: 501-778-6325				U.S. EPA ID Number AR0001051820							
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes					
		No.	Type			D001	331				
		1	CF					260	4		
		2									
		3									
4											
14. Special Handling Instructions and Additional Information 1) 1003-03138; ERG #: 128; EIR- 6/2/00 Project Number: SD-28325											
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.											
Generator's/Offeror's Printed/Typed Name Zions First National Bank				Signature [Signature]		Month Day Year 04 19 10					
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/ext: _____ Date leaving U.S.: _____											
17. Transporter Acknowledgment of Receipt of Materials											
Transporter 1 Printed/Typed Name [Name]				Signature [Signature]		Month Day Year 4 19 10					
Transporter 2 Printed/Typed Name				Signature		Month Day Year					
18. Discrepancy											
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection											
18b. Alternate Facility (or Generator) Manifest Reference Number: _____ U.S. EPA ID Number: _____											
18c. Signature of Alternate Facility (or Generator) Month Day Year											
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)											
1. _____		2. _____		3. _____		4. _____					
20. Designated Facility Owner or Operator. Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a											
Printed/Typed Name				Signature		Month Day Year					

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved: OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number CAC002651228	2. Page 1 of 1	3. Emergency Response Phone 866-333-9222	4. Manifest Tracking Number 007014441 JJK
5. Generator's Name and Mailing Address Zions First National Bank 333 Turnbull Canyon Rd City of Industry CA 91745			Generator's Site Address (if different than mailing address) 333 Turnbull Canyon Rd City of Industry CA 91745		
6. Transporter 1 Company Name Advanced Chemical Transport			U.S. EPA ID Number CAK000070540		
7. Transporter 2 Company Name SLT Express Way, Inc.			U.S. EPA ID Number AZR000508515		
8. Designated Facility Name and Site Address Rineco Chemical Industries, Inc. 1007 Vulcan Road Benton, AR 72015			U.S. EPA ID Number AR000165290		
9a. HM			9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers
			11. Total Quantity		12. Unit Wt./Vol.
			13. Waste Codes		
1. UN1263, Waste Paint, 3, PGIII			1. CF		260
2.					
3.					
4.					
14. Special Handling Instructions and Additional Information 1) 1003-03138, ERG #: 128, EIR-CFA/001 Project Number: SD-28325 REF MANIFEST #007044508JJK					
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.					
Generator's/Offeror's Printed/Typed Name James H. ...			Signature [Signature]		Month Day Year 10/19/10
16. International Shipments <input type="checkbox"/> Import to U.S. <input checked="" type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____					
17. Transporter Acknowledgment of Receipt of Materials					
Transporter 1 Printed/Typed Name Steven Jordan			Signature [Signature]		Month Day Year 10/19/10
Transporter 2 Printed/Typed Name			Signature		Month Day Year
18. Discrepancy					
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection					
18b. Alternate Facility (or Generator) U.S. EPA ID Number					
18c. Signature of Alternate Facility (or Generator) Month Day Year					
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)					
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a Printed/Typed Name _____ Signature _____ Month Day Year _____					

RINECO LAND DISPOSAL RESTRICTION NOTIFICATION FORM

Generator	Zions First National Bank	EPAID#	CAC002651229
EPA Codes	D001	State Man. Doc.#	Man. Doc.# 007014441JK
		Profile	1003-03138
		Line Item	1

EPA Waste Codes	Waste Description & Treatment/ Regulatory Subcategory (Non-Wastewater)	Concentration in mg/l or Technology Code
-----------------	---	---

- | | | | |
|-------------------------------------|------|--|--|
| <input type="checkbox"/> | D001 | Ignitable characteristic wastes, except for 261.21(a) (1) High TOC subcategory that are managed in Non-CWA/nonCWA equivalent/non class I SDWA systems. | DEACT and meet 268.48 standards or RORGS; or CMBST |
| <input checked="" type="checkbox"/> | D001 | High TOC Ignitable characteristic liquids subcategory based on 40 CER 261.21(a)(1)-greater than or equal to 10% TOC. | RORGS; or CMBST |
| <input type="checkbox"/> | D002 | Corrosive characteristic wastes that are managed in non-CWA nonCWA equivalent, or class/SDWA systems. | DEACT & meet 268.48 standards |

D004-D011	Non Wastewater Heavy Metals Expressed in Concentrations of mg/l (TCLP) (Non-Wastewater)
-----------	---

- | | | | | | |
|--------------------------|------|--------------|--------------------------|------|--------------------------------------|
| <input type="checkbox"/> | D004 | Arsenic 5.0 | <input type="checkbox"/> | D008 | Lead 5.0 |
| <input type="checkbox"/> | D005 | Barium 100 | <input type="checkbox"/> | D009 | Mercury 0.20 low mercury subcategory |
| <input type="checkbox"/> | D006 | Cadmium 1.0 | <input type="checkbox"/> | D010 | Selenium 5.7 |
| <input type="checkbox"/> | D007 | Chromium 5.0 | <input type="checkbox"/> | D011 | Silver 5.0 |

D012-D043	Concentrations Expressed in mg/kg, and Must Meet 268.48 Standards. (Non-Wastewater)
-----------	---

- | | | | | | | | | |
|--------------------------|------|--------------------------|--------------------------|------|-----------------------------|--------------------------|------|---------------------------|
| <input type="checkbox"/> | D012 | Endrin 0.13 | <input type="checkbox"/> | D024 | m-cresol 5.6 | <input type="checkbox"/> | D036 | Nitrobenzene 14 |
| <input type="checkbox"/> | D013 | Lindane 0.066 | <input type="checkbox"/> | D025 | p-cresol 5.6 | <input type="checkbox"/> | D037 | Pentachlorophenol 7.4 |
| <input type="checkbox"/> | D014 | Methoxychlor 0.18 | <input type="checkbox"/> | D026 | Cresol Mixed Isomers | <input type="checkbox"/> | D038 | Pyridine 16 |
| <input type="checkbox"/> | D015 | Toxaphene 2.6 | <input type="checkbox"/> | D027 | p-dichlorobenzene 6.0 | <input type="checkbox"/> | D039 | Tetrachloroethylene 6.0 |
| <input type="checkbox"/> | D016 | 2,4 DIO | <input type="checkbox"/> | D028 | 1,2-dichloroethane 6.0 | <input type="checkbox"/> | D040 | Trichloroethylene 6.0 |
| <input type="checkbox"/> | D017 | 2,4,5-TP Silvex 7.9 | <input type="checkbox"/> | D029 | 1,1-dichloroethylene 6.0 | <input type="checkbox"/> | D041 | 2,4,5-Trichlorophenol 7.4 |
| <input type="checkbox"/> | D018 | Benzene 10 | <input type="checkbox"/> | D030 | 2,4-dinitrotoluene 140 | <input type="checkbox"/> | D042 | 2,4,6-Trichlorophenol 7.4 |
| <input type="checkbox"/> | D019 | Carbon Tetrachloride 6.0 | <input type="checkbox"/> | D031 | Heptachlor & epoxides 0.066 | <input type="checkbox"/> | D043 | Vinyl Chloride 6.0 |
| <input type="checkbox"/> | D020 | Chlordane 0.26 | <input type="checkbox"/> | D032 | Hexachlorobenzene 10 | | | |
| <input type="checkbox"/> | D021 | Chlorobenzene 6.0 | <input type="checkbox"/> | D033 | Hexachlorobutadiene 5.6 | | | |
| <input type="checkbox"/> | D022 | Chloroform 6.0 | <input type="checkbox"/> | D034 | Flexachloroethane 30 | | | |
| <input type="checkbox"/> | D023 | o-cresol 5.6 | <input type="checkbox"/> | D035 | Methyl Ethyl Ketone 36 | | | |

F001-F005 Spent Solvents; (Non-Wastewater) concentrations expressed in mg/kg	F003-F005 Non-Wastewater spent solvents expressed in mg/l (TCLP)
--	--

- | | | | | | |
|--------------------------|---------------------------|--------------------------|---------------------------|--------------------------|----------------------|
| <input type="checkbox"/> | Acetone 160 | <input type="checkbox"/> | Isobutyl Alcohol 170 | <input type="checkbox"/> | Carbon disulfide 4.8 |
| <input type="checkbox"/> | Benzene 10 | <input type="checkbox"/> | Methylene Chloride 30 | <input type="checkbox"/> | Cyclohexanone 0.75 |
| <input type="checkbox"/> | N-butyl alcohol 2.6 | <input type="checkbox"/> | Methyl Ethyl Ketone 36 | <input type="checkbox"/> | Methanol 0.75 |
| <input type="checkbox"/> | carbon tetrachloride 6.0 | <input type="checkbox"/> | Methyl Isobutyl Ketone 33 | | |
| <input type="checkbox"/> | chlorobenzene 6.0 | <input type="checkbox"/> | Nitrobenzene 14 | | |
| <input type="checkbox"/> | o-cresol 5.6 | <input type="checkbox"/> | Pyridine 16 | | |
| <input type="checkbox"/> | m-cresol 5.6 | <input type="checkbox"/> | Tertachloroethylene 6.0 | | |
| <input type="checkbox"/> | p-cresol 5.6 | <input type="checkbox"/> | Toluene 10 | | |
| <input type="checkbox"/> | Cresol mixed isomers 11.2 | <input type="checkbox"/> | 111-Trichloroethane 6.0 | | |
| <input type="checkbox"/> | 0-Dichlorobenzene 6.0 | <input type="checkbox"/> | 112-Trichloroethane 6.0 | | |
| <input type="checkbox"/> | Ethyl Acetate 33 | <input type="checkbox"/> | 112-Trichloro- | | |
| <input type="checkbox"/> | Ethyl Benzene 10 | <input type="checkbox"/> | 122-trifluoroethane 30 | | |
| <input type="checkbox"/> | Ethyl Ether 160 | <input type="checkbox"/> | Trichloroethylene 6.0 | | |
| | | <input type="checkbox"/> | Trichloromono- | | |
| | | <input type="checkbox"/> | fluoromethane 30 | | |
| | | <input type="checkbox"/> | Xylene (mixed isomers) 30 | | |

07/11/96 kc

Signature


 JULIUS HANNEGAN
 ON BEHALF OF
 ZIONS BANK

Date

7/19/10

RINECO LAND DISPOSAL RESTRICTION NOTIFICATION FORM

EPA Waste Codes (Non-Wastewater)

Technology Code

U189, U249, U133, U135, U098, U023, U096, U113, U086, U099, U103, U109, U160

CHOXD; CHRED; or CMBST

U246

CHOXD; WETOX; or CMBST

U115

CHOXD; or INCIN

K044, K045, K047

DEACT

K112, K123, K124, K125, K126, K025, K026, U001, U006, U007, U010, U014, U015, U017, U020, U021, U026, U033, U034, U035, U038, 0041, U042, U046, U049, U059, U062, 0073, U074, U091, U092, U093, U095, U097, U110, U114, U116, U119, U132, U143, U148, U149, U150, U153, U156, U163, U167, U168, U171, U173, U176, U178, U184, U191, U193, U194, U200, U202, U206, U218, U219, U222, U236, U237, U238, U244 F005 (2-Nitropropane, 2-ethoxyethanol) U328, U353, F024

CMBST

K027, K039, K113, K114, K116, U008, U016, U053, U055, U056, U057, U058, U064, U085, U087, U089, U090, U094, U113, U122, U123, U124, U125, U126, U147, U154, U166, U182, U186, U197, U201, U213, U221, U223, U248, U359, K107, K108, K109, K110, U011, 0016, U053, U055, U056, U003, U009, U108, U164, U177, U234

K106

REMERC

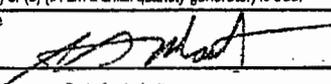
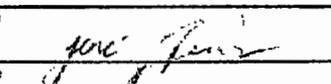
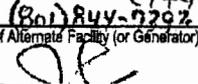
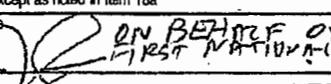
U134

ADGAS fb

Neutr; Or Neutr

Signature _____

Date _____

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number CAD982444481	2. Page 1 of 1	3. Emergency Response Phone 866-333-9222	4. Manifest Tracking Number 007044508 JJK		
5. Generator's Name and Mailing Address Filter Recycling Services, Inc. 180 W. Monte Ave Rialto, CA 92316 Generator's Phone: 909-421-2012				Generator's Site Address (if different than mailing address)			
6. Transporter 1 Company Name Advanced Chemical Transport				U.S. EPA ID Number CAR000070540			
7. Transporter 2 Company Name				U.S. EPA ID Number			
8. Designated Facility Name and Site Address ARC International 333 Turnbull Canyon Road, City of Industry, CA 91746 Facility's Phone: 760-489-5600				U.S. EPA ID Number CAR000180257			
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
		No.	Type				
X	1. Waste flammable liquid, nos (petroleum distillates) 3, UN1993, PG II (D001).	1	DM	8	G	D001	331
	2.						
	3.						
	4.						
14. Special Handling Instructions and Additional Information Wear appropriate personal protective equipment ERG #128 Rejected from non-hazardous manifest # 88273, returned to generator REF: 007044508 JJK							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offeror's Printed/Typed Name Steven Masters, offeror				Signature 		Month Day Year 3 4 10	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Transporter signature (for exports only): Date leaving U.S.:							
17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name JOSE PEREZ				Signature 		Month Day Year 03 04 10	
Transporter 2 Printed/Typed Name				Signature		Month Day Year	
18. Discrepancy							
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number: 007044508 JJK							
18b. Alternate Facility (or Generator) ZIONS FIRST NATIONAL BANK 333 TURNBULL CANYON RD. CITY OF INDUSTRY CA 91745 Facility's Phone: (909) 444-9292 U.S. EPA ID Number							
18c. Signature of Alternate Facility (or Generator) ON BEHALF OF ZION FIRST NATIONAL BANK 						Month Day Year 03 15 10	
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1.		2.		3.		4.	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a							
Printed/Typed Name JULIUS HANNEGAN				Signature 		Month Day Year 03 15 10	

STRAIGHT BILL OF LADING - SHORT FORM

ORIGINAL - NOT NEGOTIABLE

Shipper's No. _____

Carrier's Name: CALL RESOURCES INC

Carrier's No. _____

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of lading,

333 TURNBULL CANYON RD
CITY OF INDUSTRY CA (Date) 4/19/10 FROM ZIONS FIRST NATIONAL BANK

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned and destined as shown below, which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad water line, highway route or route, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Freight Bill of Lading set forth (1) in the Uniform Freight Classification in effect on the date hereof if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

Consigned TO CALL RESOURCES INC (Mall or street address for purposes of notification only.)

On Collect on Delivery Shipments, the letters "C.O.D." must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

Destination 2310 MICHAEL FARROW RD Street SAN DIEGO City

County _____ Delivery Address _____ State CA Zip 92154

Route _____ Delivery Address _____ (To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)

Delivering Carrier _____ Car or Vehicle Initials and No. _____

Collect on Delivery \$ _____ And Remit to _____

Street _____ City _____ State _____

No. Packages	H.M.	Kind of Package, Description of Articles, Special Marks, and Exceptions	Weight (Subject to Correction)	Class or Rate	Check Column
1		40 FT SHIPPING CONTAINER (EMPTY)	10,000 P		

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight. NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____

Shipper, Per _____

per BARON BETTLE OF ZIONS BANK
JULIUS HANDEGAN Agent

Permanent post-office address of shipper, _____

Per _____

Subject to Section 7 of conditions, if the shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of consignor.)
C. O. D. Charges to be Paid by
 Shipper Consignee

If charges are to be prepaid, write or stamp here, "To be Prepaid."

Received \$ _____ to apply in prepayment of the charges on the property described hereon.

Agent or Cashier _____

Per _____ (The signature here acknowledges only the amount prepaid.)

Charges Advanced: \$ _____

*The fibre containers used for this shipment conform to the specifications set forth in the box maker's certifications thereon, and all other requirements of Rule 41 of the Uniform Freight Classification and Rule 5 of the National Motor Freight Classification.

! Shipper's intent in lieu of stamp; not a part of bill of lading approved by the Interstate Commerce Commission.

STRAIGHT BILL OF LADING - SHORT FORM

ORIGINAL - NOT NEGOTIABLE

Shipper's No. _____

Carrier's Name: Carl Reynolds Inc

Carrier's No. _____

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of lading,

at 333 TURNBULL CANYON RD CITY OF INDUSTRY CA (Date) 4/19/10 FROM ZIONS FIRST NATIONAL BANK

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned and secured as shown below, which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in the Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

(Mall or street address for purpose of notification only.)

Consigned TO Carl Reynolds Inc

On Collect on Delivery Shipments, the letters "C.O.D." must appear before consignee's name or as otherwise provided in Item 430, Sec. 4.

Destination 2310 MILWAUKEE PARKWAY DR Street SAN DIEGO City
CA State 92154 Zip

County _____ Delivery Address _____

Route _____ (*To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)

Delivering Carrier _____ Car or Vehicle Initials and No. _____

Collect on Delivery \$ _____ And Remit to _____

Subject to Section 7 of conditions, if the shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
 The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

 (Signature of consignor.)

C. O. D. Charges to be Paid by
 Shipper Consignee

No. Packages	H. M.	Street	City	State	*Weight (Subject to Correction)	Class or Rate	Check Column
1		40 FT SHIPPING CONTAINER (EMPTY)			10,000 LBS		

If charges are to be prepaid, write or stamp here, "To be Prepaid."

Received \$ _____ to apply in prepayment of the charges on the property described hereon.

 Agent or Cashier

Per _____
 (The signature here acknowledges only the amount prepaid.)

Charges Advanced: _____

\$ _____

*The fibre containers used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Rule 41 of the Uniform Freight Classification and Rule 5 of the National Motor Freight Classification.
 †Shipper's Impit is lieu of stamp; not a part of bill of lading approved by the Interstate Commerce Commission.

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.
 NOTE—Where the value is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____

[Signature] Shipper, Per _____

Per [Signature] ON BEHALF OF ZIONS BANK Agent

Permanent post-office address of shipper: _____

1

STRAIGHT BILL OF LADING - SHORT FORM

ORIGINAL - NOT NEGOTIABLE

Shipper's No. _____

Carrier's Name: CALL RESOURCES, INC

Carrier's No. _____

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading,

at 333 TRENBOW CANYON RD (Date) 4/19/10 FROM ZIONS FIRST NATIONAL BANK
CITY OF LANSING MI

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as shown below, which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or route, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property, over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in the Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

Consigned TO CALL RESOURCES, INC
(Mail or street address for purposes of notification only.)

Destination 2310 MICHAEL FARADAY DR Street SAN DIEGO City
 County _____ State CA Zip 92154

Route _____ Delivery Address CA
(*To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)

Delivering Carrier _____ Car or Vehicle Initials and No. _____

Collect on Delivery \$ _____ And Remit to _____

Street _____ City _____ State _____

No. Packages	H.M.	Kind of Package, Description of Articles, Special Marks, and Exceptions	Weight (Subject to Correction)	Class or Rate	Check Column
1492		EQUIPMENT WITH LEAD BASED PAINT	11,000 P		

Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse on the consignee, the consignor shall sign the following statement:
 The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of consignor) _____

C. O. D. Charges to be Paid by
 Shipper Consignee

If charges are to be prepaid, write or stamp here, "To be Prepaid."

Received \$ _____ to apply in prepayment of the charges on the property described hereon.

Agent or Cashier _____

Per _____
(The signature here acknowledges only the amount prepaid.)
 Charges Advanced _____

*The fibre containers used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Rule 41 of the Uniform Freight Classification and Rule 5 of the National Motor Freight Classification.
 †Shipper's imprint in lieu of stamp; not a part of bill of lading approved by the Interstate Commerce Commission.

*If the shipment is between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.
 NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
 The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____

[Signature] Shipper, Per _____
 Permanent post-office address of shipper, _____

ON BEHALF OF ZIONS BANK
JULIUS HANNEGAN Agent
 Per _____

STRAIGHT BILL OF LADING - SHORT FORM

ORIGINAL - NOT NEGOTIABLE

Shipper's No. _____

Carrier's Name: Car Resources, Inc

Carrier's No. _____

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of lading,

at 3337 Vermont Canyon Rd (Date) 4/20/10 FROM Zions First National Bank
CITY OF INDUSTRY, CA

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as shown below, which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in the Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

(Mail or street address for purposes of notification only.)

Consigned TO Car Resources, Inc

On Collect on Delivery Shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

Destination 2310 MICHAEL FARADAY DR Street San Diego City
 County CA State 92154 Zip

Route _____ Delivery Address _____

(*To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)

Delivering Carrier _____ Car or Vehicle Initials and No. _____

Collect on Delivery \$ _____ And Remit to _____

Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse to the consignor, the consignor shall sign the following statement:
 The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of consignor)

C. O. D. Charges to be
 Paid by
 Shipper Consignee

If charges are to be prepaid, write or stamp here, "To be Prepaid."

No. Packages	H.M.	Kind of Package, Description of Articles, Special Marks, and Exceptions	Weight (Subject to Correction)	Class or Rate	Check Column
1		20 FT SHIPPING CONTAINER	7000 lb		

Received \$ _____ to apply in prepayment of the charges on the property described hereon.

Agent or Cashier _____

Per _____
 (The signature here acknowledges only the amount prepaid.)

Charges Advanced: \$ _____

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.
 NOTE - Where the release dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

Shipper, Per _____

Permanent post-office address of shipper, _____

per ON BEHALF OF ZIONS BANK
JULIE HANSEN Agent

Per JH

1

STRAIGHT BILL OF LADING - SHORT FORM

ORIGINAL - NOT NEGOTIABLE

Shipper's No. _____

Carrier's Name: Carl Resnick Inc.

Carrier's No. _____

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of lading,

at 333 TURNBULL (HAYON RD) 37th DE TRUSTEE, CA (Date) 4/20/10 FROM ZIONS FIRST NATIONAL BANK

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned and destined as shown below, which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or route, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property, over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Freight Bill of Lading set forth (1) in the Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his agent.

(Mail or street address for purposes of notification only)

Consigned to Carl Resnick Inc.

On Collect on Delivery Shipments, the letters "C.O.D." must appear before consignee's name or as otherwise provided in Item 430, Sec 1

Destination 2310 MICHAEL FARROW DR Street SAN DIEGO City

County CA State 92134 Zip

Route _____ Delivery Address ★

(★To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)

Delivering Carrier _____ Car or Vehicle Initials and No. _____

Collect on Delivery \$ _____ And Remit to _____

Street _____ City _____ State _____

No. Packages	H.M.	Kind of Package, Description of Articles, Special Marks, and Exceptions	*Weight (Subject to Correction)	Class or Rate	Check Column
1		70 FT SHIPPING CONTAINER (EMPTY)	10000 LBS		

*If the shipment moves between ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.
NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____

[Signature] Shipper, Per

ON BEHALF OF ZIONS BANK
JULIUS HANNISSEN Agent

Permanent post-office address of shipper.

Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse on the consignee, the consignee shall sign the following statement:

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of consignee)

C. O. D. Charges to be Paid by
 Shipper Consignee

If charges are to be prepaid, write or stamp here, "To be Prepaid."

Received \$ _____ to apply in prepayment of the charges on the property described hereon.

Agent or Cashier

Per _____
(The signature here acknowledges only the amount prepaid.)

Charges Advanced:

\$ _____

*The fibre containers used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Rule 41 of the Uniform Motor Freight Classification and Rule 5 of the National Motor Freight Classification.

† Shipper's imprint in lieu of stamp; not a part of bill of lading approved by the Interstate Commerce Commission.

STRAIGHT BILL OF LADING - SHORT FORM

ORIGINAL - NOT NEGOTIABLE

Shipper's No. _____

Carrier's Name: Cal Resources Inc

Carrier's No. _____

RECEIVED, subject to the classifications and tariffs in effect on the date of this Bill of lading,

at 333 TURNBULL CANYON RD (Date) 4/25/10 FROM ZIONS FIRST NATIONAL BANK
CITY OF INDIANAPOLIS, IN

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as shown below which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in the Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for transit by the carrier.

(Mail or street address for purposes of notification only.)

Consigned to Cal Resources Inc

On Collect on Delivery Shipments, the letters "COD" must appear before Consignee's name or as otherwise provided in Item 430, Sec. 1.

Destination 2310 MILWAUKEE FREEDOM PK Street SAN DIEGO City
 County CA State 92154 Zip

Route _____ Delivery Address Star (To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)

Delivering Carrier _____ Car or Vehicle Initials and No. _____

Collect on Delivery \$ _____ And Remit to _____

Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse on the consignee, the consignee shall sign the following statement:
 The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of consignee.)

C. O. D. Charges to be

Paid by
 Shipper Consignee

If charges are to be prepaid, write or stamp here, "To be Prepaid."

No. Packages	H.M.	Kind of Package, Description of Articles, Special Marks, and Exceptions	Weight (Subject to Correction)	Class or Rate	Check Column
1		40 FT SHIPPING CONTAINER (EMPTY)	10000		

Received \$ _____ to apply in prepayment of the charges on the property described hereon.

Agent or Cashier

Per _____
 (The signature here acknowledges only the amount prepaid.)
 Charges Advanced:

\$ _____
 *The fibre container used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Rule 41 of the Uniform Freight Classification and Rule 5 of the National Motor Freight Classification.
 †Shipper's imprint in lieu of stamp; not a part of bill of lading approved by the Interstate Commerce Commission.

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.
 NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding

0.00 per _____
 Shipper, Per _____ ON BEHALF OF ZIONS BANK
TULLUS HANNESEN Agent
 Permanent post-office address of shipper: _____ Per _____

1

STRAIGHT BILL OF LADING - SHORT FORM

ORIGINAL - NOT NEGOTIABLE

Shipper's No. _____

Carrier's Name: Carl Resources, Inc. Carrier's No. _____

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading.

333 TURBINE CHIMNEY CO
 at CITICORP INDUSTRIES (Date) 4/22/79 FROM ZIONS FIRST NATIONAL BANK

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as shown below, which said consignor (the word consignor being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination. If on its own railroad, water line, highway route or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any portion of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Freight Bill of Lading set forth (1) in the Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

Consigned TO Carl Resources, Inc. (Mail or street address for purposes of notification only.)

On Collect on Delivery Shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

Destination 2310 Michael Faraday Dr Street SAN DIEGO City

County _____ State CA Zip 92154

Route _____ Delivery Address ★

(★ To be filled in only when shipper desires and governing tariffs provide for delivery thereto.)

Delivering Carrier _____ Car or Vehicle Initials and No. _____

Collect on Delivery \$ _____ And Remit to _____

Street _____ City _____ State _____

No. Packages	H.M.	Kind of Package, Description of Articles, Special Marks, and Exceptions	*Weight (Subject to Correction)	Class or Rate	Check Column
1		40FT SHIPPING CONTAINER (EMPTY)	10000P		

Subject to Section 7, of conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of consignor) _____

C. O. D. Charges to be Paid by
 Shipper Consignee

If charges are to be prepaid, write or stamp here, "To be Prepaid."

Received \$ _____ in payment of the charges on the property described hereon.

Agent or Cashier _____

Per _____
(The signature here acknowledges only the amount prepaid.)

Charges Advanced: _____

\$ _____

* The fibre containers used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Rule 41 of the Uniform Freight Classification and Rule 5 of the National Motor Freight Classification.

† Shipper's imprint in lieu of stamp; not a part of bill of lading approved by the Interstate Commerce Commission.

* If the shipment moves between two ports by a carrier by water, the law requires that the Bill of Lading shall state whether it is carrier's or shipper's weight.

NOTE - When the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

Obzyl Shipper, Per _____

ON BEHALF OF ZIONS BANK
JULIUS HANSEN Agent
 Per _____

Permanent post-office address of shipper: _____

1

STRAIGHT BILL OF LADING - SHORT FORM

ORIGINAL - NOT NEGOTIABLE

Shipper's No. _____

Carrier's Name: CAR RESOURCES INC

Carrier's No. _____

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of lading,
333 TURNBULL (ANTON RD)
 at CITY OF INDIANAPOLIS, IN (Date) 4/22/70 FROM ZIONS FIRST NATIONAL BANK
 the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned and demurrage as shown below which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any routes of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in the Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

Consigned TO CAR RESOURCES INC (Mail or street address for purposes of notification only.)
 On Collect on Delivery Shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 436, Sec. 1.
 Destination 2310 MILWAUKEE FARADAY PK Street San Diego City
CA State 92154 Zip
 County _____ Delivery Address _____
 Route _____ (To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)
 Delivering Carrier _____ Car or Vehicle Initials and No. _____
 Collect on Delivery \$ _____ And Remit to _____

Subject to Section 7 of conditions, if the shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
 The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

 (Signature of consignor.)

C. O. D. Charges to be Paid by
 Shipper Consignee
 If charges are to be prepaid, write or stamp here, "To be Prepaid."

No Packages	H.M.	Kind of Package, Description of Articles, Special Marks, and Exceptions	Weight (Subject to Correction)	Class or Rate	Check Column
4PC		EQUIPMENT (WITH LEAD BATTERED PAINT) (BAILER, SHREVE, 2 DUST COLLECTORS) (2 TRIPS)	54,000#		

Received \$ _____ to apply in prepayment of the charges on the property described hereon.

Agent or Cashier
 Per _____
 (The signature here acknowledges only the amount prepaid.)
 Charges Advanced
 \$ _____

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.
 NOTE - When the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per
[Signature] Shipper, Per ON BEHALF OF ZIONS BANK
JULIUS HANNESEN Agent
 Permanent post-office address of shipper, _____ Per [Signature]

1

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number CAC002651220	2. Page 1 of 1	3. Emergency Response Phone 866-933-0229	4. Manifest Tracking Number 007014604 JJK					
5. Generator's Name and Mailing Address Zions First National Bank 3130 N Fairfield Rd Suite D Canyon UT 84041 Generator's Phone: 801-734-7202				Generator's Site Address (if different than mailing address) 333 Turnbull Canyon Rd City of Industry CA 91745						
6. Transporter 1 Company Name Advanced Chemical Transport				U.S. EPA ID Number CA1000209875						
7. Transporter 2 Company Name				U.S. EPA ID Number CA8000070540						
8. Designated Facility Name and Site Address US Ecology Nevada, Inc. P.O. Box 578, Hwy 95, 11 miles S. Beatty Beatty, NV 89003 Facility's Phone: 702-734-3342				U.S. EPA ID Number NVE330010000						
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
	X	1. NA3071, Hazardous waste, solid, n.o.s., (lead, mercury), 9, PGLIII		No.	Type	200	P	D008	D009	352
		2.								
		3.								
		4.								
14. Special Handling Instructions and Additional Information 1) 070157954-0; ERG #: 1717 EIU- Project Number: SD-28591										
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.										
Generator's/Offeor's Printed/Typed Name T. H. ...								Month	Day	Year
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Part of entry/exit: Date leaving U.S.:										
TRANSPORTER INT'L	17. Transporter Acknowledgment of Receipt of Materials									
	Transporter 1 Printed/Typed Name					Signature			Month	Day
Transporter 2 Printed/Typed Name					Signature			Month	Day	Year
DESIGNATED FACILITY	18. Discrepancy									
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection									
18b. Alternate Facility (or Generator)								Manifest Reference Number:		U.S. EPA ID Number
Facility's Phone:								Month	Day	Year
18c. Signature of Alternate Facility (or Generator)								Month	Day	Year
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)										
1.		2.		3.		4.				
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a										
Printed/Typed Name					Signature			Month	Day	Year

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number CAC002651229	2. Page 1 of 1	3. Emergency Response Phone 866-333-9222	4. Manifest Tracking Number 007014604 JJK			
5. Generator's Name and Mailing Address Zions First National Bank 3135 N Fairfield Rd Suite D Dayton UT 84041 Generator's Phone: 801 844-7392				Generator's Site Address (if different than mailing address) 333 Turnbull Canyon Rd City of Industry CA 91745				
6. Transporter 1 Company Name J C Environmental				U.S. EPA ID Number CAT000209875				
7. Transporter 2 Company Name Advanced Chemical Transport				U.S. EPA ID Number CAR000070540				
8. Designated Facility Name and Site Address US Ecology Nevada, Inc. P.O Box 578, Hwy 95, 11 miles S. Beatty Beatty, NV 89003 Facility's Phone: 800-239-3943				U.S. EPA ID Number NVT330010000				
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit WL/Vol.	13. Waste Codes		
		No.	Type					
X	1. NA3077, Hazardous waste, solid, n.o.s., (lead, mercury), 9, PGIII	001	DP	200	P	D008	D009	352
	2.							
	3.							
	4.							
14. Special Handling Instructions and Additional Information 1) 070167954-0; ERG #: 171; ZIU- Project Number: SD-28591								
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.								
Generator's/Offeror's Printed/Typed Name Julius Hannegan				Signature [Signature]		Month Day Year 05/06/10		
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____								
17. Transporter Acknowledgment of Receipt of Materials								
Transporter 1 Printed/Typed Name Julius Hannegan				Signature [Signature]		Month Day Year 05/06/10		
Transporter 2 Printed/Typed Name Cheryl Moherman				Signature [Signature]		Month Day Year 05/06/10		
18. Discrepancy								
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection								
Manifest Reference Number: _____								
18b. Alternate Facility (or Generator)				U.S. EPA ID Number				
Facility's Phone: _____								
18c. Signature of Alternate Facility (or Generator)						Month Day Year		
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)								
1.		2.		3.		4.		
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a								
Printed/Typed Name				Signature		Month Day Year		

American Ecology Corporation Land Disposal Restriction Form

GENERATOR: Zions First National Bank EPA ID NUMBER: CAC002651229
 WASTE STREAM or PROFILE NUMBER: 070167954-0 MANIFEST DOC. NO. 1070146053K LINE NO. 1
 WASTE IS A: WASTEWATER NON-WASTEWATER DEBRIS
 NOTIFICATION FREQUENCY: ONE TIME REQUIRED WITH EACH SHIPMENT
 EPA WASTE CODES (from 40 CFR 268.40): DXUX DXUY
 UNDERLYING HAZARDOUS CONSTITUENTS (from 40 CFR 268.48): LEAD, MERCURY

- A. **Restricted Waste Meets Treatment Standards (40 CFR 268.7(a) (3))**
 The restricted waste identified above meets the treatment standards in 40 CFR 268.40 or Alternative LDR treatment standards for contaminated soil 40 CFR 268.49 and can be landfilled disposed without further treatment. I have attached all supporting analytical data, where available.
 I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.
- B. **Restricted Waste Treated To Treatment Standards (40 CFR 268.7(b) (1) & 268.7 (b) (2))**
 The treatment residue, or extract of such residue, or the restricted waste identified above has been tested to assure that the treatment residue or extract meet all applicable treatment standards in 40 CFR 268.40 and/or performance standards in 40 CFR 268.45. I have attached all supporting analytical data, where available.
 I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.
- C. **Restricted Waste With Technology Based Treatment Standards (40 CFR 268.7(b) (4))**
 I certify under penalty of law that I personally have examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that based on my inquiry of those individuals immediately responsible for obtaining this information. I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards specified in 40 CFR 268.40, without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.
- D. **Restricted Waste Decharacterized But Requires Treatment For UHC (40 CFR 268.9)**
 I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remove the hazardous characteristic. This decharacterized waste contains Underlying Hazardous Constituents (UHC) that require further treatment to meet the universal treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.
- E. **Restricted Waste Subject To Treatment (40 CFR 268.7(a) (2))**
 The restricted waste identified above must be treated to the applicable treatment standards in 40 CFR 268.40, or treated to comply with applicable prohibitions set forth in Part 268.32 or RCRA Section 3004(d). I have attached all supporting analytical data, where available.
- F. **Hazardous Debris Subject To Treatment (40 CFR 268.45)**
 This hazardous debris identified above must be treated to the alternative treatment standards in 40 CFR 268.45.
- G. **Restricted Waste Subject To A Variance or Extension (40 CFR 268.7(a) (4))**
 This restricted waste identified above is subject to a case-by case exemption under 40 CFR 268.5, an exemption under 40 CFR 268.6 or a nationwide capacity variance under Subpart C of 40 CFR 268, and is not prohibited from land disposal. LDR prohibitions become effective on _____ (date) for this restricted waste. The corresponding treatment standard(s) are promulgated in 40 CFR 268.40. I have attached all supporting analytical data, where available.
- H. **Restricted Waste Managed in A "Lab Pack" (40 CFR 268.7(a) (9))**
 I certify under penalty of law that I personally have examined and am familiar with the waste and that the lab pack contains only waste that have been excluded under appendix IV to 40 CFR Part 268 and that this lab pack may be sent to a combustion facility in compliance with the alternative treatment standards for lab packs at 40 CFR 268.42(c). I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

I certify and warrant that the information that appears on this form, and appended documents, is true and correct. I have correctly indicated how my waste is to be managed in accordance with 40 CFR 268. My certification is based on personal examination of the information submitted, or is based on my inquiries of those individuals responsible for obtaining the information.

Authorized Signature [Signature] Title PROSPECTOR MGR Date 5/6/10
UHC list from 40 CFR Part 268.48 available upon request

STRAIGHT BILL OF LADING - SHORT FORM

ORIGINAL - NOT NEGOTIABLE

Shipper's No. _____

Carrier's Name: Can Resources Inc Carrier's No. _____

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of lading,

333 TURNBULL CANTON RD
 At CITY OF INDIANAPOLIS, IN (Date) 4/27/70 FROM Zone First National Bank

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as shown below, which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or route, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property, over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in the Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

(Mail or street address for purposes of notification only.)

Consigned TO Can Resources Inc
 On Collect on Delivery Shipments, the letters "C.O.D." must appear before consignee's name or as otherwise provided in item 400, Sec. 1.
 Destination 2310 MILWAUKEE TALLEY RD Street San Diego City
 County CA State 92154 Zip
 Route _____ Delivery Address *
 (*To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)
 Delivering Carrier _____ Car or Vehicle Initials and No. _____
 Collect on Delivery \$ _____ And Remit to _____

Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse or the consignee, the consignee shall sign the following statement:
 The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of consignee)
C. O. D. Charges to be Paid by
 Shipper Consignee

If charges are to be prepaid, write or stamp here, "To Be Prepaid."

No. Packages	H.W.	Kind of Package	Description of Articles, Special Marks, and Exceptions	*Weight (Subject to Correction)	Class or Rate	Check Column
4PE		EQUIPMENT (WITH LEAD BATTERY PAINT)	(BATTERY, SHAR, 2 DUST COLLECTORS) (2 TRAYS)	54,000#		

Received \$ _____ to apply in prepayment of the charges on the property described hereon.

Agent or Cashier _____

Per _____
 (The signature here acknowledges only the amount prepaid.)

Charges Advanced: \$ _____

*The fiber containers used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Rule 41 of the Uniform Freight Classification and Rule 5 of the National Motor Freight Classification.
 † Shipper's imperte in lieu of stamp; not a part of bill of lading approved by the Interstate Commerce Commission.

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.
 NOTE - When the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

Shipper, Per [Signature] ON BEHALF OF ZONE BANK
JULIUS HANSEN Agent
 Permanent post-office address of shipper, _____ Per [Signature]

1

STRAIGHT BILL OF LADING - SHORT FORM

ORIGINAL - NOT NEGOTIABLE

Shipper's No. _____

Carrier's Name: J.C. ENVIRONMENTAL COMPANY INC.

Carrier's No. _____

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of lading,

333 TOWER BELL CANYON RD
 AT CITY OF INDUSTRY, CA 91706 (Date) 5/6/10 FROM ZION FIRST NATIONAL BANK

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as shown below, which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or route, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination, if it mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in the Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of this said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his agents.

(Mail or street address for purposes of notification only)

Consigned TO BURGESS DRUM COMPANY
On Collect on Delivery Shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

Destination 535 W. ALONDRA BLVD Street GARDENA City
 County CA State 90248 Zip

Route _____ Delivery Address ★
(*To be filled in only when shipper desires and governing tariffs provide for delivery thereto.)

Delivering Carrier _____ Car or Vehicle Initials and No. _____

Collect on Delivery \$ _____ And Remit to _____

Street _____ City _____ State _____

No. Packages	H.M.	Kind of Package, Description of Articles, Special Marks, and Exceptions	Weight (Subject to Correction)	Class or Rate	Check Column
4DF		EMPTY DRUMS PREVIOUSLY CONTAINING OIL	40P		

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.
 NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

JULIUS HANNEGAN ON BEHALF OF ZIONS FIRST NATIONAL BANK Shipper, Per

J.C. ENVIRONMENTAL COMPANY Agent
 Per JG 5/6/10

Permanent post-office address of shipper, _____

Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
 The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of consignor) _____

C. O. D. Charges to be Paid by
 Shipper Consignee

If charges are to be prepaid, write or stamp here, "To be Prepaid."

Received \$ _____ to apply in prepayment of the charges on the property described hereon.

Agent or Cashier _____

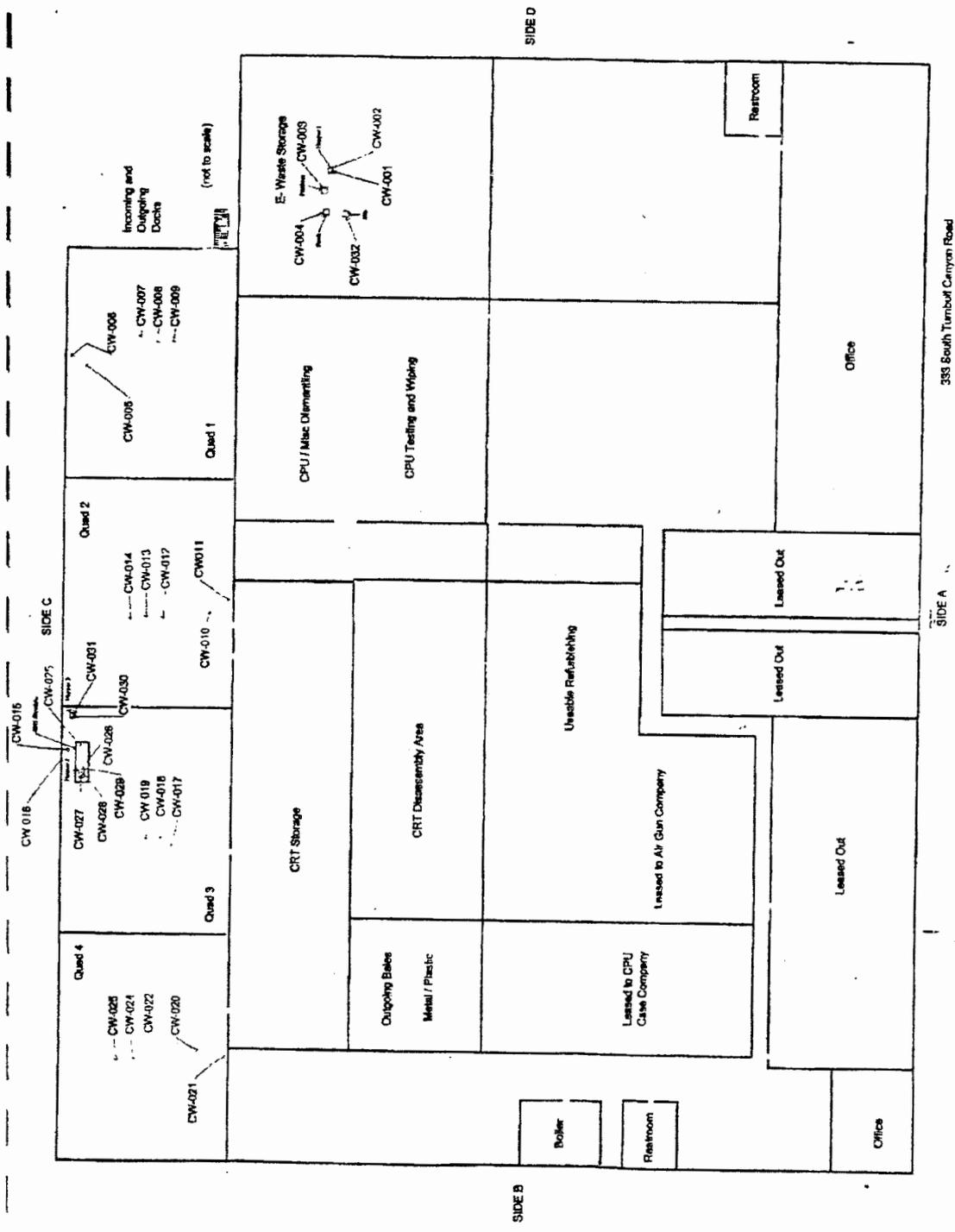
Per _____
(The signature here acknowledges only the amount prepaid.)

Charge Advanced _____

\$ _____
*The fibre containers used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Rule 41 of the Uniform Freight Classification and Rule 3 of the National Motor Freight Classification.
 *Shipper's imprint in lieu of stamp; not a part of bill of lading approved by the Interstate Commerce Commission.

1

APPENDIX E
MAPS OF SAMPLING LOCATIONS



355 South Turnbull Canyon Road

SIDE A

SIDE B

SIDE D

SIDE C

(not to scale)

Quad 1

Quad 2

Quad 3

Quad 4

Incoming and Outgoing Doors

E-Waste Storage

CPU/Misc Dismantling

CPU Testing and Wiping

CRT Storage

CRT Disassembly Area

Unstable Refurbishing

Leased to Air Gun Company

Leased to CPU Case Company

Leased Out

Leased Out

Leased Out

Leased Out

Office

Restroom

Boiler

Restroom

Office

CW-005

CW-006

CW-007

CW-008

CW-009

CW-010

CW-011

CW-012

CW-013

CW-014

CW-015

CW-016

CW-017

CW-018

CW-019

CW-020

CW-021

CW-022

CW-023

CW-024

CW-025

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CW-027

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CW-029

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CW-032

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CW-022

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CW-025

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CW-030

CW-031

CW-032

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CW-002

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CW-004

CW-005

CW-006

CW-007

CW-008

CW-009

CW-010

CW-011

CW-012

CW-013

CW-014

CW-015

CW-016

CW-017

CW-018

CW-019

CW-020

CW-021

CW-022

CW-023

CW-024

CW-025

CW-026

CW-027

CW-028

CW-029

CW-030

CW-031

CW-032

CW-001

CW-002

CW-003

CW-004

CW-005

CW-006

CW-007

CW-008

CW-009

CW-010

CW-011

CW-012

CW-013

CW-014

CW-015

CW-016

CW-017

CW-018

CW-019

CW-020

CW-021

CW-022

CW-023

CW-024

CW-025

CW-026

CW-027

CW-028

CW-029

CW-030

CW-031

CW-032

CW-001

CW-002

CW-003

CW-004

CW-005

CW-006

CW-007

CW-008

CW-009

CW-010

CW-011

CW-012

CW-013

CW-014

CW-015

CW-016

CW-017

CW-018

CW-019

CW-020

CW-021

CW-022

CW-023

CW-024

CW-025

CW-026

CW-027

CW-028

CW-029

CW-030

CW-031

CW-032

CW-001

CW-002

CW-003

CW-004

CW-005

CW-006

CW-007

CW-008

CW-009

CW-010

CW-011

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CW-013

CW-014

CW-015

CW-016

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CW-018

CW-019

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CW-021

CW-022

CW-023

CW-024

CW-025

CW-026

CW-027

CW-028

CW-029

CW-030

CW-031

CW-032

CW-001

CW-002

CW-003

CW-004

CW-005

CW-006

CW-007

CW-008

CW-009

CW-010

CW-011

CW-012

CW-013

CW-014

CW-015

CW-016

CW-017

CW-018

CW-019

CW-020

CW-021

CW-022

CW-023

CW-024

CW-025

CW-026

CW-027

CW-028

CW-029

CW-030

CW-031

CW-032

CW-001

CW-002

CW-003

CW-004

CW-005

CW-006

CW-007

CW-008

CW-009

CW-010

CW-011

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CW-017

CW-018

CW-019

CW-020

CW-021

CW-022

CW-023

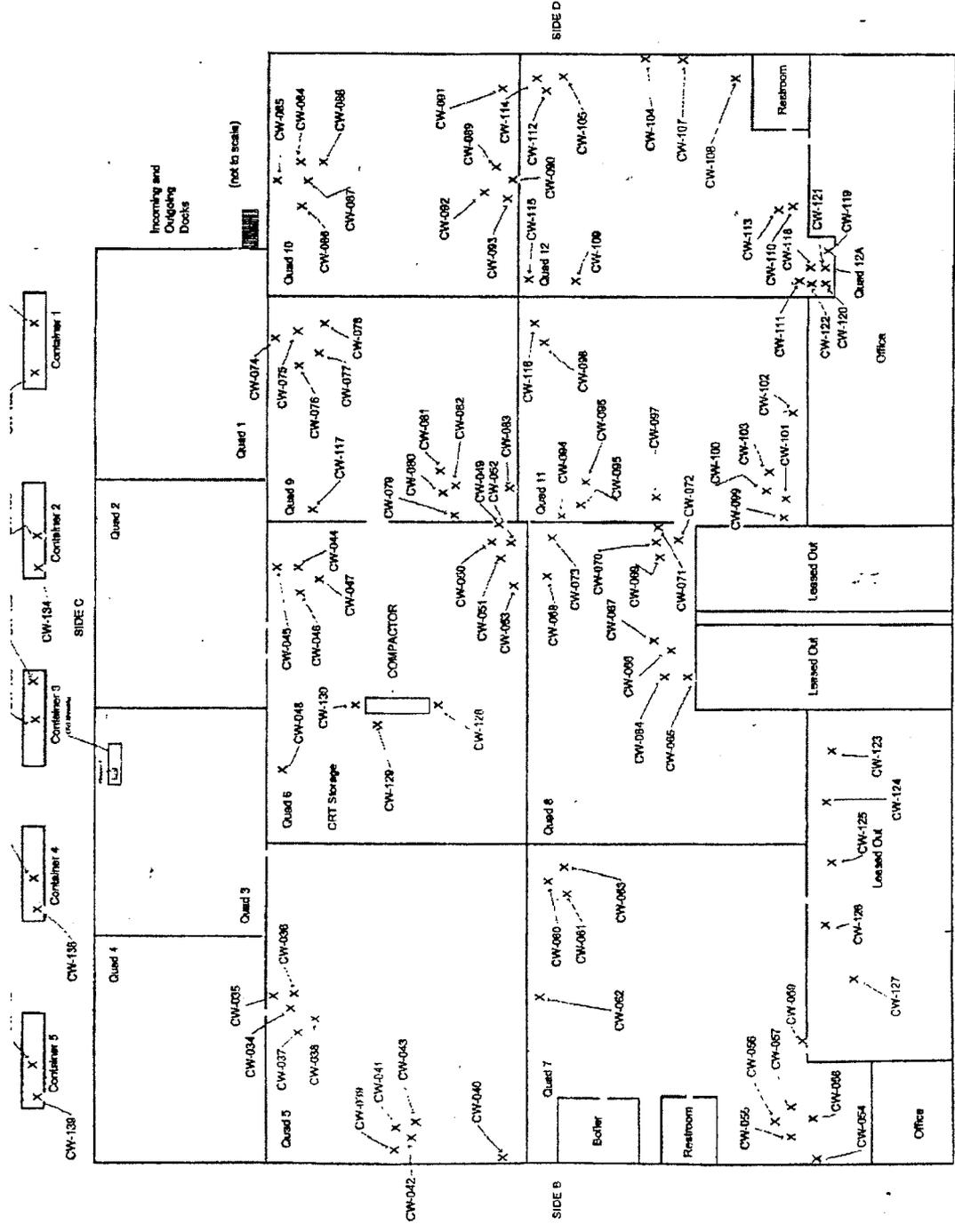
CW-024

CW-025

CW-026

CW-027

CW-028



333 South Tumbull Canyon Road

SIDE A

SIDE B

SIDE D

(not to scale)

Incoming and Outgoing Trucks

Container 1
Container 2
Container 3
Container 4
Container 5

Quads 1

Quads 2

Quads 3

Quads 4

Quads 5

Quads 6

Quads 7

Quads 8

Quads 9

Quads 10

Quads 11

Quads 12

COMPACTOR

CRT Storage

Boiler

Restroom

Office

Leased Out

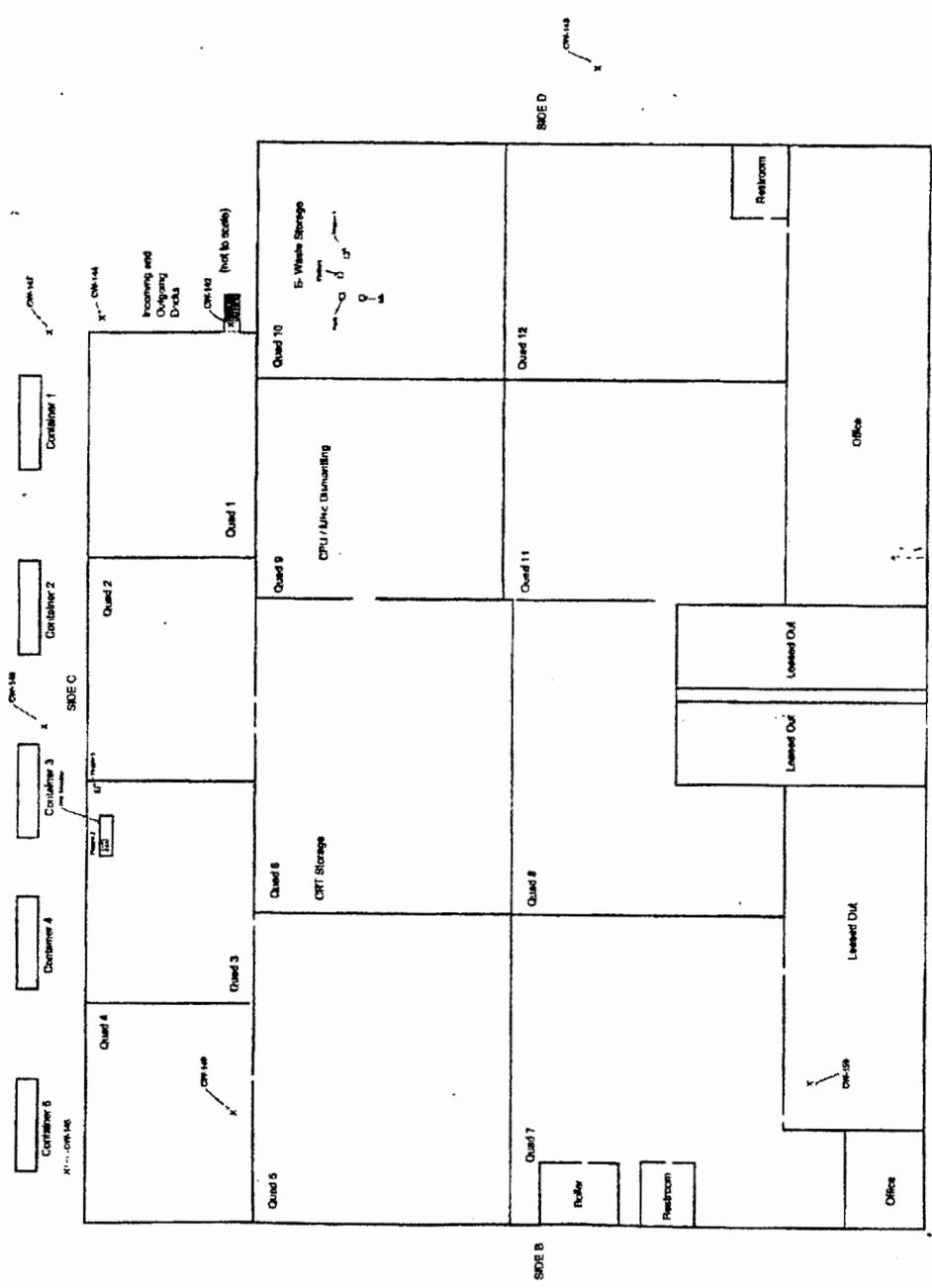
Leased Out

Leased Out

Leased Out

Leased Out

Office

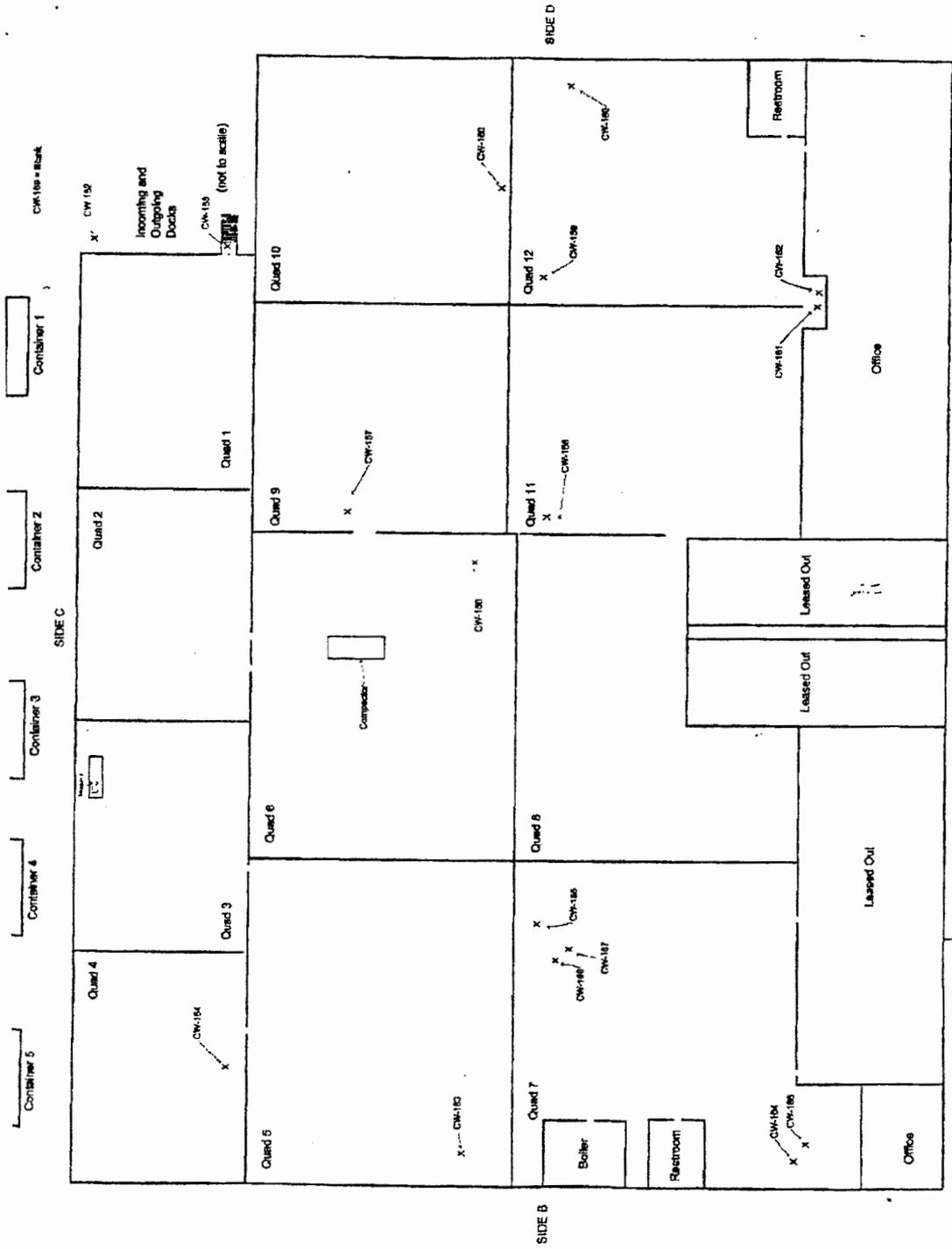


333 South Turnout Canyon Road

SDE A

SDE D

SDE B

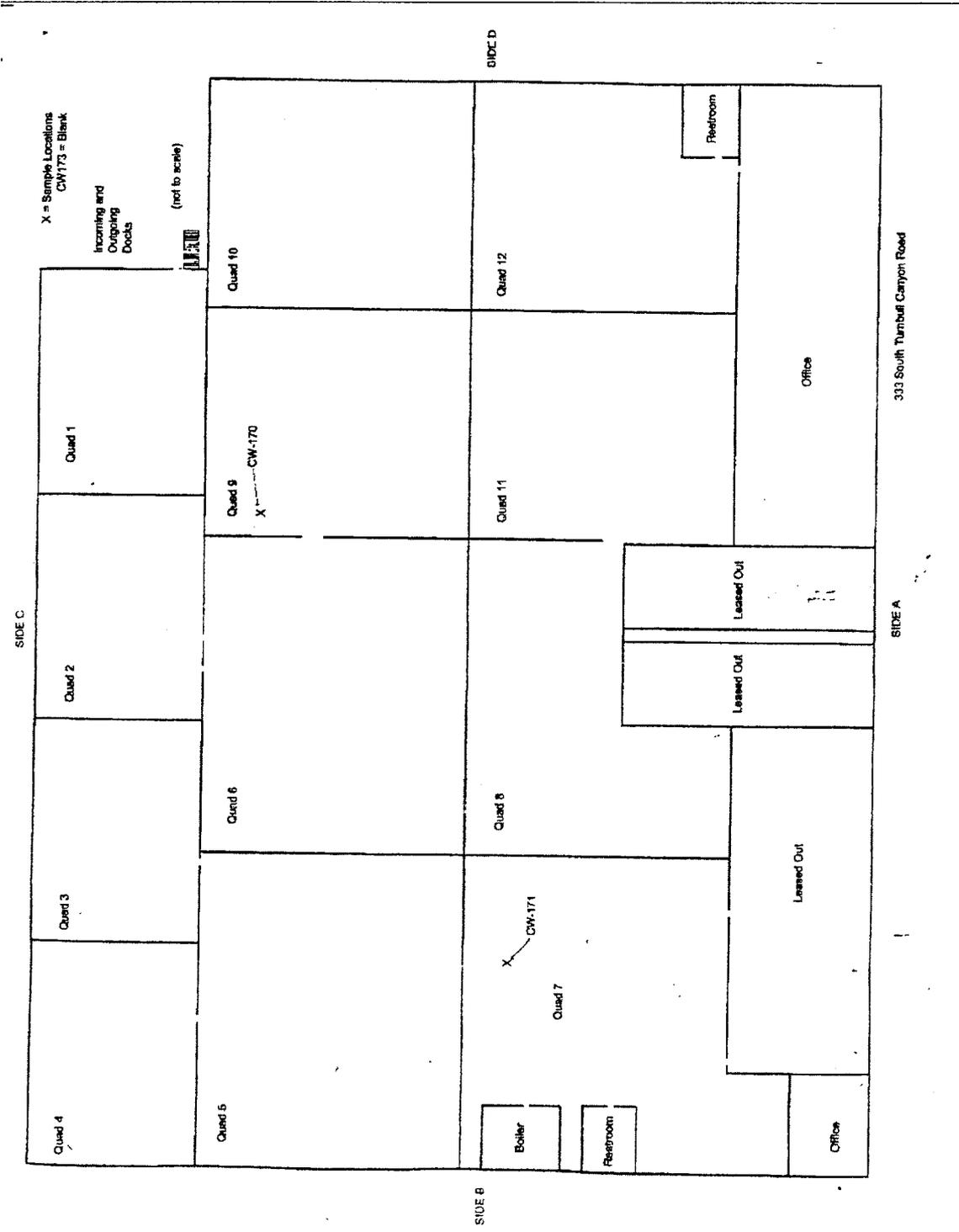


333 South Turnbull Canyon Road

SIDE A

SIDE D

SIDE B



333 South Turnbull Canyon Road

APPENDIX F
LEAD BASED DUST CLEARANCE REPORT



©

AAA LEAD Consultants and Inspections, Inc.

Consulting - Inspections - Risk Assessment - Project Monitoring
STATE CERTIFIED / INSURED

**LEAD BASED DUST CLEARANCE
REPORT
FOR
ADVANCED CHEMICAL TRANSPORT**

PERFORMED AT

“ARC” PROJECT
333 TURNBULL CANYON ROAD
HACIENDA HEIGHTS, CA 91745

January 20, 2010 through February 19, 2010

2 COPY



©

AAA LEAD Consultants and Inspections, Inc.

Consulting - Inspections - Risk Assessment - Project Monitoring
STATE CERTIFIED / INSURED

February 21, 2010

Advanced Chemical Transport
2213 Meyers Avenue
Escondido, California, 92029

RE: Lead Based Paint Clearance for the "ARC" Project located at 333 Turnbull Canyon Road, Hacienda Heights, Ca 91745

Beginning on January 20, 2010, AAA Lead Consultants and Inspections, Inc. performed clearance wipe sampling at 333 Turnbull Canyon Road, Hacienda Heights, Ca,. The clearance sampling was performed in the work areas identified by Ellen Pates of the Department of Toxic Substance Control. Site cleanup work had been done under the direction of JC Environmental by Advanced Chemical Transport (ACT). The first group of samples included thirty-three samples from different components including, walls, ceilings, floors, walls, hoppers, lights, pipes and other miscellaneous pieces of equipment. The samples were collected in the areas previously cleaned by ACT. The samples were taken directly to state certified laboratory for analysis. Several of the samples failed clearance criteria as established by Ellen Pates.

On January 29, 2010 AAA Lead Consultants and Inspections, Inc. returned to the job site to take samples in the areas that failed along with the remainder of the site the crew had now finished cleaning. AAA Lead took a total of one hundred and seven lead clearance samples including the ten areas that had previously failed clearances along with two mercury clearance wipe samples as directed by Ellen Pates. On the second round of sampling several more clearance wipe samples failed the established clearance criteria.

AAA Lead returned to the site on February 2, 2010 to retake samples in the areas that failed the last session. A total of ten lead clearance samples were taken along with two separate samples to determine if cadmium was present. The crew was still working on re-cleaning areas that were not yet ready to be tested. The samples were taken to the laboratory on February 5th for same day rush results. This time three of the samples were above the established clearance criteria.

February 11, 2010 AAA Lead Consultants and Inspections, Inc. returned to the site to take the final clearance samples from the remaining areas the crew had re-cleaned. A total of eighteen samples were collected in the areas requested by Ellen Pates,

including a blank sample for QC purposes. All samples were submitted the next day to the laboratory for analysis. Two of the samples failed the established clearance criteria by a very low margin. Mr. Cohn contacted Julius Hannegan of JC Environmental with the results. Mr. Hannegan had the crew from ACT return to the site and clean the two areas that failed.

Mr. Cohn of AAA Lead Consultants and Inspections, Inc. returned to the site on February 19, 2010 and took clearance samples in the two areas that most recently failed. The samples were submitted for a same day rush analysis. All samples were below the 400ug/ft² as established by Ellen Pates. A copy of all laboratory results including site maps has been included in this summary of events. I will forward a copy of our findings to JC Environmental.

Please feel free to call if you have any further questions.

Sincerely,

 **COPY**

Michael Cohn
DHS # M-437

EMS LABORATORIES, INC.
FAX MEMO
CONFIDENTIAL

NO. PAGES: 3
DATE: 2/3/10
ATTENTION: Michael Cohn
COMPANY: AAA Lead Consultants & Inspections
SUBMITTED BY: MT
FAX NUMBER: 951-582-9073
SUBJECT: 135210 - Mercury
REMARKS: Thank You!

RESPONSE REQUESTED: YES: _____

TELEPHONE NUMBER: 626-568-4065

FAX NUMBER: 626-796-5282

Note: If a fax copy of a report or letter is requested by a client, EMS Laboratories, Inc., cannot guarantee confidentiality. It is the responsibility of the client to ensure that the confidentiality of the FAX message is appropriately protected.

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SUBMITTAL FORM *Laboratory Services*

135210

PAGE 1 OF 1

ANALYSIS TIME: STD 48 HR 24 HR
HR WKND OTHER

RELINQUISHED BY Michael Cohn

TIME / DATE 1/30/10 1:00pm

CLIENT AAA Lead Consultants & Inspections Inc

DATE OF SHIPMENT _____ CARRIER _____

ADDRESS 1307 West Sixth Street #134
Corona, CA 92882

CLIENT P.O. NO. _____

CLIENT JOB/PROJECT ID NO(S) ARC

TELEPHONE (909) 376-1144

CONTACT Michael Cohn

PACKAGE SHIPPED FROM _____

RESULTS REQUESTED VIA VERBAL FAX

CLIENT FAX NO. 951-582-9073

(NOTE: Complete written reports will follow all analyses, in addition to any prior transmitted verbal or fax results.)

DATE/TIME OF SAMPLE COLLECTION 1/29/10 4:30pm

SAMPLE PRESERVATIVES _____ HOLDING TIMES _____

NO. OF SAMPLES SENT 2 SAMPLER'S NAME Michael Cohn

SIGNATURE

PRINTED

TYPE: WATER WASTE WATER SOIL FILTER SORBENT TUBE IMPINGER OTHER wipe

(FOR EMS ONLY)

EMS Sample No.

CLIENT SAMPLE NO.

DESCRIPTION/LOCATION OF ANALYSIS

VERBAL
DATE/TIME
(P. 2 OF 3)

5210 -1	MC-1	office Duct 5' 1/2" X 15"	mercury, cadmium
-2	MC-2	Quad 2 Floor 13' X 13"	mercury, cadmium

135210

Laboratory No. _____

Received By [Signature]

Time 8:26

Date of Package Delivery 2/1/10

Shipping Bill Retained: YES NONE

Condition of Package on Receipt OK

Condition of Custody Seal None

(NOTE: If the package has sustained substantial damage or the custody seal is broken, stop and contact the project manager and the shipper.)

No. of Samples 2 Chain-of-Custody Signature _____

Date of Acceptance into Sample Bank 2/1/10 Misc. Info _____

Disposition of Samples EMS labs

EMS Laboratories, Inc.

Page 2 of 2

Chemistry Report

Date of Analysis: 2/1/10
 Lab Number: 135210
 Client: AAA Lead Consultants & Inspectors
 Date Received: 2/1/10
 Project Number: NA
 Analyte: Hg
 Matrix: Wipe
 Method: OSHA ID 145
 Comment:

Reporting Limit (µg): 0.40
 Blank (µg): <0.40

Sample ID	Wipe Area (ft ²)	Hg	Weight (µg)	Concentration (µg/ft ²)
MC-1	0.16		0.56	3.5
MC-2	1.0		< 0.40	< 0.40

Results are corrected for the field blank or EMS blank if the analyte is detected in the blank.
 µg: microgram

Chemist

FSA

EMS LABORATORIES, INC.
FAX MEMO
CONFIDENTIAL

NO. PAGES: 3
DATE: 2/10/10
ATTENTION: Michael Cohn
COMPANY: AAA Lead Consultants
SUBMITTED BY: MT
FAX NUMBER: 951-582-9073
SUBJECT: 135345 - Cadmium Results
REMARKS: Thank You!

RESPONSE REQUESTED; YES: _____

TELEPHONE NUMBER: 626-568-4065

FAX NUMBER: 626-796-5282

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EMS Laboratories

Page 2 of 2

Laboratory Report

Sample Info

Date of Analysis: 2/10/2010
 Lab ID: 135345
 Client: AAA Lead Consultants & Inspectors
 Date Received: 2/5/2010
 Project Number: ARC 333 Turnbull Canyon Road
 Analyte: Cd
 Matrix: WIPE
 Method: OSHA ID 121
 Comments:

Reporting Limit (ug): 0.4
 Method blank (ug): <0.4

Sample Results

Sample Name	Wipe Area (sq. ft.)	Cd Weight (ug)	Cd Concentration (ug/sq.ft)
Cadmium 1	1.00	8.9	8.9
Cadmium 2	0.21	22	110

Chemist: Fitch

SUBMITTAL FORM/Laboratory Services

135345

PAGE OF

TURNAROUND TIME: STD 48 HR 24 HR
8 HR WKND OTHER

RELINQUISHED BY Mike Cohn

CLIENT AAA Lead Consultants & Insp, Inc.

TIME / DATE 2/3/10 Fed Ex 6:00pm

ADDRESS 1307 West Sixth St #134

DATE OF SHIPMENT 2/2/10 CARRIER Fed Ex

Corona, CA 92882

CLIENT P.O. NO. _____

TELEPHONE (609) 576-1144

CLIENT JOB/PROJECT ID NO(S) A7C

333 Turnbull Canyon Road

CONTACT Michael Cohn

PACKAGE SHIPPED FROM Corona, CA

RESULTS REQUESTED VIA VERBAL FAX

CLIENT FAX NO. 951-582-9073

(NOTE: Complete written reports will follow all analyses, in addition to any prior transmitted verbal or fax results.)

DATE/TIME OF SAMPLE COLLECTION 2/3/10 333 Turnbull Canyon Road 10:00 AM

SAMPLE PRESERVATIVES No HOLDING TIMES _____

NO. OF SAMPLES SENT 2 SAMPLER'S NAME Michael Cohn

TYPE: WATER WASTE WATER SOIL FILTER SORBENT TUBE IMPINGER OTHER Wipe

(FOR EMS ONLY)

135345

CLIENT SAMPLE NO. DESCRIPTION LOCATION ANALYSIS

Cadmium 1 Quad 2 side 'B' 'C' 12'x12" Cadmium

Cadmium 2 Leased Out Office Ch 2'x15" Cadmium

135345

Laboratory No. _____ Received By [Signature] Time 9:47

Date of Package Delivery 2/5/10 Shipping Bill Returned: YES NONE

Condition of Package on Receipt OK Condition of Custody Seal _____
(NOTE: If the package has sustained substantial damage or the custody seal is broken, stop and contact the project manager and the shipper.)

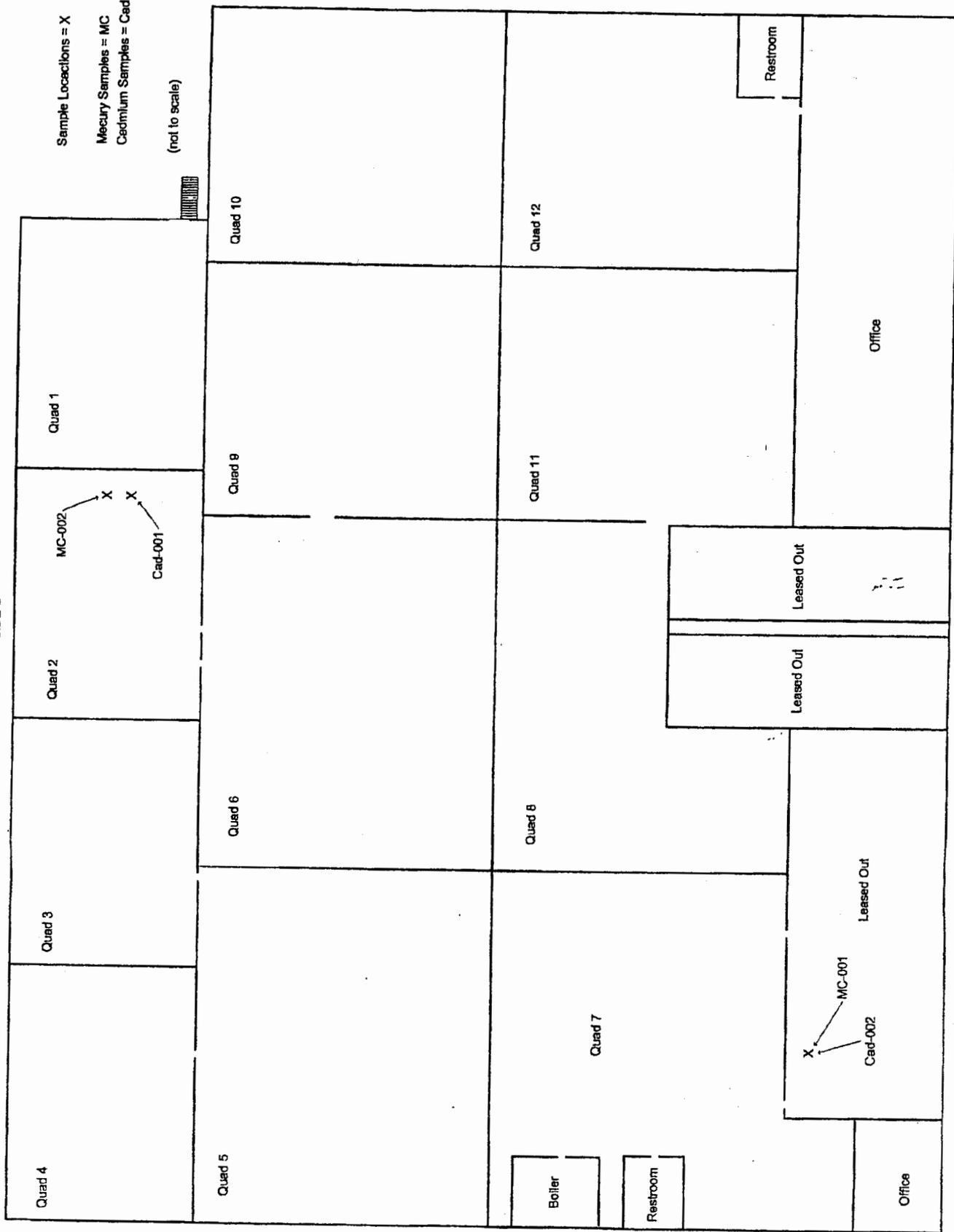
No. of Samples 2 Chain of Custody Signature [Signature]

Date of Acceptance into Sample Bank 2/5/10 Misc. Info _____

Disposition of Samples EMS



SIDE C



SIDE D

SIDE B

333 South Tumbull Canyon Road

SIDE A



Micron Environmental Labs

3565 Lexington Av.
El Monte, CA 91731

Analytical Method: EPA SW846-3050-7420
AIHA (ELPAT) ID No.: 103012
CA ELAP Certificate NO. 2297

Date: 1/27/10
Micron Reference No. 10610012

Lead (Pb) in wipes Summary Results

Project: 333 S. Turnbull Canyon Rd.

Analyst: Carlo Gamez

Company: AAA Lead Consultants and Inspections, Inc.

Date Collected: 1/20/10

Date Received: 1/22/10

Address: 1307 W. Sixth St. Ste. 134

Date Analyzed: 1/27/10

City, State, Zip: Corona, CA 92882

No. of samples: 33

Sample ID	Sample Description	Area Sampled(ft2)	Vol. (ml)	Dil. Factor	Conc. mg/L	Results µg/ft2
CW-001	Dust Wipes	0.67	25	1	44.91	1675.7
CW-002	Dust Wipes	0.67	25	1	23.61	881.0
CW-003	Dust Wipes	1.00	25	1	5.16	129.0
CW-004	Dust Wipes	0.67	25	1	7.36	274.6
CW-005	Dust Wipes	1.00	25	1	4.18	104.5
CW-006	Dust Wipes	1.00	25	1	0.54	13.5
CW-007	Dust Wipes	1.00	25	1	0.51	12.8
CW-008	Dust Wipes	1.50	25	1	2.37	39.5
CW-009	Dust Wipes	0.88	25	1	7.16	203.4
CW-010	Dust Wipes	1.00	25	1	12.08	302.0
CW-011	Dust Wipes	1.00	25	1	0.63	15.8
CW-012	Dust Wipes	1.00	25	1	0.45	11.3
CW-013	Dust Wipes	1.63	25	1	6.79	104.1
CW-014	Dust Wipes	0.88	25	1	4.19	119.0
CW-015	Dust Wipes	1.00	25	1	29.24	731.0
CW-016	Dust Wipes	1.00	25	1	1.28	32.0
CW-017	Dust Wipes	1.00	25	1	0.52	13.0
CW-018	Dust Wipes	2.13	25	1	27.38	321.4
CW-019	Dust Wipes	0.88	25	1	24.71	702.0
CW-020	Dust Wipes	1.00	25	1	41.17	1029.3
CW-021	Dust Wipes	1.00	25	1	1.23	30.8
CW-022	Dust Wipes	1.00	25	1	3.14	78.5
CW-023	Dust Wipes	0.88	25	1	6.58	186.9
CW-024	Dust Wipes	1.50	25	1	6.31	105.2
CW-025	Dust Wipes	1.00	25	1	6.19	154.8
CW-026	Dust Wipes	1.00	25	1	3.07	76.8
CW-027	Dust Wipes	0.33	25	1	49.22	3728.8

Carlo Gamez
Analyst Signature

CW-028	Dust Wipes	0.44	25	1	61.01	3466.5
CW-029	Dust Wipes	0.67	25	1	13.38	499.3
CW-030	Dust Wipes	0.44	25	1	16.82	955.7
CW-031	Dust Wipes	0.50	25	1	78.27	3913.5
CW-032	Dust Wipes	1.00	25	1	11.75	293.8
CW-033	Dust Wipes	1.00	25	1	0.02	< 10

$\mu\text{g}/\text{ft}^2$ = micrograms per square foot

MDL for Micron Labs = 4.177 $\mu\text{g}/\text{wipe}$

Catlo Gamery
Analyst Signature

Dust/Wipe Sample Log

Micron Labs
Arcadia, California



Company AAA Lead Consultants and Inspections, Inc.

No. of Samples 33 For Lab Use Only
 Client Project No. ARC Micron Job No. 10610012
 Client Project Ref. 333 South Turnbull Canyon Road

Sample Data Log

	Date Collected	Client Sample ID	Sample Location	Side	Dimensions
1	1/20/10	CW-001	Hopper 1 Left	D	6" x 16"
2	1/20/10	CW-002	Hopper 2 Right	D	6" x 16"
3	1/20/10	CW-003	Green Platform	D	12" x 12"
4	1/20/10	CW-004	Reck & Waste Storage Area	D	4" x 24"
5	1/20/10	CW-005	Quzd 1 tooth Floor	C C	12" x 12"
6	1/20/10	CW-006	Quzd 1 Wall	C C	12" x 12"
7	1/20/10	CW-007	Quzd 1 Ceiling	C C	12" x 12"
8	1/20/10	CW-008	Quzd 1 Pipe	C C	9" x 24"
9	1/20/10	CW-009	Quzd 1 Light Fixture	C C	3 1/2" x 36"
10	1/20/10	CW-010	Quzd 2 Floor	A C	12" x 12"
11	1/20/10	CW-011	Quzd 2 Wall	A C	12" x 12"
12	1/20/10	CW-012	Quzd 2 Ceiling	A C	12" x 12"
13	1/20/10	CW-013	Quzd 2 Pipe	A C	6 1/2" x 36"
14	1/20/10	CW-014	Quzd 2 Light Fixture	A C	3 1/2" x 36"
15	1/20/10	CW-015	Quzd 3 Floor	C C	12" x 12"
16	1/20/10	CW-016	Quzd 3 Wall	C C	12" x 12"
17	1/20/10	CW-017	Quzd 3 Ceiling	C C	12" x 12"
18	1/20/10	CW-018	Quzd 3 Pipe	C C	8 1/2" x 36"
19	1/20/10	CW-019	Quzd 3 Light Fixture	C C	3 1/2" x 36"
20	1/20/10	CW-020	Quzd 4 Floor	A C	12" x 12"

Relinquished by [Signature] Date 1/22/10 Time 11:10
 Received by [Signature] Date 1/22/10 Time 11:10

Dust/Wipe Sample Log

Micron Labs
Arcadia, California



Company AAA Lead Consultants and Inspections, Inc.

No. of Samples

For Lab Use Only

Client Project No. A.R.C.

Micron Job No.
10610012

Client Project Ref. 333 Turnbull Canyon Road

Sample Data Log

	Date Collected	Client Sample ID	Sample Location	Side	Dimensions
1	1/20/10	CW-021	Quard 4 Wall	A C	12" X 12"
2	1/20/10	CW-022	Quard 4 Ceiling	A C	12" X 12"
3	1/20/10	CW-023	Quard 4 Light Fixture	A C	3 1/2" X 36"
4	1/20/10	CW-024	Quard 4 Pipe	A C	6" X 36"
5	1/20/10	CW-025	Quard 3 CRT Shredder Floor	D C	12" X 12"
6	1/20/10	CW-026	Quard 3 CRT Shredder Ceiling	A C	12" X 12"
7	1/20/10	CW-027	Quard 3 CRT Shredder Hopper 5	A	4" X 12"
8	1/20/10	CW-028	Quard 3 CRT Shredder Hopper 2	B	4" X 16"
9	1/20/10	CW-029	Quard 3 CRT Shredder Hopper 2	C	6" X 16"
10	1/20/10	CW-030	Quard 2 Hopper 3	A	4" X 16"
11	1/20/10	CW-031	Quard 2 Hopper 3	B	4" X 18"
12	1/20/10	CW-032	Silo E Waste Storage Area	D	12" X 12"
13	1/20/10	CW-033	Q C		
14					
15					
16					
17					
18					
19					
20					

Relinquished by

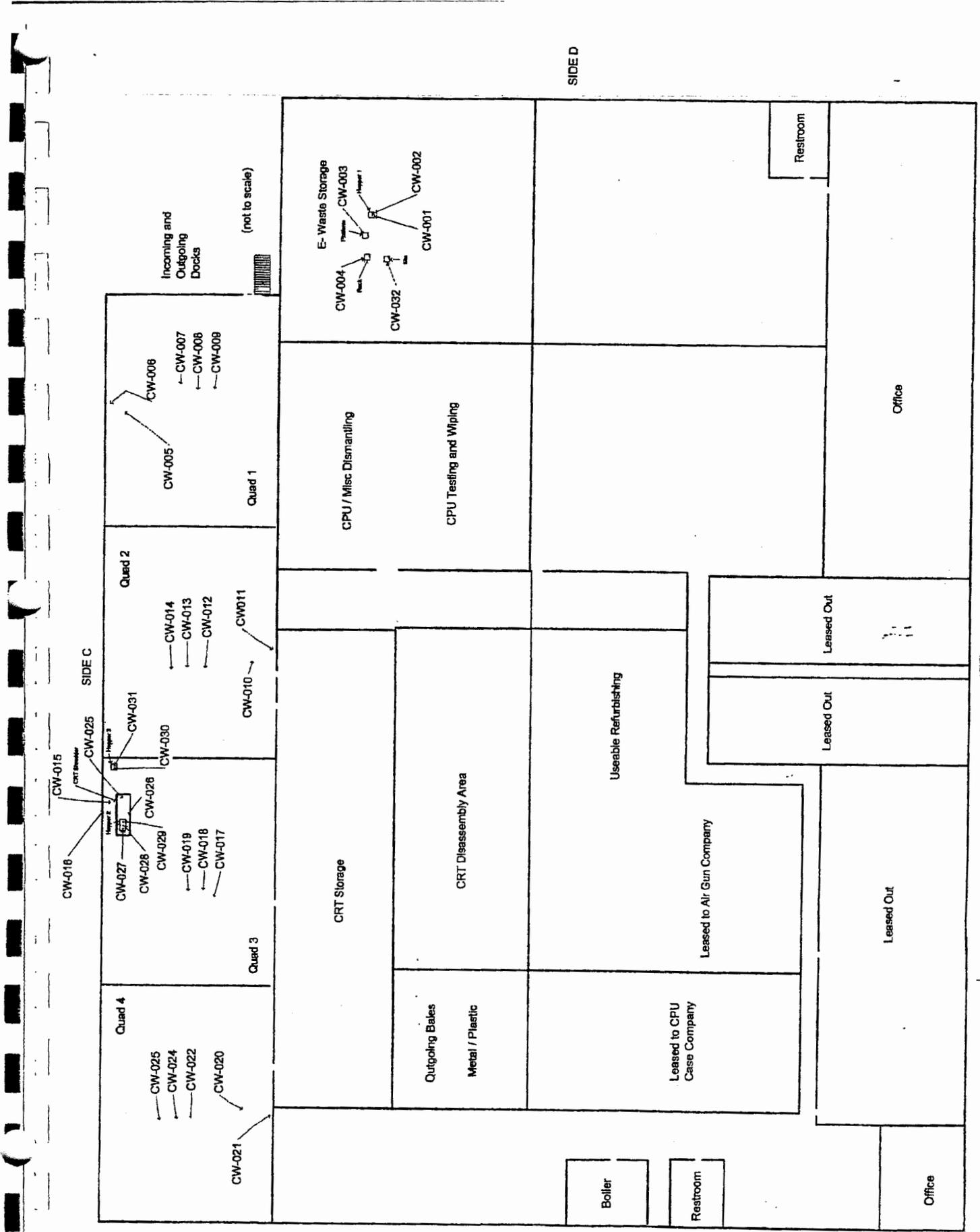
[Signature]

Date 1/22/10 Time 11:10

Received by

[Signature]

Date 1/22/10 Time 11:10



SIDE D

SIDE B

SIDE C

SIDE A

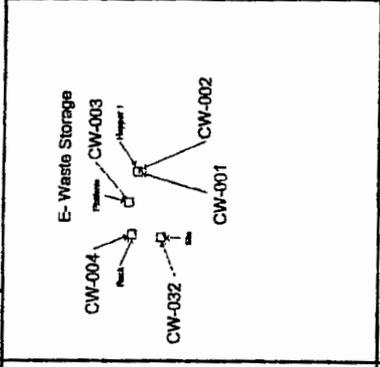
Incoming and Outgoing Docks (not to scale)

Quad 1
 CW-006
 CW-005
 CW-007
 CW-008
 CW-009

Quad 2
 CW-014
 CW-013
 CW-012
 CW-011
 CW-010

Quad 3
 CW-027
 CW-028
 CW-029
 CW-019
 CW-018
 CW-017
 CW-031
 CW-030

Quad 4
 CW-025
 CW-024
 CW-022
 CW-020
 CW-021



CPU / Misc Dismantling
 CPU Testing and Wiping

CRT Storage

CRT Disassembly Area

Outgoing Bales Metal / Plastic
 Leased to CPU Case Company

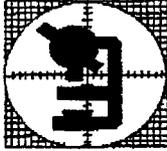
Restroom

Office

Useable Refurbishing
 Leased Out
 Leased Out

Leased to Air Gun Company
 Leased Out

Boiler
 Restroom
 Office



Micron Environmental Labs

3565 Lexington Av.
El Monte, CA 91731

Analytical Method: EPA SW846-3050-7420
AIHA (ELPAT) ID No.: 103012
CA ELAP Certificate NO. 2297

Date: 2/3/10

Micron Reference No. 10610016

Lead (Pb) in wipes Summary Results

Project: 333 Turnbull Canyon Rd.

Analyst: Nick Orozco

Company: AAA Lead Consultants and Inspections, Inc.

Date Collected: 1/29/10

Date Received: 1/30/10

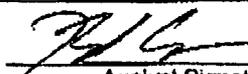
Address: 1307 W. Sixth St. Sta. 134

Date Analyzed: 2/3/10

City, State, Zip Corona, CA 92882

No. of samples: 107

Sample ID	Sample Description	Area Sampled(ft2)	Vol. (ml)	Dil. Factor	Conc. mg/L	Results µg/ft2
CW-034	Dust Wipes	1.00	25	1	14.65	366.3
CW-035	Dust Wipes	1.00	25	1	0.46	11.5
CW-036	Dust Wipes	1.00	25	1	4.40	110.0
CW-037	Dust Wipes	1.00	25	1	5.03	125.8
CW-038	Dust Wipes	1.00	25	1	5.17	129.3
CW-039	Dust Wipes	1.00	25	1	16.26	406.5
CW-040	Dust Wipes	1.00	25	1	0.33	<10
CW-041	Dust Wipes	1.00	25	1	4.10	102.5
CW-042	Dust Wipes	1.00	25	1	19.92	498.0
CW-043	Dust Wipes	1.00	25	1	91.20	2280.0
CW-044	Dust Wipes	1.00	25	1	5.46	136.5
CW-045	Dust Wipes	1.00	25	1	0.18	<10
CW-046	Dust Wipes	1.00	25	1	0.63	15.8
CW-047	Dust Wipes	1.00	25	1	18.33	458.3
CW-048	Dust Wipes	1.00	25	1	5.68	142.0
CW-049	Dust Wipes	1.00	25	1	0.51	12.8
CW-050	Dust Wipes	1.00	25	1	20.43	510.8
CW-051	Dust Wipes	1.00	25	1	0.38	<10
CW-052	Dust Wipes	1.00	25	1	3.92	98.0
CW-053	Dust Wipes	1.00	25	1	13.68	342.0
CW-054	Dust Wipes	1.00	25	1	0.41	10.3
CW-055	Dust Wipes	1.00	25	1	15.87	396.8
CW-056	Dust Wipes	1.00	25	1	0.92	23.0
CW-057	Dust Wipes	1.00	25	1	42.68	1067.0
CW-058	Dust Wipes	1.00	25	1	31.73	793.3
CW-059	Dust Wipes	1.00	25	1	0.80	20.0
CW-060	Dust Wipes	1.00	25	1	18.13	453.3


Analyst Signature

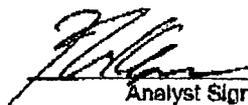
CW-061	Dust Wipes	1.00	25	1	6.67	166.8
CW-062	Dust Wipes	1.00	25	1	28.15	703.8
CW-063	Dust Wipes	1.00	25	1	31.87	796.8
CW-064	Dust Wipes	1.00	25	1	5.20	130.0
CW-065	Dust Wipes	1.00	25	1	0.89	22.3
CW-066	Dust Wipes	1.00	25	1	3.41	85.3
CW-067	Dust Wipes	1.00	25	1	16.12	403.0
CW-068	Dust Wipes	1.00	25	1	2.38	59.5
CW-069	Dust Wipes	1.00	25	1	0.02	<10
CW-070	Dust Wipes	1.00	25	1	0.23	<10
CW-071	Dust Wipes	1.00	25	1	0.02	<10
CW-072	Dust Wipes	1.00	25	1	0.02	<10
CW-073	Dust Wipes	1.00	25	1	0.02	<10
CW-074	Dust Wipes	1.00	25	1	0.02	<10
CW-075	Dust Wipes	1.00	25	1	1.28	32.0
CW-076	Dust Wipes	1.00	25	1	2.23	55.8
CW-077	Dust Wipes	1.00	25	1	0.02	<10
CW-078	Dust Wipes	1.00	25	1	0.02	<10
CW-079	Dust Wipes	1.00	25	1	0.02	<10
CW-080	Dust Wipes	1.00	25	1	5.63	140.8
CW-081	Dust Wipes	1.00	25	1	0.14	<10
CW-082	Dust Wipes	1.00	25	1	12.85	321.3
CW-083	Dust Wipes	1.00	25	1	13.46	336.5
CW-084	Dust Wipes	1.00	25	1	8.16	204.0
CW-085	Dust Wipes	1.00	25	1	0.15	<10
CW-086	Dust Wipes	1.00	25	1	3.86	96.5
CW-087	Dust Wipes	1.00	25	1	0.38	<10
CW-088	Dust Wipes	1.00	25	1	14.04	351.0
CW-089	Dust Wipes	1.00	25	1	4.30	107.5
CW-090	Dust Wipes	1.00	25	1	16.02	400.5
CW-091	Dust Wipes	1.00	25	1	11.18	279.5
CW-092	Dust Wipes	1.00	25	1	18.97	474.3
CW-093	Dust Wipes	1.00	25	1	0.31	<10
CW-094	Dust Wipes	1.00	25	1	0.32	<10
CW-095	Dust Wipes	1.00	25	1	23.59	589.8
CW-096	Dust Wipes	1.00	30	1	4.25	127.5
CW-097	Dust Wipes	1.00	25	1	0.43	10.8
CW-098	Dust Wipes	1.00	25	1	5.52	138.0
CW-099	Dust Wipes	1.00	25	1	0.32	<10
CW-100	Dust Wipes	1.00	25	1	2.13	53.3
CW-101	Dust Wipes	1.00	25	1	0.71	17.8
CW-102	Dust Wipes	1.00	25	1	11.87	296.8
CW-103	Dust Wipes	1.00	25	1	8.68	214.5
CW-104	Dust Wipes	1.00	25	1	0.58	14.5


Analyst Signature

CW-105	Dust Wipes	1.00	25	1	21.60	540.0
CW-106	Dust Wipes	1.00	25	1	0.02	< 10
CW-107	Dust Wipes	1.00	25	1	0.32	< 10
CW-108	Dust Wipes	1.00	25	1	20.79	519.8
CW-109	Dust Wipes	1.00	25	1	9.15	228.8
CW-110	Dust Wipes	1.00	25	1	0.47	11.8
CW-111	Dust Wipes	1.00	25	1	14.03	350.8
CW-112	Dust Wipes	1.00	25	1	14.36	359.0
CW-113	Dust Wipes	1.00	25	1	11.05	276.3
CW-114	Dust Wipes	1.00	25	1	0.20	< 10
CW-115	Dust Wipes	1.00	25	1	13.05	326.3
CW-116	Dust Wipes	1.00	25	1	6.41	160.3
CW-117	Dust Wipes	1.00	25	1	22.76	569.0
CW-118	Dust Wipes	1.00	25	1	6.95	173.8
CW-119	Dust Wipes	1.00	25	1	0.75	18.8
CW-120	Dust Wipes	1.00	25	1	19.29	482.3
CW-121	Dust Wipes	1.00	25	1	31.22	780.5
CW-122	Dust Wipes	1.00	25	1	0.23	< 10
CW-123	Dust Wipes	1.00	25	1	6.58	164.5
CW-124	Dust Wipes	1.00	25	1	0.80	20.0
CW-125	Dust Wipes	1.00	25	1	7.24	181.0
CW-126	Dust Wipes	1.00	25	1	0.57	14.3
CW-127	Dust Wipes	1.00	25	1	2.07	51.8
CW-128	Dust Wipes	1.00	25	1	0.69	17.3
CW-129	Dust Wipes	1.00	25	1	37.25	931.3
CW-130	Dust Wipes	1.00	25	1	1.23	30.8
CW-131	Dust Wipes	1.00	25	1	3.82	95.5
CW-132	Dust Wipes	1.00	25	1	1.41	35.3
CW-133	Dust Wipes	1.00	25	1	5.49	137.3
CW-134	Dust Wipes	1.00	25	1	1.89	47.3
CW-135	Dust Wipes	1.00	25	1	5.80	145.0
CW-136	Dust Wipes	1.00	25	1	8.93	223.3
CW-137	Dust Wipes	1.00	25	1	8.54	213.5
CW-138	Dust Wipes	1.00	25	1	1.83	45.8
CW-139	Dust Wipes	1.00	25	1	1.49	37.3
CW-140	Dust Wipes	1.00	25	1	0.55	13.8

$\mu\text{g}/\text{ft}^2$ = micrograms per square foot

MDL for Micron Labs = 4.177 $\mu\text{g}/\text{wipe}$


Analyst Signature

Dust/Wipe Sample Log

Micron Labs
Arcadia, California



Company AAA Lead Consultants and Inspections, Inc.

No. of Samples	<u>108</u>	For Lab Use Only
Client Project No.	<u>333 Turnbull Canyon Road</u>	Micron Job No.
Client Project Ref.	<u>ARC</u>	<u>10610016</u>

Sample Data Log 1 of 6

	Date Collected	Client Sample ID	Sample Location	Side	Dimensions
1	<u>1-29-10</u>	<u>CW-034</u>	<u>FLOOR QUAD 5</u>	<u>CC</u>	<u>12x12</u>
2		<u>CW-035</u>	<u>WALL QUAD 5</u>	<u>CC</u>	<u>12x12</u>
3		<u>CW-036</u>	<u>CEILING QUAD 5</u>	<u>CC</u>	<u>12x12</u>
4		<u>CW-037</u>	<u>Light QUAD 5</u>	<u>CC</u>	<u>4x36</u>
5		<u>CW-038</u>	<u>PIPE QUAD 5</u>	<u>CC</u>	<u>6x24</u>
6		<u>CW-039</u>	<u>FLOOR QUAD 5</u>	<u>BC</u>	<u>12x12</u>
7		<u>CW-040</u>	<u>WALL QUAD 5</u>	<u>BL</u>	<u>12x12</u>
8		<u>CW-041</u>	<u>CEILING QUAD 5</u>	<u>BL</u>	<u>12x12</u>
9		<u>CW-042</u>	<u>Light QUAD 5</u>	<u>BC</u>	<u>4x36</u>
10		<u>CW-043</u>	<u>Light QUAD 5</u>	<u>BL</u>	<u>4x36</u>
11		<u>CW-044</u>	<u>FLOOR QUAD 6</u>	<u>CR</u>	<u>12x12</u>
12		<u>CW-045</u>	<u>WALL QUAD 6</u>	<u>CR</u>	<u>12x12</u>
13		<u>CW-046</u>	<u>CEILING QUAD 6</u>	<u>CR</u>	<u>12x12</u>
14		<u>CW-047</u>	<u>Light QUAD 6</u>	<u>CR</u>	<u>4x36</u>
15		<u>CW-048</u>	<u>Light QUAD 6</u>	<u>CL</u>	<u>5x24</u>
16		<u>CW-049</u>	<u>WALL QUAD 6</u>	<u>DR</u>	<u>12x12</u>
17		<u>CW-050</u>	<u>FLOOR QUAD 6</u>	<u>DR</u>	<u>12x12</u>
18		<u>CW-051</u>	<u>CEILING QUAD 6</u>	<u>DR</u>	<u>12x12</u>
19		<u>CW-052</u>	<u>Light QUAD 6</u>	<u>DR</u>	<u>4x36</u>
20		<u>CW-053</u>	<u>Light QUAD 6</u>	<u>AL</u>	<u>4x36</u>

Relinquished by	<u>[Signature]</u>	Date	<u>1/30/10</u>	Time	<u>8:00 AM</u>
Received by	<u>[Signature]</u>	Date	<u>1/30/10</u>	Time	<u>10:00 AM</u>

Dust/Wipe Sample Log

Micron Labs
Arcadia, California



Company AAA Lead Consultants and Inspections, Inc.

No. of Samples	For Lab Use Only
Client Project No.	Micron Job No.
Client Project Ref. ARC	10610016

Sample Data Log 2 of 6

	Date Collected	Client Sample ID	Sample Location	Side	Dimensions
1	1-29-10	CW-054	Wall QUAD 7	BL	12x12
2		CW-055	Floor QUAD 7	BL	12x12
3		CW-056	Ceiling QUAD 7	AR	12x12
4		CW-057	light QUAD 7	AR	5x24
5		CW-058	pipe QUAD 7	AR	6x24
6		CW-059	Wall QUAD 7	AR	12x12
7		CW-060	Floor QUAD 7	CR	12x12
8		CW-061	Ceiling QUAD 7	CR	12x12
9		CW-062	light QUAD 7	CL	4x36
10		CW-063	light QUAD 7	CR	5x24
11		CW-064	Floor QUAD 8	AC	12x12
12		CW-065	Wall QUAD 8	AC	12x12
13		CW-066	Ceiling QUAD 8	AC	12x12
14		CW-067	light QUAD 8	AL	4x36
15		CW-068	light QUAD 8	DH	5x24
16		CW-069	light QUAD 8	DR	5x24
17		CW-070	Floor QUAD 8	DR	12x12
18		CW-071	Wall QUAD 8	DR	12x12
19		CW-072	Ceiling QUAD 8	DR	12x12
20		CW-073	light QUAD 8	CR	4x36

Relinquished by <i>[Signature]</i>	Date 1/30/10 Time 8:00 AM
Received by <i>Nora Garmey</i>	Date 1/20/10 Time 10:20 AM

Dust/Wipe Sample Log

Micron Labs
Arcadia, California



Company AAA Lead Consultants and Inspections, Inc.

No. of Samples _____	For Lab Use Only
Client Project No. _____	Micron Job No. <u>10610006</u>
Client Project Ref. <u>ARC</u>	

Sample Data Log 3 of 6

	Date Collected	Client Sample ID	Sample Location	Side	Dimensions
1	1/29/10	CW-074	Wall Quad 9	C R	12" X 12"
2		CW-075	Floor Quad 9	C R	12" X 12"
3		CW-076	Pipe Quad 9	C R	6" X 24"
4		CW-077	Ceiling Quad 9	C R	12" X 12"
5		CW-078	Light Quad 9	C R	4" X 36"
6		CW-079	Wall Quad 9	B L	12" X 12"
7		CW-080	Floor Quad 9	B L	12" X 12"
8		CW-081	Ceiling Quad 9	B L	12" X 12"
9		CW-082	Light Quad 9	B L	5" X 36"
10		CW-083	Light Quad 9	A B	5" X 24"
11		CW-084	Floor Quad 10	C C	12" X 12"
12		CW-085	Wall Quad 10	C C	12" X 12"
13		CW-086	Light Quad 10	C C	4" X 36"
14		CW-087	Ceiling Quad 10	C C	12" X 12"
15		CW-088	Pipe Quad 10	C C	9" X 37"
16		CW-089	Fire Ext Box Quad 10	A C	12" X 12"
17		CW-090	Light Quad 10	A C	4" X 36"
18		CW-091	Light Quad 10	A L	5" X 24"
19		CW-092	Floor Quad 10	A C	12" X 12"
20		CW-093	Ceiling Quad 10	A C	12" X 12"

Relinquished by <u>[Signature]</u>	Date <u>1/30/10</u> Time <u>8:00 AM</u>
Received by <u>[Signature]</u>	Date <u>1/30/10</u> Time <u>10:00 AM</u>

Dust/Wipe Sample Log

Micron Labs
Arcadia, California



Company AAA Lead Consultants and Inspections, Inc.

No. of Samples	For Lab Use Only
Client Project No.	Micron Job No. <u>10610016</u>
Client Project Ref. <u>ARC</u>	

Sample Data Log 4 of 6

	Date Collected	Client Sample ID	Sample Location	Side	Dimensions
1	1-29-10	CW-094	WALL SWAB 11	BR	12X12
2		CW-095	FLOOR SWAB 11	BR	12X12
3		CW-096	light SWAB 11	BR	5X24
4		CW-097	CEILING SWAB 11	BC	12X12
5		CW-098	light SWAB 11	CR	5X24
6		CW-099	WALL SWAB 11	BL	12X12
7		CW-100	FLOOR SWAB 11	BL	12X12
8		CW-101	CEILING SWAB 11	BL	12X12
9		CW-102	light SWAB 11	AL	5X24
10		CW-103	light SWAB 11	BL	5X24
11		CW-104	WALL SWAB 12	DC	12X12
12		CW-105	FLOOR SWAB 12	D&R	12X12
13		CW-106	Blank RC		
14		CW-107	WALL SWAB 12	DC	12X12
15		CW-108	FLOOR SWAB 12	DR	12X12
16		CW-109	light SWAB 12	BR	5X24
17		CW-110	CEILING SWAB 12	AC	12X12
18		CW-111	light SWAB 12	AR	5X24
19		CW-112	light SWAB 12	DL	5X24
20		CW-113	light SWAB 12	CC	5X24

Relinquished by <u>[Signature]</u>	Date <u>1/30/10</u> Time <u>8:00 AM</u>
Received by <u>[Signature]</u>	Date <u>1/30/10</u> Time <u>10:10 AM</u>

Dust/Wipe Sample Log

Micron Labs
Arcadia, California



Company AAA Lead Consultants and Inspections, Inc.

No. of Samples _____	For Lab Use Only
Client Project No. _____	Micron Job No. <u>10610016</u>
Client Project Ref. <u>ARC</u>	

Sample Data Log 5 of 6

	Date Collected	Client Sample ID	Sample Location	Side	Dimensions
1	1/29/10	CW-114	Ceiling Quad 12	D L	12" X 12"
2		CW-115	Floor Quad 12	C L	12" X 12"
3		CW-116	Floor Quad 11	C R	12" X 12"
4		CW-117	Floor Quad 9	B R	12" X 12"
5		CW-118	Floor Quad 12A	A C	12" X 12"
6		CW-119	Wall Quad 12A	A L	12" X 12"
7		CW-120	Pipe Quad 12A	A R	7" X 36"
8		CW-121	Duct Quad 12A	A C	6" X 16"
9		CW-122	Ceiling Quad 12A	A R	12" X 12"
10		CW-123	Office Duct One	B R	6" X 8"
11		CW-124	Office Duct Two	B L	1" X 18"
12		CW-125	Office Duct Three	C L	3" X 29"
13		CW-126	Office Duct Four	A C	3" X 27"
14		CW-127	Office Duct Five	C C	1 1/2" X 15"
15		CW-128	Compactor Door	A C	6" X 7"
16		CW-129	Compactor Shears	B L	6" X 22"
17		CW-130	Compactor Filter	C C	12" X 12"
18		CW-131	Container 1 Floor	C C	12" X 12"
19		CW-132	Container 1 Ceiling	B C	12" X 12"
20		CW-133	Container 2 Floor	A C	12" X 12"

Relinquished by <u>Mulky</u>	Date <u>1/30/10</u> Time <u>8:00 AM</u>
Received by <u>Nora Ramsey</u>	Date <u>1/30/10</u> Time <u>10:00 AM</u>

Dust/Wipe Sample Log

Micron Labs
Arcadia, California



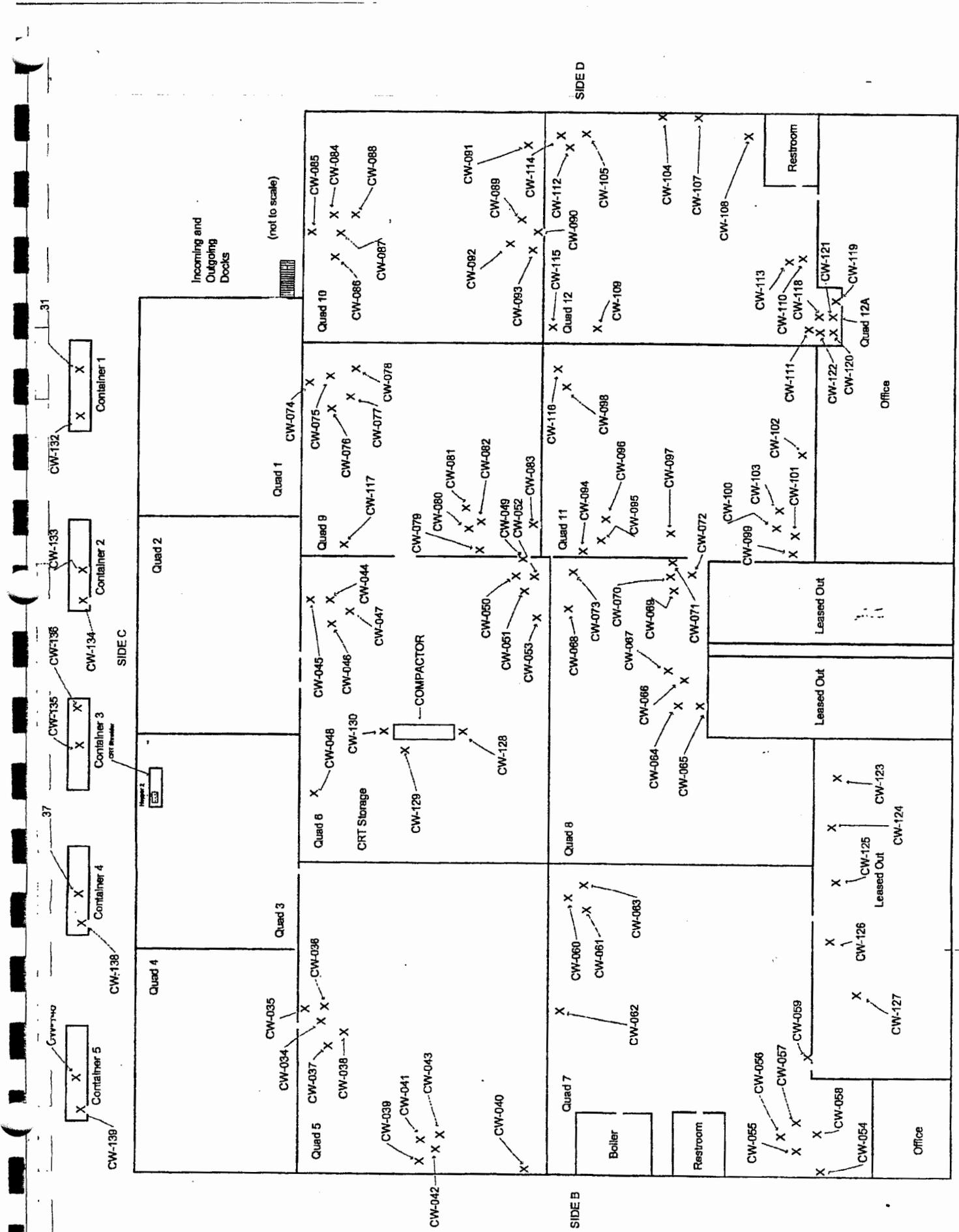
Company AAA Lead Consultants and Inspections, Inc.

No. of Samples	For Lab Use Only
Client Project No.	Micron Job No. <u>10610016</u>
Client Project Ref. <u>ARC</u>	

Sample Data Log 6 of 6

	Date Collected	Client Sample ID	Sample Location	Side	Dimensions	
1	1-29-10	CW-134	Container 2 Ceiling	AR	12x12	
2		CW-135	Container 2 Floor	AL	12x12	
3		CW-136	Container 3 Ceiling	OR	12x12	
4		CW-137	Container 4 Floor	CC	12x12	
5		CW-138	Container 4 Ceiling	AR	12x12	
6		CW-139	Container 5 Floor	AR	12x12	
7		✓	CW-140	Container 5 Ceiling	CC	12x12
8		1/29/10	CW-141	Blank QC		12x12"
9						
10						
11						
12						
13						
14						
15						
16						
17						
18						
19						
20						

Relinquished by <u>[Signature]</u>	Date <u>1/30/10</u> Time <u>8:00 AM</u>
Received by <u>[Signature]</u>	Date <u>1/30/10</u> Time <u>10:00 AM</u>





Micron Environmental Labs

3565 Lexington Av.
El Monte, CA 91731

Analytical Method: EPA SW846-3050-7420
AIHA (ELPAT) ID No.: 103012
CA ELAP Certificate NO. 2297

Date: 2/5/10
Micron Reference No. 10610021

Lead (Pb) In wipes Summary Results

Project: 333 W. Tumbull Canyon Rd.

Analyst: Nick Orozco

Company: AAA Lead Consultants and Inspections, Inc.

Date Collected: 2/3/10

Address: 1307 W. Sixth St. Ste. 134

Date Received: 2/5/10

City, State, Zip: Corona, CA 92882

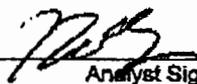
Date Analyzed: 2/5/10

No. of samples: 10

Sample ID	Sample Description	Area Sampled(ft ²)	Vol. (ml)	Dil. Factor	Conc. mg/L	Results µg/ft ²
CW-142	Dust Wipes	1.00	25	1	32.88	817.0
CW-143	Dust Wipes	1.00	25	1	7.66	191.5
CW-144	Dust Wipes	1.00	25	1	26.56	664.0
CW-145	Dust Wipes	1.00	25	1	6.05	151.3
CW-146	Dust Wipes	1.00	25	1	4.79	119.8
CW-147	Dust Wipes	1.00	25	1	5.56	139.0
CW-148	Dust Wipes	1.00	25	1	14.65	366.3
CW-149	Dust Wipes	1.00	25	1	54.63	1365.8
CW-150	Dust Wipes	1.00	25	1	9.17	229.3
CW-151	Dust Wipes	1.00	25	1	0.02	< 10

µg/ft² = micrograms per square foot

MDL for Micron Labs = 4.177 µg/wipe


Analyst Signature

Dust/Wipe Sample Log

Micron Labs
Arcadia, California



Company AAA Lead Consultants and Inspections, Inc.

No. of Samples <u>10</u>	For Lab Use Only
Client Project No. <u>ARC</u>	Micron Job No.
Client Project Ref. <u>333 West Turnbull Canyon Road</u>	<u>10610021</u>

Sample Data Log

	Date Collected	Client Sample ID	Sample Location	Side	Dimensions
1	2/3/10	CW-142	Stairs At Decks	E'W'	12" x 12"
2	2/3/10	CW-143	Parking lot	D'E'	12" x 12"
3	2/3/10	CW-144	Parking lot At Decks	E'W'	12" x 12"
4	2/3/10	CW-145	Parking lot	E'W'	12" x 12"
5	2/3/10	CW-146	Parking lot	E'W'	12" x 12"
6	2/3/10	CW-147	Parking lot	E'W'	12" x 12"
7	2/3/10	CW-148	Parking lot At street	E'W'	12" x 12"
8	2/3/10	CW-149	Floor Quad 4	N'E'	12" x 12"
9	2/3/10	CW-150	Dust hood Out Office	E'W'	2" x 15"
10	2/3/10	CW-151	QC Blank		
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					

Relinquished by <u>[Signature]</u>	Date <u>2/3/10</u>	Time <u>6:00 PM</u>
Received by <u>[Signature]</u>	Date <u>2/3/10</u>	Time <u>9:30 AM</u>

CW-148 X

CW-147 X

CW-144 X

Incoming and
Outgoing
Docks

CW-142 X
(not to scale)

CW-143 X

CW-148 X

SIDE C

Container 3
CRT Monitor

Container 4

Container 5
X CW-145

Container 1

Container 2



SIDE B

SIDE D

SIDE A

333 South Tumbull Canyon Road



Micron Environmental Labs

3565 Lexington Av.
El Monte, CA 91731

Analytical Method: EPA SW846-3050-7420
AIHA (ELPAT) ID No.: 103012
CA ELAP Certificate NO. 2297

Date: 2/16/10
Micron Reference No. 10610026

Lead (Pb) in wipes Summary Results

Project: 333 Turnbull Canyon Rd

Analyst: Nick Orozco

Company: AAA Lead Consultants and Inspections, Inc.

Date Collected: 2/11/10

Address: 1307 W. Sixth St. Ste. 134

Date Received: 2/12/10

City, State, Zip Corona, CA 92882

Date Analyzed: 2/16/10

No. of samples: 18

Sample ID	Sample Description	Area Sampled(ft ²)	Vol. (ml)	DIL. Factor	Conc. mg/L	Results µg/ft ²
CW-152	Dust Wipes	1.00	25	1	0.86	21.5
CW-153	Dust Wipes	1.00	25	1	5.18	129.5
CW-154	Dust Wipes	1.00	25	1	5.95	148.8
CW-155	Dust Wipes	1.00	25	1	6.26	206.5
CW-156	Dust Wipes	1.00	25	1	2.82	70.5
CW-157	Dust Wipes	1.00	25	1	23.83	595.8
CW-158	Dust Wipes	1.00	25	1	3.09	77.3
CW-159	Dust Wipes	1.00	25	1	5.14	128.5
CW-160	Dust Wipes	1.00	25	1	5.41	135.3
CW-161	Dust Wipes	1.81	25	1	0.48	< 10
CW-162	Dust Wipes	0.56	25	1	0.70	31.3
CW-163	Dust Wipes	0.58	25	1	5.55	239.2
CW-164	Dust Wipes	0.83	25	1	9.23	278.0
CW-165	Dust Wipes	0.61	25	1	2.26	92.6
CW-166	Dust Wipes	1.15	25	1	2.07	45.0
CW-167	Dust Wipes	0.58	25	1	10.65	459.1
CW-168	Dust Wipes	1.00	25	1	9.90	247.5
CW-169	Dust Wipes	1.00	25	1	0.02	< 10

µg/ft² = micrograms per square foot

MDL for Micron Labs = 4.177 µg/wipe

Analyst Signature

Dust/Wipe Sample Log

Micron Labs
Arcadia, California



Company AAA Lead Consultants and Inspections, Inc.

No. of Samples 18

Client Project No. ARC

Client Project Ref. 333 Turnbull Canyon Road

For Lab Use Only

Micron Job No.

1066025

Sample Data Log

	Data Collected	Client Sample ID	Sample Location	Side	Dimensions
1	2/11/10	CW-152	Parking Lot	"D" R	12" X 12"
2	2/11/10	CW-153	Stairs at Deck	"C" L	12" X 12"
3	2/11/10	CW-154	Quad 4 Floor	"A" C	12" X 12"
4	2/11/10	CW-155	Quad 7 Floor	"C" R	12" X 12"
5	2/11/10	CW-156	Quad 6 Floor	"D" R	12" X 12"
6	2/11/10	CW-157	Quad 9 Floor	"B" R	12" X 12"
7	2/11/10	CW-158	Quad 11 Floor	"B" R	12" X 12"
8	2/11/10	CW-159	Quad 12 A Floor	"B" R	12" X 12"
9	2/11/10	CW-160	Quad 12 Floor	"D" L	12" X 12"
10	2/11/10	CW-161	Quad 12 A Vent	"A" E	6" X 40"
11	2/11/10	CW-162	Quad 12 A Pipe	"A" S	3" X 23"
12	2/11/10	CW-163	Quad 5 Light	"B" H	3" X 24"
13	2/11/10	CW-164	Quad 7 Light	"A" B	5" X 24"
14	2/11/10	CW-165	Quad 7 Pipe	"A" B	4" X 22"
15	2/11/10	CW-166	Quad 7 Light	"C" B	5" X 33"
16	2/11/10	CW-167	Quad 7 Light	"C" R	3" X 24"
17	2/11/10	CW-168	Quad 10 Floor	"A" C	12" X 12"
18	2/11/10	CW-169	Blank OG		12" X 12"
19					
20					

Relinquished by

Received by

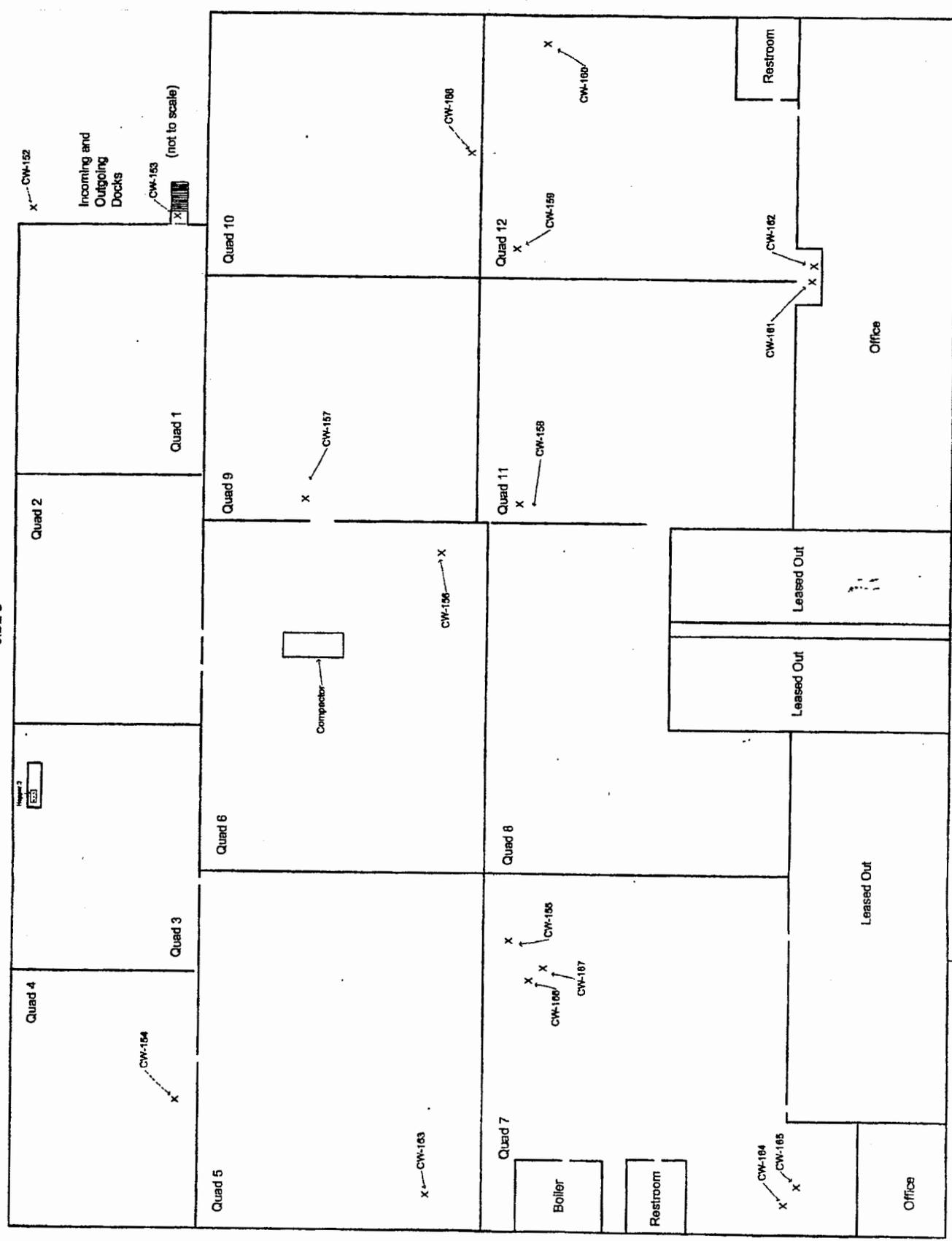
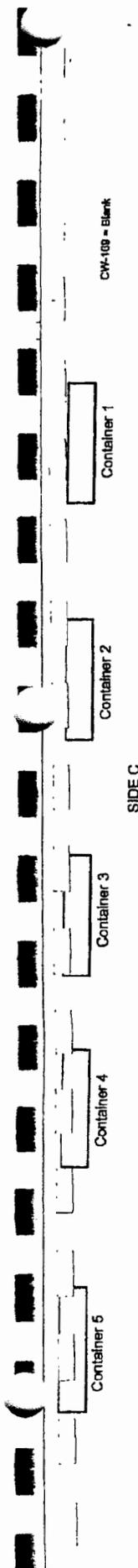
[Handwritten Signature]

Date 2/11/10

Time

Date 2/12/10

Time 1:40 PM



333 South Tumbull Canyon Road

Site A



Micron Environmental Labs

3565 Lexington Av.
El Monte, CA 91731

Analytical Method: EPA SW846-3050-7420
AIHA (ELPAT) ID No.: 103012
CA ELAP Certificate NO. 2297

Date: 2/19/10

Micron Reference No. 10610031

Lead (Pb) in wipes Summary Results

Project: 333 Turnbull Canyon Rd

Analyst: Nick Orozco

Company: AAA Lead Consultants and Inspections, Inc.

Date Collected: 2/19/10

Date Received: 2/19/10

Address: 1307 W. Sixth St. Ste. 134

Date Analyzed: 2/19/10

City, State, Zip: Corona, CA 92882

No. of samples: 3

Sample ID	Sample Description	Area Sampled(ft ²)	Vol. (ml)	Dil. Factor	Conc. mg/L	Results µg/ft ²
CW-170	Dust Wipes	1.00	25	1	2.48	62.0
CW-171	Dust Wipes	0.58	25	1	1.25	53.9
CW-173	Blank	1.00	25	1	0.02	< 10

µg/ft² = micrograms per square foot

MDL for Micron Labs = 4.177 µg/wipe

Analyst Signature

Dust/Wipe Sample Log

Micron Labs
Arcadia, California



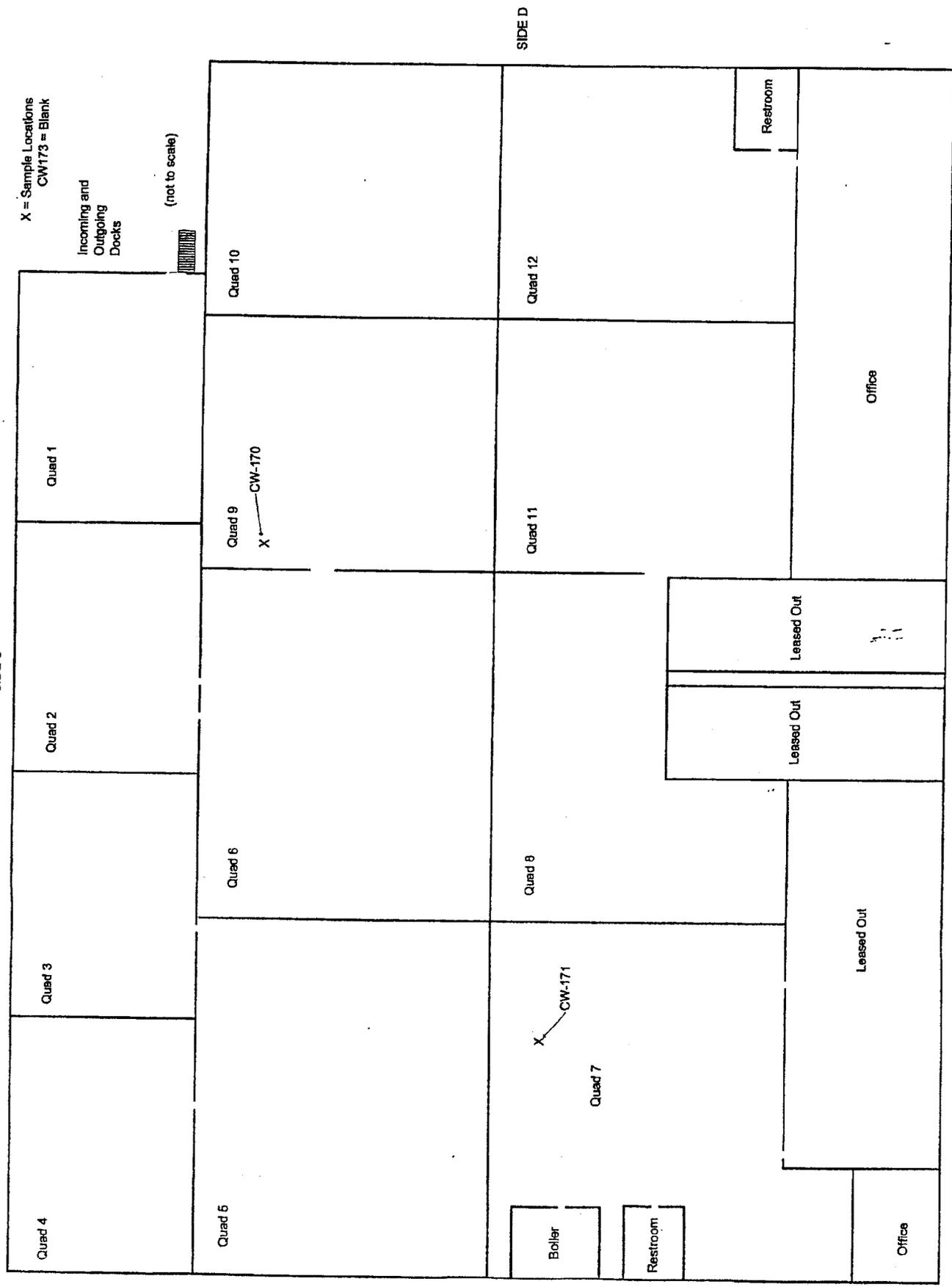
Company AAA Lead Consultants and Inspections, Inc.

No. of Samples <u>3</u>	For Lab Use Only
Client Project No. <u>ARC</u>	Micron Job No. <u>10610031</u>
Client Project Ref. <u>333 Turnbull Canyon Road</u>	

Sample Data Log

	Date Collected	Client Sample ID	Sample Location	Side	Dimensions
1	2/19/10	CW-170	Quad 9 Floor	B R	12" x 12"
2	2/19/10	CW-171	Quad 7 Light	C B	3 1/2" x 24"
3	2/19/10	CW-173	Blank GC		12" x 12"
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					

Relinquished by <u>[Signature]</u>	Date <u>2/19/10</u> Time _____
Received by <u>[Signature]</u>	Date <u>2/19/10</u> Time <u>8:45 am</u>



333 South Turnbull Canyon Road

SIDE A

State of California Department of Public Health

Lead-Related Construction Certificate

<u>Certificate Type</u>	<u>Expiration Date</u>
Inspector/Assessor	05/27/2010
Supervisor	05/27/2010
Project Designer	05/27/2010
Project Monitor	05/27/2010



Michael P. Cohn

ID: 437

APPENDIX G
LEAD PAINT INSPECTION REPORT



AAA LEAD Consultants and Inspections, Inc.

Consulting - Inspections - Risk Assessment - Project Monitoring
STATE CERTIFIED / INSURED

LEAD PAINT INSPECTION REPORT

FOR

JC Environmental Company, Inc.

performed at

ARC

333 South Turnbull Canyon Road
Hacienda Heights, Ca 91745

LEAD PAINT INSPECTION REPORT

REPORT NUMBER: S#01719 - 012910 13:20

INSPECTION FOR: JC Environmental Company, Inc.
2504 Transportation Avenue, Suite C
National City, Ca 91950

PERFORMED AT: ARC
333 South Turnbull Canyon Road
Hacienda Heights, Ca 91745

INSPECTION DATE: January 29, 2010

INSTRUMENT TYPE: RMD
MODEL LPA-1
XRF TYPE ANALYZER
SERIAL # 1719

ACTION LEVEL: 1.0mg/cm²

OPERATORS LICENSE: 6212-33

SIGNED  DATE February 13, 2010
Michael P. Cohn
INSPECTOR I-437

This inspection was conducted in conformance with HUD Guidelines as published in 1997. AAA Lead Consultants and Inspections, Inc. utilized state-of-art practices and techniques in accordance with regulatory standards while performing this inspection. AAA Lead Consultants and Inspections, Inc. evaluation of the relative risk of exposure to lead identified during this inspection is based on conditions observed at the time inspection. AAA Lead Consultants and Inspections, Inc. cannot be responsible for changing conditions that may alter the relative exposure risk or for changes in accepted methodology.

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- 1.0 Introduction
- 2.0 Scope of Work
- 3.0 Property Description
- 4.0 Inspectors Qualifications
- 5.0 Method of Testing
- 6.0 Testing Protocol
- 7.0 Summary of Results
- 8.0 Recommendations
- 9.0 Site Specific Observations
- 10.0 Inspection Limitations
- How to Read Your Report Tables

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- Distribution Report
- Summary Report
- Detailed Report

TAB 3

- Site Footprints

TAB 4

- Photo's of Components Which Contain Lead

TAB 5

- Inspectors Certifications

LEAD BASED PAINT INSPECTION REPORT
ARC
333 SOUTH TURNBULL CANYON ROAD
HACIENDA HEIGHTS, CA 91745

1.0 INTRODUCTION

This report presents the results of AAA LEAD Consultants and Inspections, Inc. lead-based paint inspection of the painted components at ARC, 333 S Turnbull Canyon Road, Hacienda Heights, California (Subject Property) that were suspected to be painted with lead based paint. AAA LEAD Consultants and Inspections, Inc. performed the inspection on January 29, 2010 to determine if painted components with high lead readings from previously taken wipe samples were painted with lead based paint. This document is prepared for the sole use of JC Environmental Company, Inc. and any regulatory agencies that are directly involved in this project. No other party should rely on the information contained herein without prior written consent of JC Environmental Company, Inc. The scope of services, inspection methodology and results are presented below.

2.0 SCOPE OF WORK

On January 29, 2010 AAA LEAD Consultants and Inspections, Inc. performed an inspection for lead at the subject property in Hacienda Heights, California. The intent was to ascertain the presence of lead on painted components, which previous wipe sample results indicated possible contamination from the paint rather than the surface dust. If lead was found, the inspection would identify individual structural components and their respective concentrations of lead in such a manner that this report could be used for subsequent abatement activity.

3.0 PROPERTY DESCRIPTION

The test site is a large concrete tilt up warehouse with offices, restrooms and three large warehouse areas. Testing was performed inside and outside of the warehouse on various components that were suspected to contain lead based paint.

4.0 INSPECTOR'S QUALIFICATIONS

Mr. Michael Cohn of AAA LEAD Consultants and Inspections, Inc. performed the inspection at the site using an RMD XRF spectrum analyzer instrument. Mr. Cohn has attended the radiation safety course for operation and handling of the RMD instrument, and completed an EPA sponsored curriculum at the University Extension Services at University of California, San Diego, in Lead Inspector, Lead Abatement for Contractors and Supervisors and Risk Assessor Training. Mr. Cohn is a State Certified Inspector for Lead Inspections, Project Monitoring, Project Design and Project Supervision.

5.0 METHOD OF TESTING

The testing method employed was x-ray fluorescence (XRF) using a Radiation Monitoring Device Paint Analyzer. The instrument was calibrated to the manufacturer's specifications and was also periodically verified against known lead samples produced by the National Institute of Standards and Testing (NIST). The duration for each test result is determined by a combination of the actual reading relative to the designated action level, the age of the radioactive source, and the substrate on which the test was taken. Substrate corrections (SEL) were not required in compliance with the HUD guidelines for spectrum analyzers. Together these quality control procedures produce a 95% confidence level that the corrected lead concentration (CLC) accurately reflects the actual level of lead in the tested surfaces.

6.0 TESTING PROTOCOL

Testing was conducted in compliance with the HUD Guidelines for scattered site housing as published in 1997. The HUD action level for lead based paint is 1.0 mg/cm², but the Los Angeles County Department of Health Services has established an action level of 0.7mg/cm² (LACC Title 11, Chapter 11.28.010, Section C) For this report the more stringent 0.7mg/cm² is the action level. None of the components tested "inconclusive" which is the statistical range of uncertainty around the action level. HUD has published guidelines that address test results in the inconclusive range. The inconclusive range in this report (0.5 –0.9mg/cm²) was developed to acknowledge the limits of detection for XRF technology.

7.0 SUMMARY OF RESULTS

A summary table with the results of this site has been provided in the "tables" section of this report. Below is a brief description of the components that tested at or above the LA County action level of 0.7mg/cm² and their respective locations.

Quad 2

Pipes on Floor	Inside Pipes on Floor	Inside Kettle	Outside Kettle
Hopper 1 Left	Hopper 1 Exterior	Hopper 1 Interior	Hopper 1 Interior Door

Quad 6

Compactor Shear	Compactor Shear Teeth	Yellow-Piston	Compactor Shear Guard
-----------------	-----------------------	---------------	-----------------------

Parking Lot

Container 1

Shaker	Inside Hopper Crusher	Hopper Door	Hood
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Container 2

Exterior of Hopper	Hopper Inside Door	Hopper Outside Door
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Container 3

Exterior of Hopper	Interior of Hopper
--------------------	--------------------

8.0 RECOMMENDATIONS

It is our recommendation that all components that tested positive for the presence of lead above the HUD action level and any similar untested components be considered lead-laden. Any maintenance or repair activities on these components should be performed in an abatement/containment environment as required by Cal/OSHA Construction and Safety Orders, Lead Section 1532.1.

Any component that is below the HUD action level but still contains lead requires personal exposure level (PEL) testing be performed to determine the workers skill or certification required to perform the activity.

9.0 SITE SPECIFIC OBSERVATIONS

Several of the painted components contain lead based paint. Most components show normal wear and tear. Due to the type of equipment and paint used, these components will always have a potential for lead exposure.

10.0 INSPECTION LIMITATIONS

AAA LEAD Consultants and Inspections, Inc. planned, developed and implemented this inspection based on AAA LEAD Consultants and Inspections, Inc. previous experience in performing lead-based paint inspections. This inspection was conducted in conformance with HUD Guidelines as published in 1997. AAA LEAD Consultants and Inspections, Inc. utilized state-of-the-art practices and techniques in accordance with regulatory standards while performing this inspection. A copy of personnel certifications has been provided for your review. AAA LEAD Consultants and Inspections, Inc. evaluation of the relative risk of exposure to lead identified during this inspection is based on conditions observed at the time of the inspection. AAA LEAD Consultants and Inspections, Inc. cannot be responsible for changing conditions that may alter the relative exposure risk or for future changes in accepted methodology.

HOW TO READ YOUR REPORT TABLES

Depending upon our findings there are several different tables that can be used to generate an accounting of the final results. These tables use two different formats.

The first table is the Distribution Report. This report is an accounting of all components that were tested with correlating results of how many of each component tested positive, negative or inconclusive. In cases of over 1,000 readings it is necessary to divide the report into two sections. When this happens we provide a Project Distribution report combining the Distribution Reports from both report sections with grand total figures.

The second format is found in the rest of our "tables". The following is a brief summary of what each heading in the table means.

Reading No.

Each test is assigned a reading number.

Room No.

Each room has its own identifying number.

Room Name

Along with its own number is a description of the room. (office, hall, bath, etc)

Wall

A letter, either A, B, C identifies each wall, or D. There is a site map towards the end of the report that identifies each location.

Structure

This is the actual name of the component being tested. (wall, window, door, etc)

Location

The area tested on the component. (U lft is upper left, L Ctr is lower center, etc)

Member

The portion of the component tested. If the component is a door, the member could be the casing or the jamb.

Paint Condition

I = Intact, F = Fair and P = Poor

Substrate

This is what the component is made of. (wood, metal, gypsum, plaster etc..)

Color

Though seldom used if a component contains more than one color but only one of the colors tests positive, the positive color will be identified.

Lead (mg/cm²)

This is the lead content of the component tested.

Mode

The equipment can be operated in three modes Std (standard), QM (Quick Mode) or TC (Time Corrected). Std is used to acquire a measurement for a fixed amount of time. QM is the mode used to test components throughout a site. TC mode is used to calibrate the equipment against a known lead source based on a predetermined amount of time. The equipment will only produce an answer after it has reached a 95% confidence level the reading is correct. The time can vary from 2 to 60 seconds.

DISTRIBUTION REPORT OF LEAD PAINT INSPECTION FOR: Advanced Chemical Transport

Inspection Date:	01/29/10	ARC
Report Date:	2/13/2010	333 West Turnbull Canyon Road
Abatement Level:	0.7	City of Industry, Ca
Report No.	01/29/10 13:20	
Total Reading Sets:	35	
Job Started:	01/29/10 13:20	
Job Finished:	01/29/10 14:15	

Structure	Total	Structure Distribution		
		Positive	Negative	Inconclusive
Compactor	11	4 <36%>	7 <64%>	0 <0%>
Crusher	2	1 <50%>	1 <50%>	0 <0%>
Hood	2	1 <50%>	1 <50%>	0 <0%>
Hopper	11	10 <91%>	1 <9%>	0 <0%>
Kettle	2	2 <100%>	0 <0%>	0 <0%>
Pipe	5	2 <40%>	3 <60%>	0 <0%>
Shaker	2	1 <50%>	1 <50%>	0 <0%>
Inspection Totals:	35	21 < 60%>	14 < 40%>	0 < 0%>

SUMMARY REPORT OF LEAD PAINT INSPECTION FOR: Advanced Chemical Transport

Inspection Date: 01/29/10
 Report Date: 2/13/2010
 Abatement Level: 0.7
 Report No. 01/29/10 13:20
 Total Readings: 47 Actionable: 21
 Job Started: 01/29/10 13:20
 Job Finished: 01/29/10 14:15

ARC
 333 West Turnbull Canyon Road
 City of Industry, Ca

Reading No.	Wall	Structure	Location	Member	Paint Cond	Substrate	Color	Lead (mg/cm ²)	Mode
Interior Room 001 Quad 2									
007	C	Pipe		Ctr	I	N/A	N/A	3.4	QM
		In Quad 2							
008	C	Pipe		Ctr	I	N/A	N/A	1.0	QM
		Inside Pipe Quad 2							
010	C	Kettle		Ctr	I	N/A	N/A	1.0	QM
		Inside Kettle Quad 2							
011	C	Kettle		Ctr	I	N/A	N/A	1.0	QM
		Outside Kettle Quad 2							
012	C	Hopper		Ctr	I	N/A	N/A	2.1	QM
		Hopper 1 Left Quad 2							
013	C	Hopper		Ctr	I	N/A	N/A	2.9	QM
		Hopper 1 Exterior Quad 2							
014	C	Hopper		Ctr	I	N/A	N/A	2.8	QM
		Inside Hopper 1 Right Quad 2							
015	C	Hopper		Ctr	I	N/A	N/A	1.0	QM
		Inside Hopper 1 Door Quad 2							
Interior Room 002 Quad 6									
018	B	Compactor		Lft	I	N/A	Yellow	2.0	QM
		Shear							
023	B	Compactor		Lft	I	N/A	Yellow	2.3	QM
		Shear Teeth							
026	B	Compactor		Lft	I	N/A	Yellow	1.0	QM
		Gaurd for Shear							
016	C	Compactor		Ctr	I	N/A	Yellow	3.6	QM
		Yellow Piston							
Interior Room 003 Container 1									
032	A	Shaker		Ctr	I	N/A	N/A	1.0	QM
034	C	Crusher		Ctr	I	N/A	N/A	1.0	QM
		Inside Hopper Crusher							
029	C	Hood		Rgt	I	N/A	Green	1.0	QM
035	C	Hopper		Rgt	I	N/A	N/A	2.2	QM
		Hopper Door							
Interior Room 004 Container 2									
036	C	Hopper		Ctr	I	N/A	N/A	2.8	QM
		Exterior of Hopper							
038	C	Hopper		Ctr	I	N/A	N/A	2.2	QM
		Inside Door							
039	C	Hopper		Ctr	I	N/A	N/A	2.9	QM
		Outside Door							
Interior Room 005 Container 3									
040	C	Hopper		Ctr	I	N/A	N/A	1.0	QM
		Exterior of Hopper							
041	C	Hopper		Ctr	I	N/A	N/A	1.0	QM
		Interior of Hopper							

SUMMARY REPORT OF LEAD PAINT INSPECTION FOR: Advanced Chemical Transport

Reading No.	Wall	Structure	Location	Member	Paint Cond	Substrate	Color	Lead (mg/cm ²)	Mode
-------------	------	-----------	----------	--------	------------	-----------	-------	----------------------------	------

Calibration Readings

---- End of Readings ----

DETAILED REPORT OF LEAD PAINT INSPECTION FOR: Advanced Chemical Transport

Inspection Date: 01/29/10
 Report Date: 2/13/2010
 Abatement Level: 0.7
 Report No. 01/29/10 13:20
 Total Readings: 47
 Job Started: 01/29/10 13:20
 Job Finished: 01/29/10 14:15

ARC
 333 West Tumbull Canyon Road
 City of Industry, Ca

Reading No.	Wall	Structure	Location	Member	Paint Cond	Substrate	Color	Lead (mg/cm ²)	Mode
Interior Room 001 Quad 2									
007	C	Pipe	Ctr		I	N/A	N/A	3.4	QM
		In Quad 2							
008	C	Pipe	Ctr		I	N/A	N/A	1.0	QM
		Inside Pipe Quad 2							
009	C	Pipe	Ctr		I	N/A	N/A	0.0	QM
		Inside Pipe Quad 2							
010	C	Kettle	Ctr		I	N/A	N/A	1.0	QM
		Inside Kettle Quad 2							
011	C	Kettle	Ctr		I	N/A	N/A	1.0	QM
		Outside Kettle Quad 2							
012	C	Hopper	Ctr		I	N/A	N/A	2.1	QM
		Hopper 1 Left Quad 2							
013	C	Hopper	Ctr		I	N/A	N/A	2.9	QM
		Hopper 1 Exterior Quad 2							
014	C	Hopper	Ctr		I	N/A	N/A	2.8	QM
		Inside Hopper 1 Right Quad 2							
015	C	Hopper	Ctr		I	N/A	N/A	1.0	QM
		Inside Hopper 1 Door Quad 2							
Interior Room 002 Quad 6									
017	A	Compactor	Ctr		I	N/A	N/A	-0.1	QM
		Compactor Door							
018	B	Compactor	Lft		I	N/A	Yellow	2.0	QM
		Shear							
023	B	Compactor	Lft		I	N/A	Yellow	2.3	QM
		Shear Teeth							
024	B	Compactor	Lft		I	N/A	N/A	0.2	QM
		Filter							
026	B	Compactor	Lft		I	N/A	Yellow	1.0	QM
		Gaurd for Shear							
019	B	Compactor	Ctr		I	N/A	Blue	-0.1	QM
		Side							
022	B	Compactor	Ctr		I	N/A	Yellow	0.0	QM
		Piston							
021	B	Compactor	Rgt		I	N/A	Blue	0.0	QM
		Side							
016	C	Compactor	Ctr		I	N/A	Yellow	3.6	QM
		Yellow Piston							
025	C	Compactor	Rgt		I	N/A	Blue	-0.1	QM
		Side							
020	D	Compactor	Rgt		I	N/A	Blue	0.0	QM
		Side							
Interior Room 003 Container 1									
032	A	Shaker	Ctr		I	N/A	N/A	1.0	QM
027	A	Pipe	Rgt		I	N/A	N/A	-0.1	QM
028	A	Pipe	Rgt		I	N/A	N/A	0.3	QM
		Interior							
031	A	Shaker	Rgt		I	N/A	N/A	-0.1	QM

DETAILED REPORT OF LEAD PAINT INSPECTION FOR: Advanced Chemical Transport

Reading No.	Wall	Structure	Location	Member	Paint Cond	Substrate	Color	Lead (mg/cm ²)	Mode
033	C	Crusher Hopper Crusher	Ctr		I	N/A	N/A	0.2	QM
034	C	Crusher Inside Hopper Crusher	Ctr		I	N/A	N/A	1.0	QM
029	C	Hood	Rgt		I	N/A	Green	1.0	QM
030	C	Hood Interior of Green Hood	Rgt		I	N/A	Orange	-0.1	QM
035	C	Hopper Hopper Door	Rgt		I	N/A	N/A	2.2	QM
Interior Room 004 Container 2									
036	C	Hopper Exterior of Hopper	Ctr		I	N/A	N/A	2.8	QM
037	C	Hopper Inside Hopper	Ctr		I	N/A	N/A	0.1	QM
038	C	Hopper Inside Door	Ctr		I	N/A	N/A	2.2	QM
039	C	Hopper Outside Door	Ctr		I	N/A	N/A	2.9	QM
Interior Room 005 Container 3									
040	C	Hopper Exterior of Hopper	Ctr		I	N/A	N/A	1.0	QM
041	C	Hopper Interior of Hopper	Ctr		I	N/A	N/A	1.0	QM
Calibration Readings									
001								0.9	TC
002								1.0	TC
003								1.0	TC
004								0.0	TC
005								0.0	TC
006								0.1	TC
042								1.0	TC
043								0.9	TC
044								0.9	TC
045								0.0	TC
046								0.0	TC
047								0.0	TC

----- End of Readings -----





Container 5

Container 4

Container 3

Container 2

Container 1

SIDE C

Quad 4

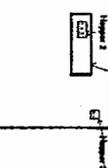
Quad 3

Quad 2

Quad 1

Incoming and Outgoing Docks

(not to scale)



Quad 5

Quad 6

Quad 9

Quad 10

Boiler

Restroom

CRT Storage

Compador

GPU / Misc Dismantling

E-Waste Storage

SIDE B

Quad 7

Quad 8

Quad 11

Quad 12

SIDE D

Office

Leased Out

Leased Out

Leased Out

Office

Restroom

SIDE A

333 South Turbulent Canyon Road

PHOTOS OF COMPONENTS WHICH CONTAIN LEAD
AT ARC, 333 SOUTH TURNBULL CANYON ROAD, CA



PHOTO # 1
Pipes in Quad 2



PHOTO # 2
Inside of Pipe

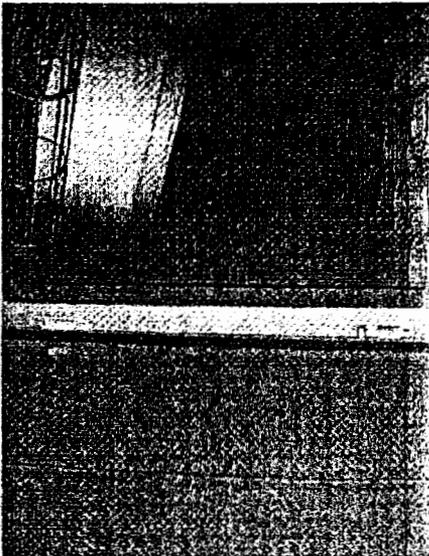


PHOTO # 3
Interior Hopper 1

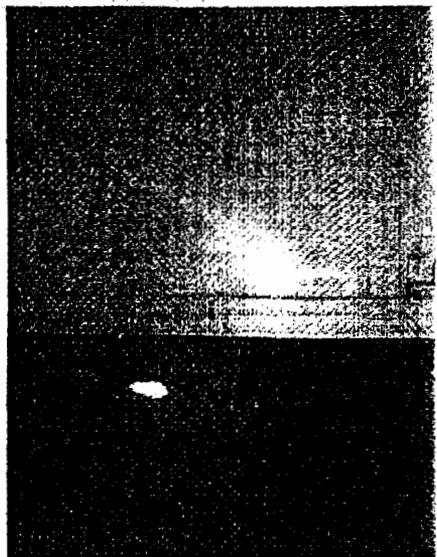


PHOTO # 4
Exterior Hopper Door



PHOTO # 5
Inside Hopper 1 Left

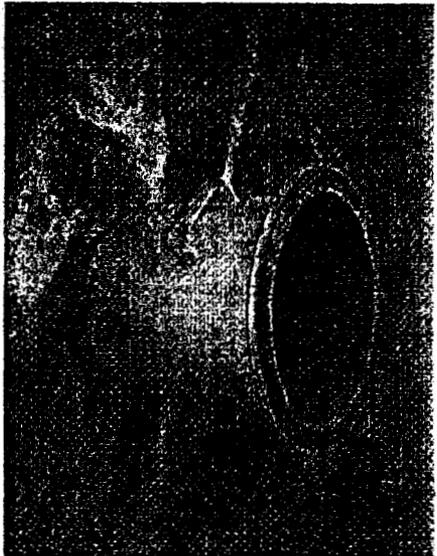


PHOTO # 6
Kettle

AAA Lead Consultants and Inspections, Inc.

1307 West Sixth Street #134, Corona, Ca
<http://www.pclnet.com/lead/>

Phone (909) 582-9071

Fax (909) 582-9073

PHOTOS OF COMPONENTS WHICH CONTAIN LEAD
 AT ARC, 333 SOUTH TURNBULL CANYON ROAD, CA



PHOTO # 7
 Inside Kettle

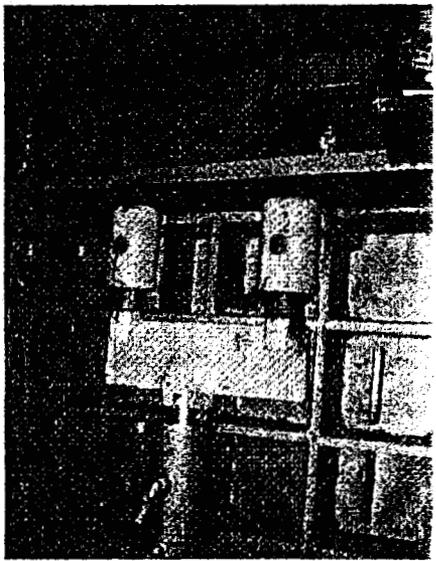


PHOTO # 8
 Compactor Yellow Piston

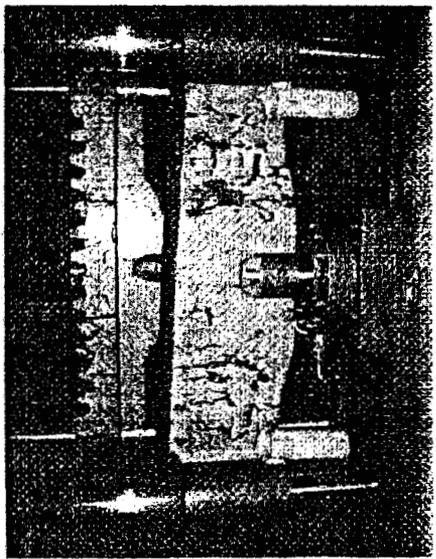


PHOTO # 9
 Compactor Shear and Teeth

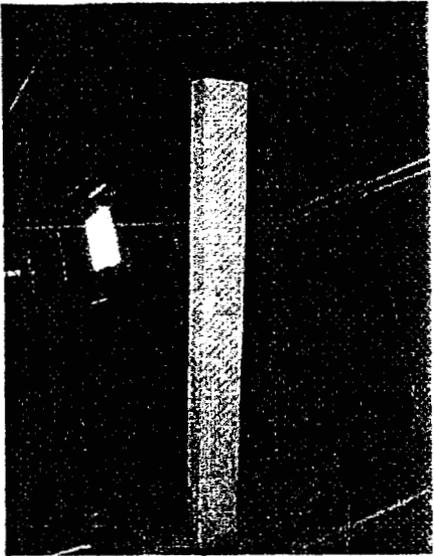


PHOTO # 10
 Compactor Guard for Shear

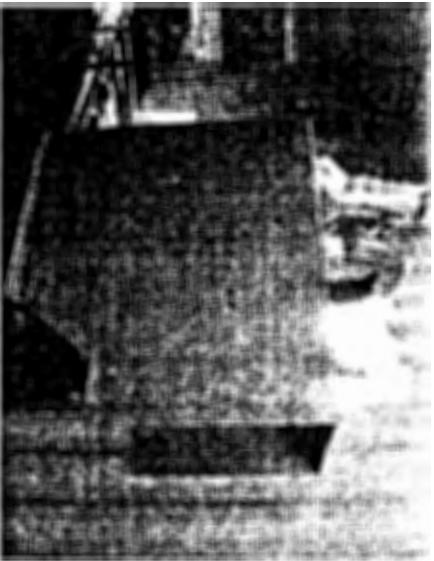


PHOTO # 11
 Hood in Container 1

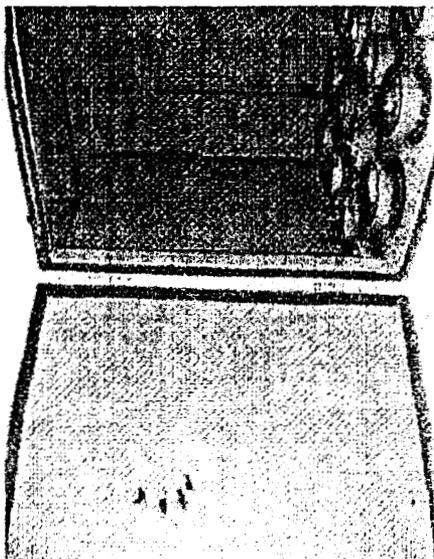


PHOTO # 12
 Interior Hopper and Hopper Door

AAA Lead Consultants and Inspections, Inc.

1307 West Sixth Street #134, Corona, Ca

Phone (909) 582-9071

Fax (909) 582-9073

<http://www.lead-consultants.com>

**PHOTOS OF COMPONENTS WHICH CONTAIN LEAD
AT ARC, 333 SOUTH TURNBULL CANYON ROAD, CA**

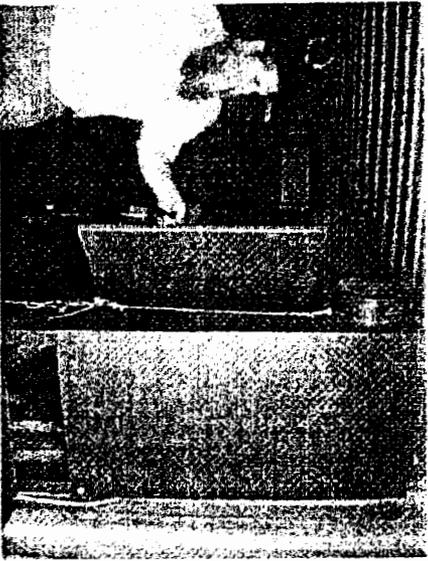


PHOTO # 13
Hopper



PHOTO # 14
Exterior Hopper 1 Left

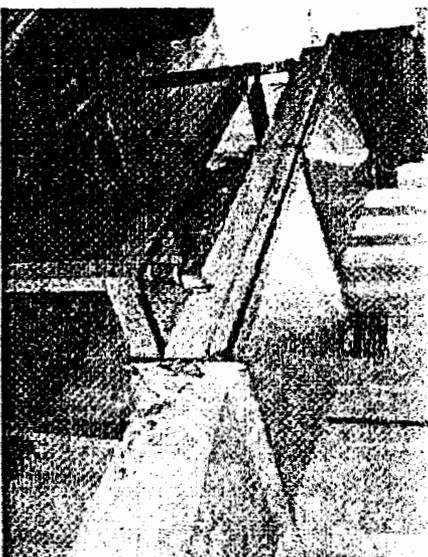


PHOTO # 15
Shaker

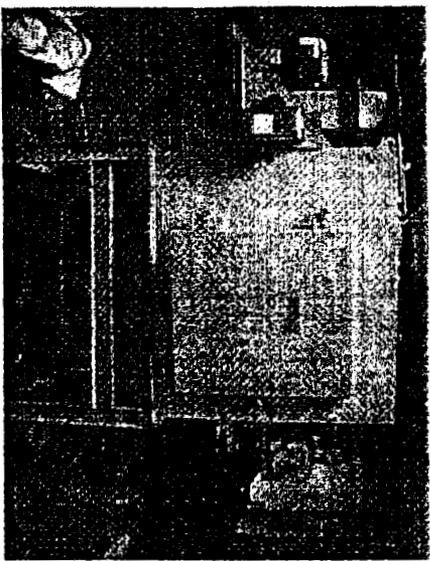


PHOTO # 16
Exterior Hopper & Door

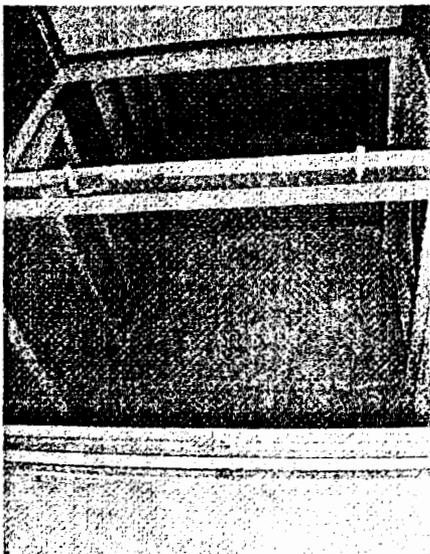


PHOTO # 17
Inside Hopper

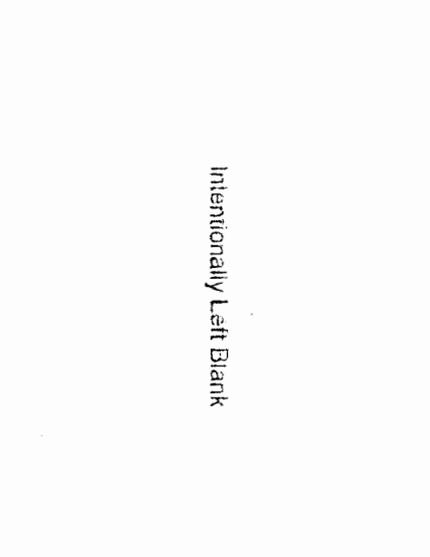


PHOTO # 18

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AAA Lead Consultants and Inspections, Inc.

1307 West Sixth Street #134, Corona, Ca

Home (909) 582-4071

Fax (909) 582-4073

<http://www.aaalead.com>



Certificate of Achievement

This is to certify that

Michael Cohn

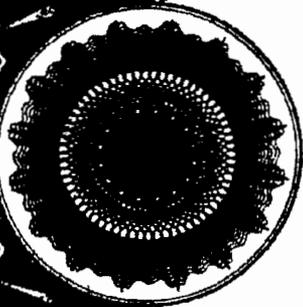
of AAA Lead Consultants & Inspections

on the 3rd day of October 1994 successfully completed the factory training for

RMD's LPA-1 Lead Paint Inspection System

including, but not limited to, the topics of Radiation Safety
and the Proper Use of the Instrument.

Jacob Paster
Jacob Paster, Vice-President of RMD
44 Hunt St., Watertown, Massachusetts



State of California Department of Public Health

Lead-Related

Certificate

Expiration

Construction

Type

Date

Certificate



Inspector/Assessor

05/27/2010

Supervisor

05/27/2010

Project Designer

05/27/2010

Project Monitor

05/27/2010



Michael P. Cohn

437



APPENDIX H
PHOTOLOG

Photograph 1

Description: View of the subject property loading docks on the northwest corner of the building prior to the start of the clean up.

View: Southwest



Photograph 2

Description: Typical view of equipment and conex containers used as crushers situated on the northwest wide of the building prior to the start of the clean up.

View: Northeast



Photograph 3

Description: Typical view of the materials staged outside the building prior to the start of the clean up.

View: Northeast



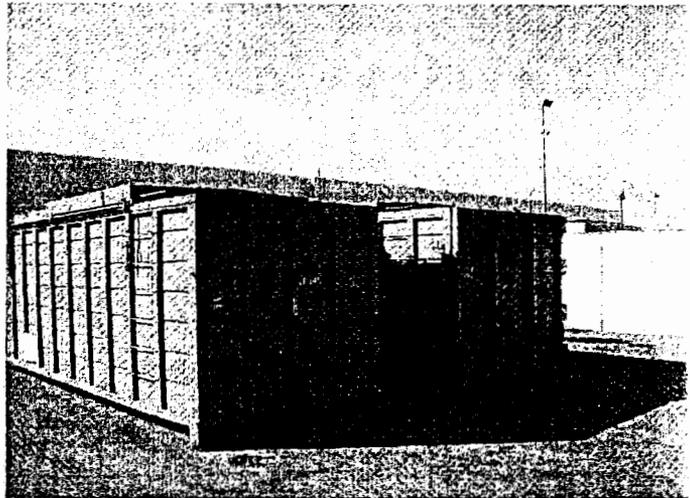
**Zions First National Bank
Lead Cleanup and Residual Substance
Removal Final Report**

**ARC International
333 Turnbull Canyon Road
Industry, California 91745**

Photograph 4

Description: View of the roll off containers of regulated wastes left by the previous owner prior to the start of the clean up.

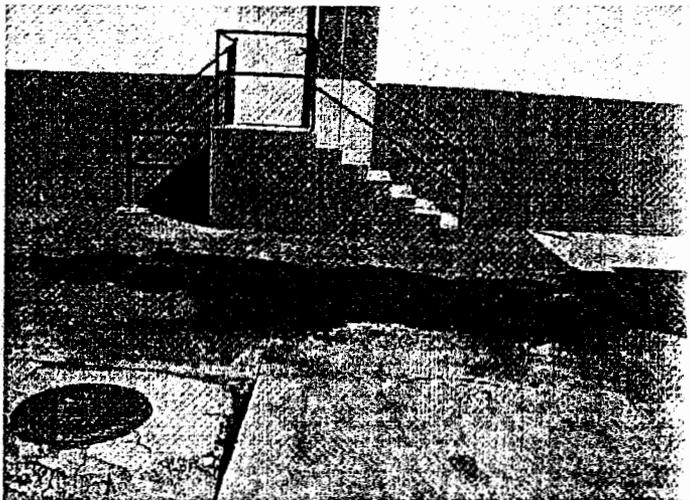
View: West



Photograph 5

Description: View of an oil stain located on the south end of the northwest elevation of the building prior to the start of the clean up.

View: Southeast



Photograph 6

Description: View of some of the equipment left outside the warehouse prior to the start of the clean up.

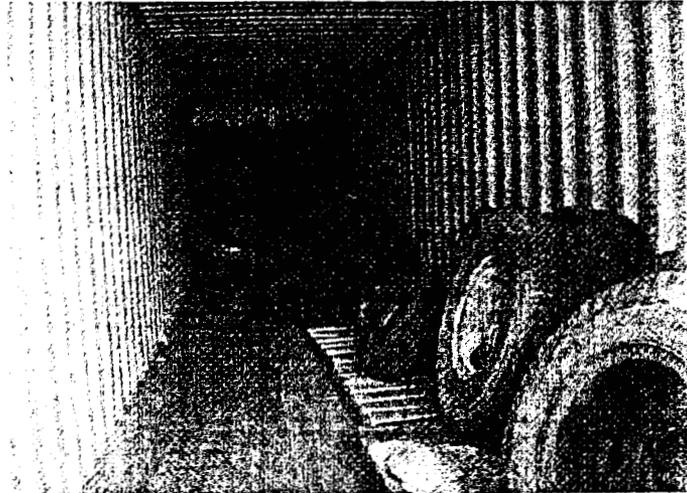
View: Interior



Photograph 7

Description: View of some of the used tire left by the former occupant.

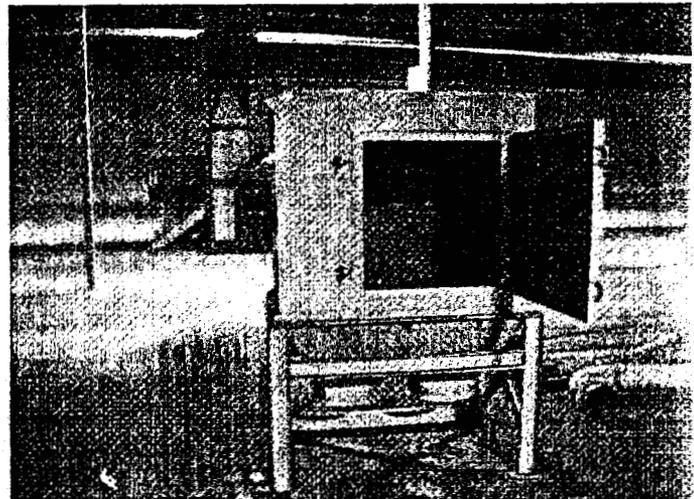
View: Interior



Photograph 8

Description: View of some of the equipment left inside the warehouse prior to the start of the clean up.

View: Interior



Photograph 9

Description: Typical view of the interior of the warehouse prior to start of the clean up.

View: Interior



**Zions First National Bank
Lead Cleanup and Residual Substance
Removal Final Report**

**ARC International
333 Turnbull Canyon Road
Industry, California 91745**

Photograph 10

Description: Typical view of some of the drummed substances left by the previous occupant prior to the start of the clean up.

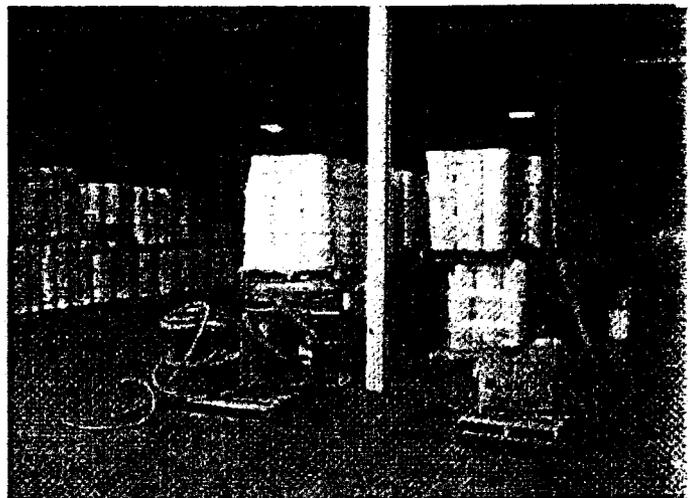
View: Interior



Photograph 11

Description: Typical view of some of the drummed substances left by the previous occupant prior to the start of the clean up.

View: Interior



Photograph 12

Description: Typical view of the warehouse interior prior to the start of the clean up.

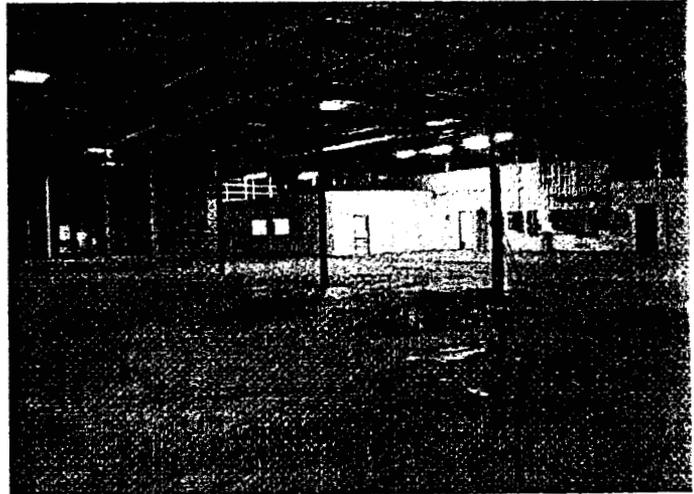
View: Interior



Photograph 13

Description: Typical view of the warehouse interior after removal of debris and prior to pressure washing.

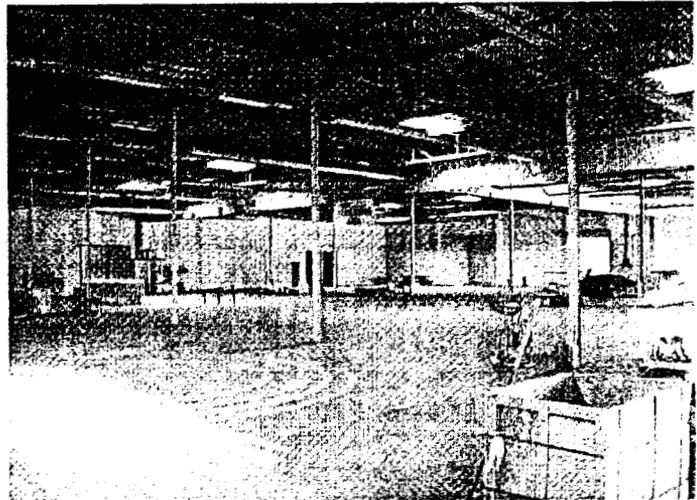
View: Interior



Photograph 14

Description: Typical view of the warehouse interior prior to the start of the clean up.

View: Interior



Photograph 15

Description: View of the northwest portion of the warehouse prior to the start of the clean up.

View: Interior



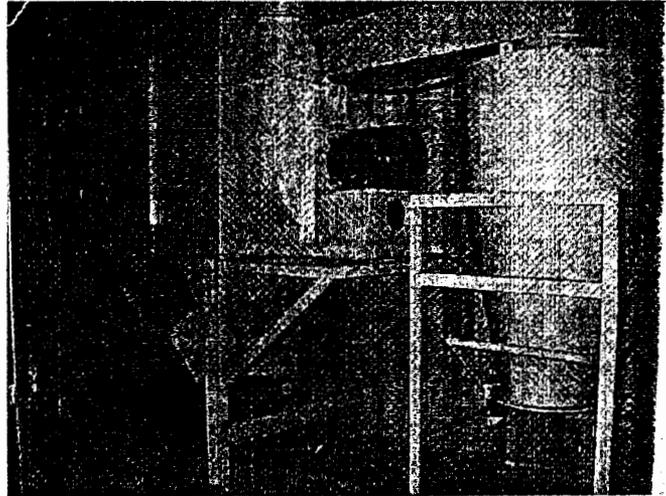
**Zions First National Bank
Lead Cleanup and Residual Substance
Removal Final Report**

**ARC International
333 Turnbull Canyon Road
Industry, California 91745**

Photograph 16

Description: View typical of the types of equipment left by the former occupant.

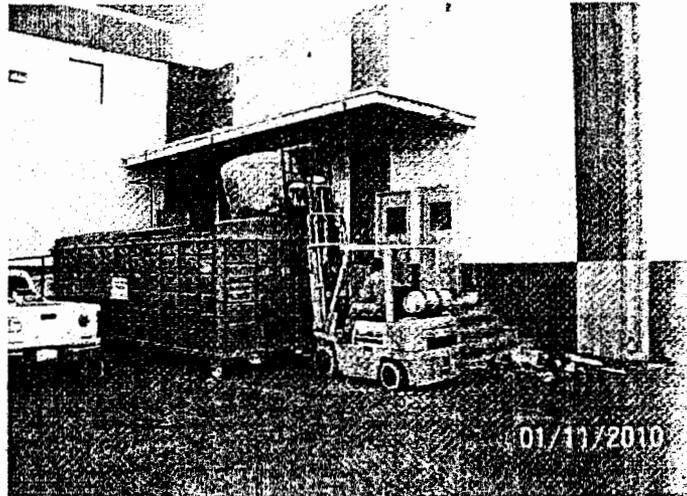
View: Interior



Photograph 17

Description: Loading some of the non-regulated debris for disposal.

View: South



Photograph 18

Description: View of the northwest portion of the warehouse during the first cleaning.

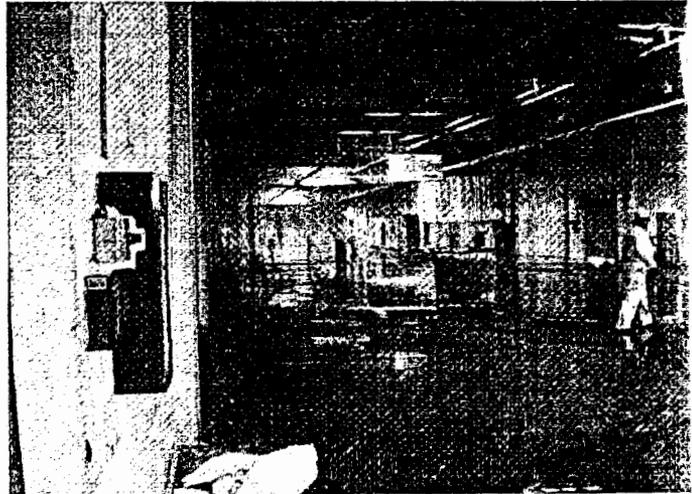
View: East



Photograph 19

Description: View of the northwest portion of the warehouse during the first cleaning.

View: East



Photograph 20

Description: View of the central portion of the warehouse prior to clean up.

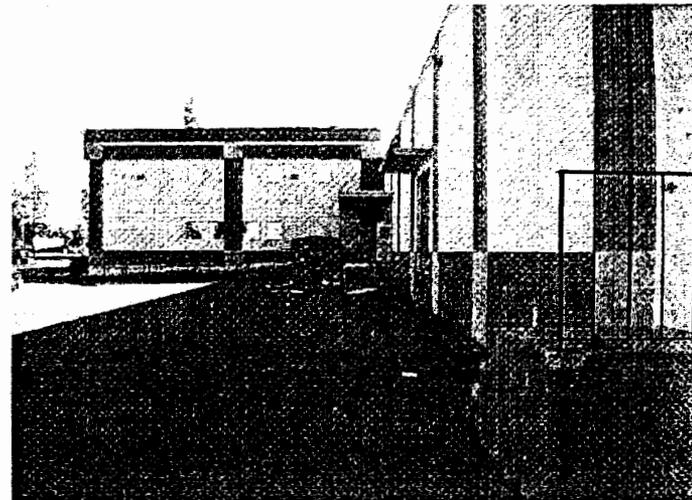
View: Interior



Photograph 21

Description: View from the northwest loading docks at the roll-off container staged to receive the non-regulated wastes for disposal.

View: Southeast



**Zions First National Bank
Lead Cleanup and Residual Substance
Removal Final Report**

**ARC International
333 Turnbull Canyon Road
Industry, California 91745**

Photograph 22

Description: Examination of the equipment determined to be painted with lead based paints..

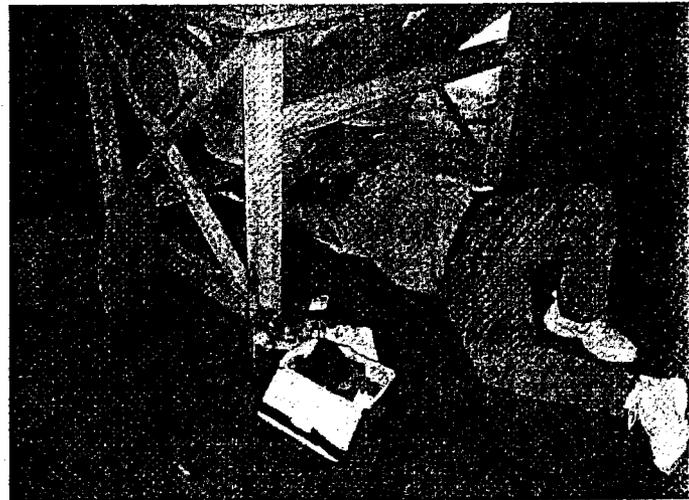
View: Interior



Photograph 23

Description: Sampling of the equipment for lead dusts..

View: Interior



Photograph 24

Description: Staged equipment for sampling.

View: Interior



Photograph 25

Description: Preparation of and sampling
of one of the floor sample
collection areas.

View: Interior



Photograph 26

Description: Preparation of and sampling
of one of the light fixtures
sample collection areas.

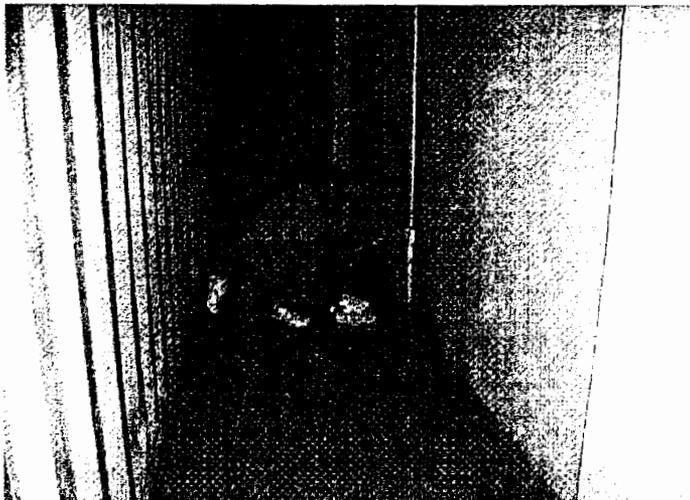
View: Interior



Photograph 27

Description: Preparation of and sampling
of one of the wall areas
behind a crusher in the
warehouse.

View: Interior



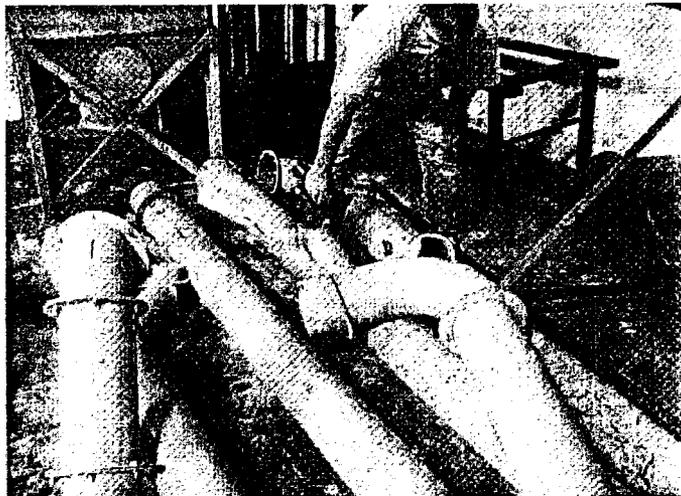
**Zions First National Bank
Lead Cleanup and Residual Substance
Removal Final Report**

**ARC International
333 Turnbull Canyon Road
Industry, California 91745**

Photograph 28

Description: XRF analysis of some of the equipment that was painted with lead based paints.

View: Interior



Photograph 29

Description: XRF analysis of the compactor that was painted with lead based paints.

View: Interior



Photograph 30

Description: XRF analysis of the shear that was painted with lead based paints.

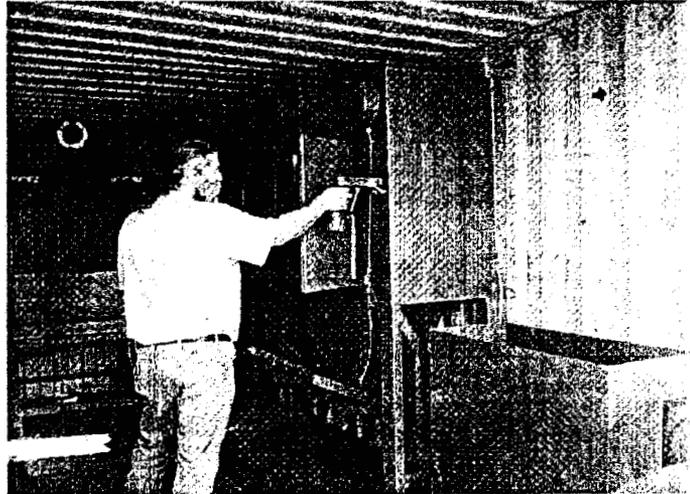
View: Interior



Photograph 31

Description: XRF analysis of some of the
crusher equipment on the
outside of the building.

View: NA



Photograph 32

Description: Preparation of and sampling
of the parking lot on the
exterior of the building.

View: NA



Photograph 33

Description: Interior view of the warehouse
with empty cardboard drums
staged for disposal.

View: Interior



**Zions First National Bank
Lead Cleanup and Residual Substance
Removal Final Report**

**ARC International
333 Turnbull Canyon Road
Industry, California 91745**

Photograph 34

Description: Resample of an area after cleaning that had tested at elevated levels and had been re-cleaned.

View: Interior



Photograph 35

Description: Sampling wells located in the central warehouse next to the compactor and shear and near the door in the background.

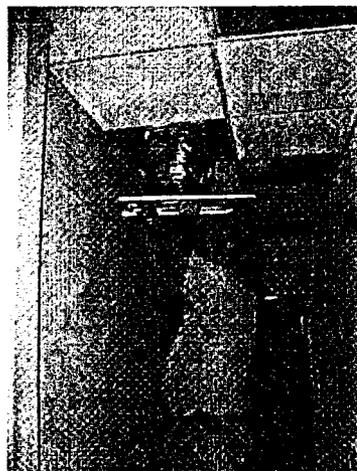
View: Interior



Photograph 36

Description: Sampling of an air duct located in the office adjacent to the warehouse for cadmium and mercury.

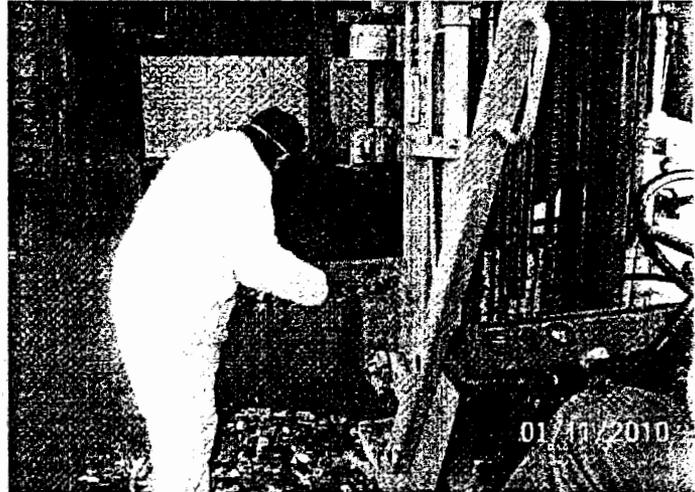
View: Interior



Photograph 37

Description: Cleaning of the loading dock
plates.

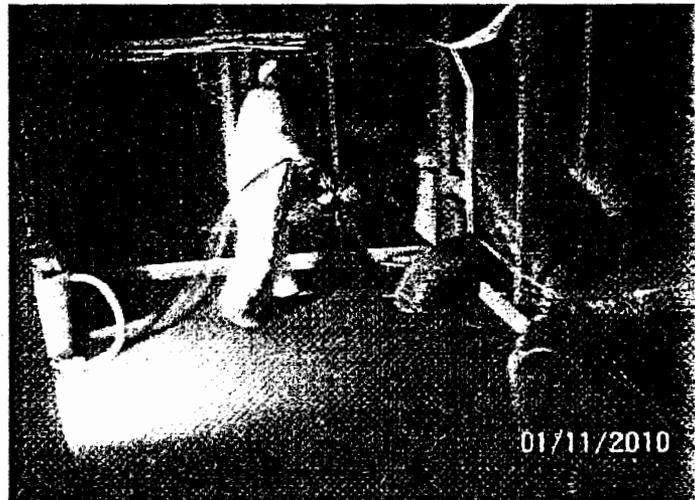
View: Southwest



Photograph 38

Description: HEPA vacuuming of the
warehouse area.

View: Interior



Photograph 39

Description: Pressure washing the
warehouse.

View: Interior



**Zions First National Bank
Lead Cleanup and Residual Substance
Removal Final Report**

**ARC International
333 Turnbull Canyon Road
Industry, California 91745**

Photograph 40

Description: Pressure washing the
warehouse.

View: Interior



Photograph 41

Description: Staged rinsate from the
warehouse cleaning.

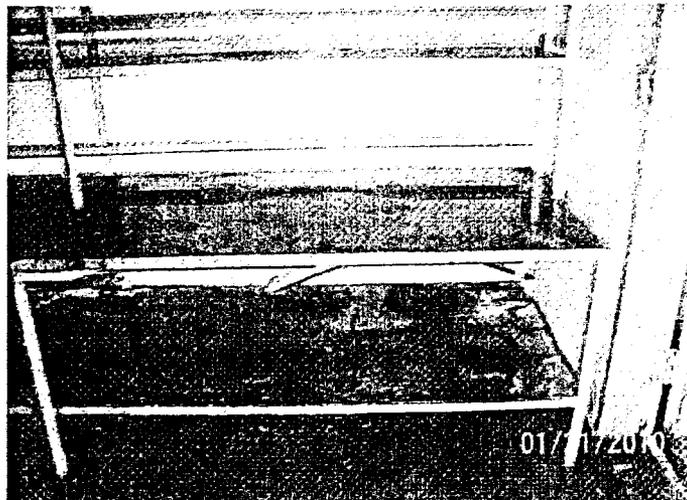
View: Interior



Photograph 42

Description: Cleaned chemical storage
area.

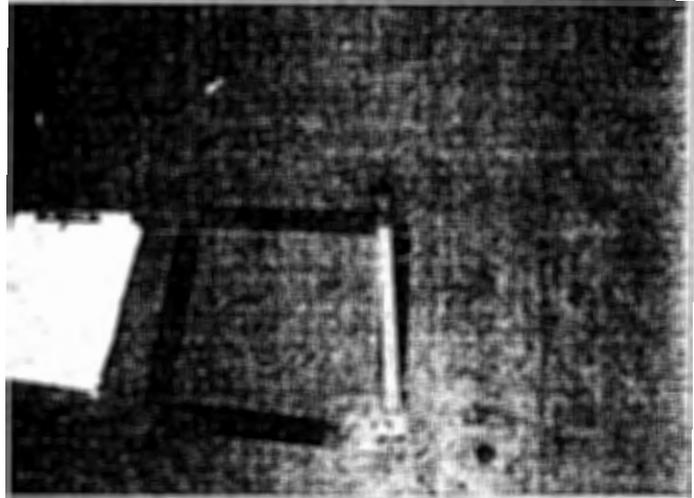
View: Interior



Photograph 43

Description: Typical sample layout.

View: Interior



Photograph 44

Description: Stained concrete on the southwest exterior after multiple pressure washings.

View: NA



APPENDIX I
CALI RESOURCES OFFER TO BUY
AND
DTSC EQUIPMENT SALE APPROVAL



CALI RESOURCES INC

RECYCLING SOLUTIONS

February 19, 2010

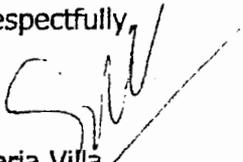
Zions First National Bank
C/O EarthTouch, Inc.
3135 N. Fairfield Road, #D
Layton, Utah 84041
Attn: Wes Dewsnup

Subject: 333 South Turnbull Canyon Road

Mr. Dewsnup,
Cali Resources, Inc. agrees to pay Zions First National Bank \$10.00 for each shipping container (total of six), including the dust collectors and/or compactors contained inside them. Cali Resources will also pay \$10.00 for each of the two dust collectors, the compactor, and the shear located within the warehouse area. The total due to Zions National Bank from Cali Resources is \$100.00 (total of ten pieces). It is understood the containers and equipment are sold in an 'as is' condition, with no warrantee as to their completeness or functionability. It is further understood that the containers will be moved from this location completely at Cali Resources cost. All of these materials will be removed from the site in a timely manner once they have been cleaned to a level acceptable to California Department of Toxic Substances Control (DTSC).

The compactor, shear, and dust collectors contain lead based paint. This equipment will be utilized within our recycling network for its intended purpose. The containers that have been cleaned and that do not have lead based paint will be utilized within our network or sent for recycling.

Respectfully,


Maria Villa
Assistant to the President
Cali Resources, Inc.

Wes Dawsnup

From: Ellen Pates [epates@dtsc.ca.gov]
Sent: Monday, February 22, 2010 10:13 AM
To: wdawsnup@earthtouchinc.com
Subject: Re: Cali Resources Letter

Wes,

This letter is sufficient for the removal of equipment at the facility.

Thank you.

Ellen Pates
Hazardous Substances Scientist
Statewide Compliance Division
Glendale Office
818.551.2987
818.551.2850 fax
>>> "Wes Dawsnup" <wdawsnup@earthtouchinc.com> 02/19/10 12:57 PM >>>
Ellen

Here is a copy of the most recent revision of the CaliResources letter indicating that all equipment with lead based paint will be utilized for its intended purpose. Any equipment that has been cleaned to the satisfaction of DTSC may be utilized for the intended purposes or dealt with as scrap.
Please review the letter and if you need further clarification let me know ASAP.

Thanks

Wesley G. Dawsnup
EarthTouch, Inc.
(801) 771-2800 x 110 Office
(801) 771-2838 Fax
(801) 499-9557 Cell
wdawsnup@earthtouchinc.com

APPENDIX J
EQUIPMENT BILL OF SALE

ZIONS BANK

CREDIT MANAGEMENT DEPARTMENT

Zions First National Bank
P.O. Box 30709
Salt Lake City, Utah
84130-0709

or
Hand Delivered Mail to:
Credit Management Department
Gateway Tower East 5th Floor
1 South Main, Suite 500
Salt Lake City, Utah
84111
(801) 524-4601

BILL OF SALE

ZIONS FIRST NATIONAL BANK, a subsidiary of Zions Bancorporation, having its principal place of business at One South Main Street, Salt Lake City, UT 84133-1109, ("Seller") in consideration of One Hundred and no/100 (\$100.00) Dollars, receipt whereof is hereby acknowledged, does hereby sell, assign, transfer and set over to CALI RESOURCES, INC. ("Buyer"), the following described personal property (the "Property"), located on the premises at 333 Turnbull Canyon Road, Industry, CA (the "Premises"):

Six (6) shipping containers, including any "dust collectors" and/or "compactors" contained therein;
Two (2) "dust collectors";
One (1) "compactor"; and
One (1) "shear."

Title to the Property is transferred at the Property's current location and Buyer is responsible for removal of the Property at its own cost. The Property is transferred as it exists, all in "as-is, where-is" condition. Buyer shall remove the Property in accordance with all applicable laws in a timely and workmanlike manner. Such removal shall not damage or negatively impact the Premises. Buyer shall be responsible for any damage or negative impact from such removal and shall promptly and at its own cost repair and restore the Premises to as good or better condition than existed prior to Buyer's activities on the Premises.

Buyer acknowledges that the Property has been contaminated with lead dust and may contain lead based paint. Seller represents that it has addressed lead dust on the Property as provided in that certain Work Plan for Lead Clean Up and Residual Substance Removal approved by the California Department of Toxic Substances Control (DTSC) on December 9, 2009. Notwithstanding the foregoing, Seller provides no warranty that the Property is free from contamination. As substantial consideration for its purchase of the Property, Buyer assumes any and all responsibility and liability for the Property and hereby agrees to release, indemnify, defend, and hold harmless Seller for, from, and against any and all liability or responsibility for or in any way related to the Property. ALL EXPRESS AND/OR IMPLIED WARRANTIES OF QUALITY, FITNESS AND MERCHANTABILITY ARE HEREBY EXCLUDED.

ZIONS BANK

CREDIT MANAGEMENT DEPARTMENT

IN WITNESS WHEREOF, Seller has caused this Bill of Sale to be signed in its name by
ZACHARY NELSON, its VICE PRESIDENT, on this 26 day of February, 2010.

ZIONS FIRST NATIONAL BANK

By _____

CALI RESOURCES, INC

By _____

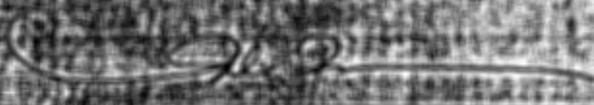
STATEMENT OF THIS REVIEW FORM

ARC INTERNATIONAL CORPORATION

171 J. TRACY

PO BOX 999 1115 0216

THE STATEMENTS CONTAINED UNDER THIS RELEASE FORM WERE REVIEWED FOR CONFIDENTIAL MATERIALS AND ARE APPROVED FOR RELEASE TO THE PUBLIC. THE FILE HAS NOT BEEN REVIEWED BY THE OFFICE OF LEGAL COUNSEL OR THE ATTORNEY GENERAL'S OFFICE. THIS STATEMENT HAS BEEN SIGNED BY A REVIEWING ATTORNEY.



DATE REVIEWED

11-21-10



Linda S. Adams
Secretary for
Environmental Protection



Department of Toxic Substances Control

Maureen F. Gorsen, Director
9211 Oakdale Avenue
Chatsworth, California 91311



Arnold Schwarzenegger
Governor

SUMMARY OF OBSERVATIONS

On March 27, 2009, the Department of Toxic Substances Control (DTSC), California Environmental Protection Agency, conducted an inspection at:

Facility Name: ARC International Corp

Facility Address: 333 Turnbull Canyon Road.
City of Industry, CA 91744

EPA ID Number: CAL 000315696 County: Los Angeles

Check box below as appropriate

DTSC provided you an inspection report at the end of this inspection. Photographs and any other material from the inspection will be forwarded to you within 65 days of this inspection.

- As a result of this inspection, no violations of hazardous waste laws, regulations, and requirements were discovered. DTSC greatly appreciates the efforts you have made to comply with the hazardous waste laws and regulations.
- As a result of this inspection, no violations of hazardous waste laws, regulations, and requirements were discovered. However, DTSC is still reviewing compliance information. Violations may be found after the site visit, and these will be identified to you in written correspondence.
- As a result of this inspection the issue(s) listed in Section IV require additional investigation. Violations may be found after the site visit, and these will be identified to you in written correspondence.

Company Representative Accepting Summary

DTSC Representative

Name Quinten Zhang

Name Ellen Pates

Signature [Signature]

Signature [Signature]

Title Assistant

Title Hazardous Substance Scientist

Date 03/27/2009

Date March 27, 2009

Department of Toxic Substances Control

9211 Oakdale Avenue
Chatsworth, California 91311

SUMMARY OF VIOLATIONS

Facility Name: ARC International

Date: 3-27-09

SECTION IV: OTHER ISSUES/CONCERNS

The following issues/concerns were 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.

Met w/ Quinten Zhang (in charge of the warehouse) consent granted.
Did the walkthrough and checked trucks. Observed recyclable plastics bottles and general merchandise stored in the warehouse.
(i.e. clothes)

Spoke w/ Jay Hooper on the phone @ 11:00 am and verified and explained the purpose of my visit. He said he doesn't collect any lead-acid batteries only recyclable plastic and general merchandise that he leases out to tenants for storage.

* I addressed to Mr. Hooper the areas of contamination outside the building should be clear and should not be use for any storage (observed metal steel and bailed plastic bottles)* see pictures
I also explained the he failed to follow the closure plan and ARC he ~~should~~^{is} International Corp have not been properly closed.

* Complaint allegations is not substantiated. No lead-acid batteries at the site location or being handled at the location alleged.

S. Pates 3/27/09



Linda S. Adams
Secretary for
Environmental Protection



Department of Toxic Substances Control

Maureen F. Gorsen, Director
9211 Oakdale Avenue
Chatsworth, California 91311



Arnold Schwarzenegger
Governor

SUMMARY OF VIOLATIONS

On JANUARY 7, 2009, the Department of Toxic Substances Control (DTSC), California Environmental Protection Agency, conducted an inspection at:

Facility Name: ARC INTERNATIONAL CORPORATION

Facility Address: 333 TURNBULL CANYON ROAD
CITY OF INDUSTRY, CA 91745

EPA ID Number: CAR000180257 County: 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 to you in written correspondence.

DTSC provided you an inspection report at the end of this inspection. Photographs and any other material from the inspection will be forwarded to you within 65 days 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

Name Mike Easterbrook

Signature [Signature]

Title Env. Compliance

Date 01/07/2009

DTSC Representative

Name ELLEN PATES

Signature [Signature]

Title HAZARDOUS SUBSTANCES SCIENTIST

Date JANUARY 7, 2009

Department of Toxic Substances Control

9211 Oakdale Avenue
Chatsworth, California 91311

SUMMARY OF VIOLATIONS

Facility Name: ARC INTERNATIONAL CORPORATION Date: JANUARY 7, 2009

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.

DISPOSAL OF CRT and UNIVERSAL WASTE

- ① ARC International Corporation violated California Code of Regulation, title 22, section 66273. 81(a) on or about January 7, 2009, ARC International Corporation disposed of CRT material (broken CRT glass, debris) into a roll-off bin to be sent landfill.

Evidence: Photographs
Complaint submitted by L.A. County Fire
Observations made by inspectors (E. Pates, K. Chen, Darin Childress, Corbuz Trappel),
Statement made by Jay Hooper, owner and Mike Easterbrook (part time consultant)
Sam Hana

Schedule of Compliance: By January 12, 2009, ARC International shall properly clean and dispose the CRT material to an authorized disposal facility.

NOTE: Filter Recycling OR (POSSIBLE CONTRACTOR to do the work)
JC Environmental

- ② ARC International Corporation violated CCR, title 22, section 66273. 31(a) on or about January 7, 2009, ARC International Corp disposed universal waste lamps and universal waste batteries into a roll-off bin to be sent to landfill.

Evidence: Same as above

Schedule of Compliance: By January 12, 2009, ARC Inter shall properly dispose the UW Lamps and UW Batteries to an authorized disposal facility

Department of Toxic Substances Control

9211 Oakdale Avenue
Chatsworth, California 91311

SUMMARY OF VIOLATIONS

Facility Name: ARC INTERNATIONAL CORPORATION Date: 1-7-09

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

3

WASTE MANAGEMENT

ARC International Corp violated CCR, title 22, section 66273.83(a)(1) on or about 1-7-09, failed to contain, to prevent release and compatible with the contents of the containers.

Evidence: Photographs
Observations by inspectors

Schedule of Compliance: Effective immediately, ARC International shall contain any CRT materials in containers to prevent release and compatible w/ the contents of the containers.

4

RESPONSE TO RELEASE

ARC violated CCR, title 22 section 66273.87(a) on or about 1-7-08, ARC failed to immediately contain all releases of CRT material and residue from CRT material

Evidence: Photographs
Observation by inspectors

Schedule of Compliance: By Jan 12, 2009, ARC shall immediately contain all releases of CRT material and residue from CRT materials.

5

BAGHOUSE DUST

ARC violated CCR, title 22, section 66273.83(d)(15) on or about 1-7-09, ARC failed to ensure that all materials generated as a result of the treatment processes are properly classified and managed.

Evidence: photographs
Observations by inspectors

Schedule of Compliance: Within 15 business days, ARC shall ensure all materials generated as a result of the treatment process are properly classified and managed.

Department of Toxic Substances Control

9211 Oakdale Avenue
Chatsworth, California 91311

SUMMARY OF VIOLATIONS

Facility Name: ARC International Corporation Date: 1/7/09

Continuation Sheet for SECTION II: MINOR VIOLATIONS/ NOTICE TO COMPLY

(6) Labeling/Marking
ARC International Corp violated CCR, title 22, section 66273.84 on or about January 7, 2009, in that ARC failed to properly label or clearly mark each container or pallet in or on which CRTs, CRT devices or CRT glass are contained.

Evidence: Photographs
Observations

Schedule of Compliance: ARC shall label the ¹⁵~~13~~ boxes of CRT glasses and several bag-house dust from the treatment process of CRTs within 10 days of this inspection.

Department of Toxic Substances Control

9211 Oakdale Avenue
Chatsworth, California 91311

SUMMARY OF VIOLATIONS

Facility Name: ARC INTERNATIONAL Date: 1-7-09

SECTION IV: OTHER ISSUES/CONCERNS

The following issues/concerns were identified during this inspection. Further research may identify additional violations. Any new violations, with the required corrective action and compliance schedule, will be identified to you in written correspondence.

* ARC Closure Plan

- Update information include outside western end of the building

* Waste Oil and Waste Paint - related

- ensure properly dispose to an authorized facility

* Records

Must provide records for previous shipments of CRTs, UWEDs, ~~HW~~ Lead Acid Batteries, UW Lamps and Batteries.

Universal Waste Lamp Handler Inspection Report

Facility Name: ARC International Corporation
 Identification Number: CA R000180257
 Facility Address: 333 Turnbull Canyon Road
City of Industry, CA 91745
 Date Inspected: January 7, 2009
 Inspected By: Ellen Pates and Kam Chen
 Type of Inspection: Limited Re-inspection Complaint
 Consent given by: Jay Hooper - Owner Time: 10:30 AM

DISCLAIMER

This checklist is intended to provide guidance only. This checklist does not replace or supersede relevant statutes and regulations. The information contained in this checklist is based upon the statutes and regulations in effect as of the date the checklist was signed. Interested parties are advised to keep apprised of subsequent changes to relevant statutes and regulations. Note: Refer to Title 22 of the California Code of Regulations for citations that start with the number 6.

Refer to the Health and Safety Code for citations that start with the number 2.

REGULATED FACILITIES AND WASTE DEFINITIONS (66273.9)

Universal Waste Handler: a generator of universal waste; or the owner or operator of a facility.

Generator or Producer: any person, by site, whose act or process produces a hazardous waste (or universal waste), or whose act first causes a hazardous waste (or universal waste) to become subject to regulation.

Household: a private residence. Universal waste lamps generated incidental to owning and maintaining a place of residence may be disposed of in a municipal landfill in unlimited quantities through February 8, 2006. After that date, households may not dispose of any lamps in a municipal landfill. [66273.8(a)(1)]

Conditionally Exempt Small Quantity Universal Waste Generator: (CESQUWG) a generator of no more than 100 kilograms of RCRA hazardous wastes (includes all universal waste except CRT materials) and no more than 1 kilogram of acutely hazardous waste in any calendar month, a total of five or less CRT devices in a calendar year; and remains in compliance with 40 CFR 261.5. Through February 8, 2006, a CESQUWG may dispose of no more than 30 fluorescent tubes in any calendar month at a municipal landfill. [66273.8(a)(3)(A)1] After that date, a CESQUWG must recycle all lamps and they may not dispose of any lamps in a municipal landfill.

Small Quantity Handler of Universal Waste (SQHUW): a handler of universal waste who does not accumulate 5,000 kilograms (~ 25,000 florescent tubes) or more total universal waste at any time.

Large Quantity Handler of Universal Waste (LQHUW): a handler that accumulates 5,000 kilograms (~ 25,000 florescent tubes) or more of total universal waste at any time. Designation as a LQHUW is retained through the end of the calendar year in which 5,000 kilograms or more total universal waste is accumulated.

Check box if violation: (if checked see attached SOV)

Identification Numbers (LQHUW Only)	
<input type="checkbox"/>	Failed to have an EPA Identification number before meeting or exceeding 5,000 kilogram storage limit. [66273.32(a)(1)]
Unauthorized Disposal and Statements	
<input checked="" type="checkbox"/>	The universal waste lamp generator disposed of universal waste lamps at unauthorized point. [66273.11(a)] SQHUW; [66273.31(a)] LQHUW
<input type="checkbox"/>	Made false statement(s) in application, label, manifest, record, report, permit or other document. [25189.2(a)]
Labeling of Universal Waste Lamps	
<input type="checkbox"/>	Failed to properly label or mark universal waste lamps or container or package in which lamps are contained with one of the following phrases: "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)." [66273.14(c)] SQHUW; [66273.34(c)] LQHUW

Accumulation Time	
<input type="checkbox"/>	Accumulated universal waste lamps for longer than one year from generation date or longer than one year without proving that such an activity is solely for the purpose of facilitating proper recovery, treatment, or disposal. [66273.15] SQHUW; [66273.35] LQHUW
<input type="checkbox"/>	Failed to demonstrate a date on which the universal waste lamp(s) became a waste. [66273.15(c)] SQHUW; [66273.35(c)] LQHUW
Use and Management of Containers	
<input type="checkbox"/>	Failed to manage universal waste lamps in a way that prevents releases to the environment. [66273.13(c)] SQHUW; [66273.33(c)] LQHUW
<input type="checkbox"/>	Failed to contain universal waste lamps in a closed, structurally sound, compatible container that does not show evidence of leakage or damage. [66273.13(c)(1)] SQHUW; [66273.33(c)(1)] LQHUW

Cathode Ray Tube (CRT) Material Handler (MH) Inspection Report

Facility Name: ARC International Corporation
 Identification Number: CAR 000180257
 Facility Address: 333 Turnbull Canyon Road
City of Industry, CA 91745
 Date Inspected: January 7, 2009
 Inspected By: Ellen Pates and Kam Chen
 Type of Inspection: Annual Re-inspection Complaint
 Consent given by: Say Hooper - Owner Time: 10:30 AM

DISCLAIMER

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Citations that start with the number "66" are to the California Code of Regulations (CCR), title 22, division 4.5. Citations that start with the number "42" are to the Public Resources Code, division 30, part 3, chapter 8.5.

If the CRT Recycler is a permitted Hazardous Waste (HW) Facility, the inspector shall contact DTSC staff responsible for maintaining that facility's permit to determine if additional requirements apply to CRT activities carried out at the facility.

REGULATED WASTES

CRTs (AKA covered electronic devices) are defined as a cathode ray tube, cathode ray tube device, flat panel screen, or any other similar video display device with a screen size that is greater than four inches in size measured diagonally and which the DTSC determines, when discarded or disposed, would be a hazardous waste pursuant to Chapter 6.5 (commencing with Section 25100) of Division 20 of the Health and Safety Code. [42463(f)(1)]

Check box if violation: (if checked see attached SOV)

PROHIBITIONS	
<input checked="" type="checkbox"/>	Disposed of a CRT material. [66273.81(a)]
<input type="checkbox"/>	Diluted or treated a CRT material unless requirements of this section are met. [66273.81(b)]
NOTIFICATION & ANNUAL REPORT	
<input type="checkbox"/>	Failed to notify DTSC at least 30 days prior to accepting any CRT materials from an offsite source. [66273.82(a)]
<input type="checkbox"/>	Failed to submit an annual report to DTSC, if CRT MH accepted >5 CRTs, >5 CRT devices, or >100 kg of CRT glass per calendar year from any offsite source. [66273.82(b)(2)]
<input type="checkbox"/>	Failed to submit annual report to DTSC, if CRT MH generates ≥5,000 kg of CRT material per calendar year. [66273.82(b)(3)]
<input type="checkbox"/>	Failed to submit written annual report to DTSC by February 1 of each calendar year. [66273.82(b)]
<input type="checkbox"/>	Submitted an incomplete notification or annual report. [66273.82(a) & (b)(4)]
<input type="checkbox"/>	A CRT MH who performs data conversions derived from mass data failed to include the conversion factor(s) in the annual report. [66273.82(c)]
<input type="checkbox"/>	Failed to submit a written notification or annual report by certified mail, return receipt. [66273.82(d)]

WASTE MANAGEMENT	
<input checked="" type="checkbox"/>	Failed to contain any CRT materials in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the container. [66273.83(a)(1)]
<input type="checkbox"/>	Failed to immediately clean up and place in a container any CRT material that is broken or shows evidence of breakage, leakage, or damage. [66273.83(a)(2)]
<input type="checkbox"/>	Failed to safely remove CRTs from CRT devices. [66273.83(b)(1)]
<input type="checkbox"/>	Failed to determine whether any of the remaining portions of the CRT device or any other waste generated during the removal process exhibits any characteristic of a HW. [66273.83(b)(2)]
YOKE REMOVAL	
<input type="checkbox"/>	Failed to remove yoke without breaking CRT glass and MH does not meet treatment/recycling standards. [66273.83(c)(1)]
<input type="checkbox"/>	Failed to submit complete notification by certified mail regarding yoke removal. [66273.83(c)(2)]
<input type="checkbox"/>	Failed to maintain notification, air permit and other permits (as required), and produce these documents when requested. [66273.83(c)(3)]

<input type="checkbox"/>	Failed to submit the annual report to DTSC by February 1 of each calendar year and by certified mail. [66273.83(c)(4)]
<input type="checkbox"/>	Accepted CRTs or CRT devices that are managed, or are required to be managed as hazardous waste. [66273.83(c)(5)]
<input type="checkbox"/>	Failed to conduct treatment for the purpose of recycling the CRTs or CRT devices. [66273.83(c)(6)]
<input type="checkbox"/>	Failed to ensure all treatment is conducted over or in a containment device sufficient in size and construction to contain any CRT glass that may be released during yoke removal. [66273.83(c)(7)]
<input type="checkbox"/>	Failed to utilize only mechanical methods to remove the yoke. [66273.83(c)(8)]
<input type="checkbox"/>	Used heat, chemicals, or water in yoke removal process. [66273.83(c)(9)]
<input type="checkbox"/>	Failed to ensure that all persons that perform treatment are thoroughly familiar with hazards and have access to proper procedures and protective equipment necessary to safely conduct treatment and to comply with applicable requirements. [66273.83(c)(10)]
<input type="checkbox"/>	Failed to ensure that the facility is operated in compliance with all applicable local and state air pollution control laws and regulations. [66273.83(c)(11)]
<input type="checkbox"/>	Failed to ensure that the facility is operated in compliance with all applicable worker health and safety laws and regulations. [66273.83(c)(12)]
<input type="checkbox"/>	Failed to ensure that all materials generated as a result of the treatment processes are classified and managed properly. [66273.83(c)(13)]
<input type="checkbox"/>	Failed to ensure that the activities conducted at the facility are consistent with local zoning or land use requirements. [66273.83(c)(14)]
<input type="checkbox"/>	Failed to maintain compliance with location, seismic, and precipitation design standards requirements. [66273.83(c)(15)]
	CRT TREATMENT OR RECYCLING
<input type="checkbox"/>	Failed to notify DTSC no later than 30 days prior to treating or recycling the CRT material. [66273.83(d)(1)(A)(1)]
<input type="checkbox"/>	Failed to notify DTSC no later than 30 days prior to ceasing treatment or recycling activities. [66273.83(d)(1)(A)3]
<input type="checkbox"/>	Failed to notify the DTSC no later than 30 days after ceasing treatment or recycling activities. [66273.83(d)(1)(A)3]
<input type="checkbox"/>	Failed to complete notification and sign, and date notification as specified in title 22 CCR 66270.11. [66273.83(d)(1)(A)2, 4, 5 and 66273.83(d)(1)(B)]

<input type="checkbox"/>	Failed to submit to DTSC by certified mail a cost estimate for closure no later than 30 days prior to recycling or treating CRT materials. [66273.83(d)(2)]
<input type="checkbox"/>	Failed to submit to DTSC documentation demonstrating financial assurance for closure no later than 30 days prior to recycling or treating. [66273.83(d)(3)]
<input type="checkbox"/>	Failed to submit to DTSC documentation demonstrating financial responsibility for liability no later than 30 days prior to recycling or treating. [66273.83(d)(4)]
<input type="checkbox"/>	Failed to maintain on file the most recent notification and air permit (if required) and produce these records when requested. [66273.83(d)(5)]
<input type="checkbox"/>	Failed to prepare and submit an annual report to DTSC by February 1 of each calendar year. [66273.83(d)(6)]
<input type="checkbox"/>	Submitted an incomplete annual report. [66273.83(d)(6)]
<input type="checkbox"/>	Accepted any CRT material that is managed, or is required to be managed, as HW. [66273.83(d)(7)]
<input type="checkbox"/>	Conducted the treatment for the purpose of recycling one or more types of CRT glass and failed to reclaim the CRT glass at a CRT glass manufacturer or at a primary or secondary lead smelter. [66273.83(d)(8)]
<input type="checkbox"/>	Failed to ensure all treatment is conducted over or in a containment device sufficient in size and construction to contain any CRT glass that may be released. [66273.83(d)(9)]
<input type="checkbox"/>	Failed to utilize specified treatment methods. [66273.83(d)(10)]
<input type="checkbox"/>	Conducted treatment using chemicals or external heat other than specified in regulation. [66273.83(d)(11)]
<input type="checkbox"/>	Failed to ensure that the facility is operated in compliance with all applicable local and state air pollution control laws and regulations. [66273.83(d)(13)]
<input type="checkbox"/>	Failed to ensure that the facility is operated in compliance with all applicable worker health and safety laws and regulations. [66273.83(d)(14)]
<input checked="" type="checkbox"/>	Failed to ensure that all materials generated as a result of the treatment processes are properly classified and managed. [66273.83(d)(15)]
<input type="checkbox"/>	Failed to ensure that the activities conducted at the facility are consistent with local zoning or land use requirements. [66273.83(d)(16)]
<input type="checkbox"/>	Failed to maintain compliance with location standards and seismic and precipitation design standards requirements. [66273.83(d)(17)]

(5)

LABELING/MARKING	
<input checked="" type="checkbox"/>	Failed to properly label or clearly mark each container or pallet in or on which CRTs, CRT devices or CRT glass are contained. [66273.84]
<input type="checkbox"/>	Failed to properly label a designated area where CRTs and CRT devices are accumulated within demarcated boundaries. [66273.84)(d)]
<input type="checkbox"/>	Stored CRTs and CRT devices along with other materials in designated CRT accumulation areas. [66273.84)(d)]
ACCUMULATION TIME LIMITS	
<input type="checkbox"/>	Accumulated CRT material for more than one year from the date the universal waste (UW) is generated, or received from another handler. [66273.85(a)]
<input type="checkbox"/>	Failed to demonstrate the length of time that the UW has been accumulated from the date it became a waste or was received. [66273.85(b)]
EMPLOYEE TRAINING	
<input type="checkbox"/>	Failed to ensure that persons removing CRTs are thoroughly familiar with the techniques and safety precautions required to safely remove CRTs.[66273.83(b)(1)(C)]
<input type="checkbox"/>	Failed to ensure that all persons that perform treatment or recycling are thoroughly familiar with the associated hazards and have access to the proper procedures and protective equipment necessary to safely conduct the treatment. [66273.83(d)(12)]
<input type="checkbox"/>	Failed to inform all employees who handle or have responsibility for managing CRT material of the proper handling and emergency procedures. [66273.86(a)]
<input type="checkbox"/>	Employees who manage or handle waste CRT materials failed to receive specified initial training. [66273.86(b)]
<input type="checkbox"/>	Employees failed to take part in annual review of the initial training. [66273.86(c)]
RESPONSE TO RELEASES	
<input checked="" type="checkbox"/>	Failed to immediately contain all releases of CRT material and residues from CRT material. [66273.87(a)]
<input type="checkbox"/>	Failed to determine whether any material resulting from a release is a HW. [66273.87(b)]
<input type="checkbox"/>	Failed to manage any material determined to be HW as HW. [66273.87(b)]
<input type="checkbox"/>	Managed residues of leaking, broken, or damaged CRT material as UW without repackaging according to applicable standards. [66273.87(c)]

OFF-SITE SHIPMENTS	
<input type="checkbox"/>	Sent or took CRT material to a place other than another CRT MH, a destination facility, or a foreign destination. [66273.88(a)]
<input type="checkbox"/>	A CRT MH that transports CRT material off-site failed to comply with the UW transporter requirements. [66273.88(b)]
<input type="checkbox"/>	A CRT MH that offers CRT material that meets the definition of a hazardous material for off-site transportation failed to package, label, mark and placard the shipment according to applicable United States Department of Transportation (U.S DOT) regulations. [66273.88(c)]
<input type="checkbox"/>	The originating CRT MH failed to obtain an agreement from the receiving CRT MH prior to sending a shipment of CRT material. [66273.88(d)]
<input type="checkbox"/>	The originating CRT MH failed to follow rejected load procedures. [66273.88(e)]
<input type="checkbox"/>	The receiving CRT MH that rejects a shipment of CRT material failed to follow rejected load procedures. [66273.88(f)]
<input type="checkbox"/>	A CRT MH that receives a shipment of CRT material containing HW failed to notify DTSC of the shipment. [66273.88(g)]
<input type="checkbox"/>	A CRT MH that receives a shipment of non-hazardous, non-UW, failed to manage the waste in compliance with applicable federal, state, and local solid waste regulations. [66273.88(h)]
EXPORT	
<input type="checkbox"/>	Failed to notify DTSC four weeks before the intended initial shipment of CRT material to any foreign destination. [66273.90(a)]
<input type="checkbox"/>	Failed to notify CUPA of the intended export. [66273.90(a)]
<input type="checkbox"/>	Submitted an incomplete notification. [66273.90(b)]
<input type="checkbox"/>	Failed to notify the DTSC at least 60 days prior to export, the destination, contents, and volume of covered electronic waste (e-waste) to be exported to any foreign destination. [42476.5(a)]
<input type="checkbox"/>	Failed to demonstrate that the importation of covered e-waste is not prohibited by any applicable law or regulation of the country of destination and that any import is conducted in accordance with all applicable laws. [42476.5(b)]
<input type="checkbox"/>	Failed to forward required import and operating licenses to the DTSC. [42476.5(b)]

SUMMARY OF VIOLATIONS

On MARCH 26, 2008, the Department of Toxic Substances Control (DTSC), California Environmental Protection Agency, conducted an inspection at:

Facility Name: ARC INTERNATIONAL CORP.

Facility Address: 533 TURNBULL CANYON ROAD CITY OF INDUSTRY, CA

EPA ID Number: CAL 000315696

County Name: LOS ANGELES

As a result of that inspection, the 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. If you disagree with any of the violations listed in Section I, you must give the inspector who issued the Notice to Comply a written notice of disagreement.

You must correct the violations listed in Section III: Minor Violations, within NA days. Within five working days of achieving compliance, you must sign the statement certifying compliance at the bottom of Section III and return it to DTSC at the address 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 violation. DTSC may reinspect this facility at any time.

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 or the findings of the report. 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 that have not been corrected within the time provided in the Notice to comply.

Company Representative Accepting Summary

Department Representative

Name

Mike Eastelbrak

Name

EILEEN PATES

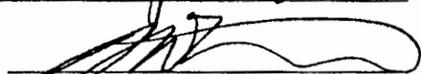
Title

Env. Compliance Director

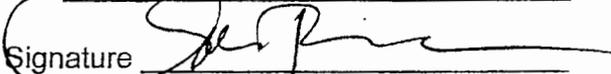
Title

HAZARDOUS SUBSTANCES SCIENTIST

Signature



Signature



Date

3/26/08

Date

MARCH 26, 2008

SUMMARY OF VIOLATIONS

Facility Name: ARC International Date: March 26, 2008

SECTION I: CLASS I VIOLATIONS AND REQUIRED CORRECTIVE ACTION

HEPA FILTER MANAGE AS HAZARDOUS WASTE

- ① ARC International violated California Code of Regulations (CCR), Title 22, Section 66273.33(d)(3)(F)(b)(c), on or about March 26, 2008, ARC failed to ensure that all hazardous wastes generated from treatment activities that are sent offsite for disposal are manifested.

Evidence: Sent Filter for testing, results showed high levels of lead.

Compliance: ARC International shall ensure that all hazardous waste (lead) generated from the treatment activities are manifested.

- ② ARC International violated CCR title 22, section 66273.83(d)(15) and 66273.33(d)(3)(F)(5), on or about March 26, 2008, ARC failed to ensure that all materials generated as a result of the treatment processes are properly classified and managed.

Evidence: Observations made by inspectors
i.e. Hepa Filter waste, mixed plastics w/ ^{crushed} glass.

Compliance: ^{Effective immediately} ARC International shall ensure that all materials generated as a result of the treatment processes are properly classified and managed.

SUMMARY OF VIOLATIONSFacility Name: ARC INTERNATIONAL CORPDate: MARCH 26, 2008**Continuation Sheet for SECTION II: CLASS II VIOLATIONS
AND REQUIRED CORRECTIVE ACTION**

③ ARC INTERNATIONAL VIOLATED CALIFORNIA CODE OF REGULATIONS
TITLE 22, SECTIONS 66265.142 AND 66273.33(d)(3)(F)(7)(a)
IN THAT ON OR ABOUT MARCH 26, 2008 ARC INTERNATIONAL
SUBMITTED AN INCOMPLETE CLOSURE COST ESTIMATE
PURSUANT TO THE SPECIFIED REQUIREMENTS.

EVIDENCE:

- OBSERVATIONS MADE DURING THE TIME OF INSPECTION
BY DTSC INSPECTORS
- COPY OF INCOMPLETE CCE (CLOSURE COST ESTIMATE)
 - Must include 2 Equipment

COMPLIANCE:

EFFECTIVE IMMEDIATELY, ARC INTERNATIONAL SHALL
COMPLY WITH THE SPECIFIED REQUIREMENTS IN
CALIFORNIA CODE OF REGULATIONS, TITLE 22, SECTIONS
66265.142 AND 66273.33(d)(3)(F)(7)(a).

SB 20 / Universal Waste (UW) Large Quantity Handler Inspection Report

Facility Name: ARC INTERNATIONAL CORP
 Identification Number: CAL 000815696
 Facility Address: 383 TURNBULL CANYON ROAD
CITY OF INDUSTRY, CA 91744
 Date Inspected: MARCH 26, 2008
 Inspected By: ELLEN FATES and TOLLU ANOSIKA
 Type of Inspection: Annual Re-inspection Complaint
 Consent given by: MIKE EASTERBROOK, ENV. COMPLIANCE DIRECTOR Time: 1:06 PM

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Note: Citations that start with the number "66" are to the California Code of Regulations (CCR), title 22, division 4.5. Citations that start with the number "42" are to the Public Resources Code, division 30, part 3, chapter 8.5.

REGULATED FACILITIES AND WASTES

This checklist applies to large quantity handlers of UW electronic devices. "Large Quantity Handler of Universal Waste" is defined as a universal waste handler who accumulates 5,000 kilograms or more total of universal waste (e.g., batteries, thermostats, lamps, etc. calculated collectively) at any time. This designation as a large quantity handler of universal waste is retained through the end of the calendar year in which 5,000 kilograms or more total of universal waste is accumulated. [66273.9]

An electronic device that is listed in California Code of Regulations, Title 22, section 66260.201, subdivision (c) of Appendix X to Chapter 11 shall be managed as a "covered electronic device" under chapter 8.5 of part 3 of division 30 of the Public Resources Code (section 42460 et seq.) unless the manufacturer of the device has obtained the DTSC's concurrence that the device is non hazardous pursuant to subsection (c). [66260.201]

Examples of electronic devices that shall be managed as a "covered electronic device" include, but are not limited to the following: Computers, computer peripherals, telephones, answering machines, radios, stereo equipment, tape players/recorders, phonographs, video cassette players/recorders, compact disc players/recorders, calculators, and some appliances. [66273.9]

Check box if violation: (if checked see attached SOV)

PROHIBITIONS	
<input type="checkbox"/>	Disposed of UW [66273.31(a)]
<input type="checkbox"/>	Diluted or treated universal waste, except by responding to releases as provided in section 66273.37; or by managing specific wastes as provided in section 66273.33. [66273.31(b)]
WASTE MANAGEMENT	
Containment	
<input type="checkbox"/>	Failed to handle any UW electronic devices in a manner that minimizes breakage. [66273.33(d)(1)(A)]
<input type="checkbox"/>	Failed to store (e.g., in containers) UW electronic devices or manage (e.g., stored in a room) whole UW electronic devices in a manner that could reasonably prevent leakage, spillage, damage, or breakage resulting in a release of hazardous components contained within the device. [66273.33(d)(1)(A)]
<input type="checkbox"/>	Failed to immediately clean up and place in a container any UW electronic device that is broken and may reasonably be expected to cause a release of hazardous constituents to the environment. [66273.33(d)(1)(B)]
<input type="checkbox"/>	Failed to ensure that containers used to store broken UW electronic devices that may reasonably be expected to cause a release of hazardous constituents to the environment are structurally sound, compatible with the contents of the universal waste electronic devices, and prevent leakage or releases of hazardous components to the environment under reasonably foreseeable conditions. [66273.33(d)(1)(B)]
Notification and Reporting Requirements	
<input type="checkbox"/>	Failed to send written notification of universal waste management to the Regional Administrator, and receive an EPA Identification Number, before meeting or exceeding the 5,000 kilogram accumulation limit. [66273.32(a)(1)] Note: However, a large quantity handler of universal waste would <u>not</u> be required to notify U.S. EPA and obtain an EPA ID Number if the total quantity of all universal wastes handled (minus the universal waste electronic devices) does not meet or exceed the 5,000 Kg accumulation limit, <u>and</u> the large quantity handler has submitted the applicable notifications specified in this Article, <u>and</u> the large quantity handler ensures that all universal waste electronic devices handled are managed and recycled in accordance with this Article. [66273.32(a)(3)(A),(B) & (C)]

<input type="checkbox"/>	Failed to submit a complete notification [66273.32(b)]
<input type="checkbox"/>	Failed to notify DTSC within 30 days prior of accepting any UW electronic devices from an off-site source after August 6, 2004. [66273.33(d)(2)(A)]
<input type="checkbox"/>	Failed to notify DTSC prior to July 7, 2004, if LQH currently handling UW electronic devices from offsite sources. [66273.33(d)(2)(A)]
<input type="checkbox"/>	Submitted an incomplete notification. [66273.33(d)(2)(A)]
<input type="checkbox"/>	Failed to submit an annual report to DTSC if LQH of UW accepts > 100 kilograms or 220 pounds of UW electronic devices from any off-site source. [66273.33(d)(2)(B)]
<input type="checkbox"/>	Failed to submit a complete report to DTSC by February 1 covering the previous calendar year, commencing February 1, 2005. [66273.33(d)(2)(B)]
<input type="checkbox"/>	Failed to submit electronic notifications and reports to www.dtsc.ca.gov . [66273.33(d)(2)(C)]
<input type="checkbox"/>	Failed to submit written notifications and reports to DTSC by certified mail, return receipt. [66273.33(d)(2)(A)] & [66273.33(d)(2)(D)]
LQH Standards (Note: the following are four separate categories or levels of reclamation that could occur at the LQH facility. "A" contains the least amount of reclamation and "D" the most reclamation. Each category or level will require the LQH to meet different standards. Standards for each category or level are provided below.)	
A.	Removal of any discrete assemblies which are typically removed during the normal operation of the universal waste electronic device (e.g. batteries or ink cartridges) provided the disassembly is conducted in the manner prescribed in the operating manual for the universal waste electronic device or that would otherwise be performed during the normal use of the universal waste electronic device. [66273.33(d)(3)(A)]
B.	Reclamation of components (e.g., circuit boards, integrated circuits, metals, plastic, wiring, batteries, lamps, etc.) through manual disassembly, dismantling, or otherwise manually segregating components for the purposes of directly reusing those components onsite without further processing, or sending those components offsite for direct reuse or further reclamation at another location. [66273.33(d)(3)(B)]

C.	Recycling through the utilization of treatment processes other than manual disassembly for the purposes of directly reusing components onsite without further processing, sending components offsite for direct reuse, or sending components or treatment residuals offsite for further reclamation at another location, and whose recycling or treatment activities produces only hazardous residuals (including finely divided materials) that meet the definition of scrap metal in 66260.10, or which are otherwise exempt from full regulation as hazardous waste. [66273.33(d)(3)(C)]
D.	Recycling through the utilization of treatment processes other than manual disassembly for the purposes of directly reusing components onsite without further processing, sending components offsite for direct reuse, or sending components or treatment residuals offsite for further reclamation at another location, and whose recycling or treatment processes produce any residuals (including bag house and filter dusts) which exhibit any hazardous waste characteristic defined in chapter 11 and do not meet the definition of scrap metal in section 66260.10 (e.g., because they are fine powders or are contaminated with fine powders), or do not qualify for management as universal waste under this chapter. [66273.33(d)(3)(D)]
Treatment or Recycler Standards for LQHs, [that reclaim per (B), (C), or (D) above]	
<input type="checkbox"/>	Failed to notify DTSC no later than 30 days prior to treating or recycling any universal waste electronic devices after August 6, 2004. [66273.33(d)(3)(F)(1)(a)]
<input type="checkbox"/>	Failed to notify DTSC prior to July 7, 2004, if LQH currently treats or recycles UW electronic devices. [66273.33(d)(3)(F)(1)(a)]
<input type="checkbox"/>	Failed to submit a written notification by certified mail, return receipt. [66273.33(d)(3)(F)(1)(a)]
<input type="checkbox"/>	Submitted an incomplete notification. [66273.33(d)(3)(F)(1)(a)]
<input type="checkbox"/>	Failed to prepare and submit an annual report to DTSC. [66273.33(d)(3)(F)(1)(b)]
<input type="checkbox"/>	Failed to submit the annual report by certified mail, return receipt to DTSC by February 1 of each calendar year covering the previous calendar year. [66273.33(d)(3)(F)(1)(b)]
<input type="checkbox"/>	Failed to date and sign the annual report according to the requirements of section 66270.11. [66273.33(d)(3)(F)(1)(b)]
<input type="checkbox"/>	Failed to submit a complete annual report. [66273.33(d)(3)(F)(1)(b)]

Containment of Residuals [per (B), (C), or (D) above]	
<input type="checkbox"/>	Failed to manage all materials produced from the treatment of UW electronic devices in a manner that prevents a release. [66273.33(d)(3)(F)(2)]
<input type="checkbox"/>	Failed to conduct treatment activities over, or in a containment device of sufficient in size and construction. [66273.33(d)(3)(F)(2)(a)]
<input type="checkbox"/>	Failed to contain any residuals in a manner that minimizes breakage and prevents leakage, spillage or damage. [66273.33(d)(3)(F)(2)(b)]
<input type="checkbox"/>	Failed to immediately clean up and place in a container any UW electronic device that is broken and may reasonably be expected to cause a release. [66273.33(d)(3)(F)(2)(c)]
Worker Safety [per (B), (C), or (D) above]	
<input type="checkbox"/>	Failed to be familiar with the hazards associated with UW electronic device treatment activities. [66273.33(d)(3)(F)(3)(a)]
<input type="checkbox"/>	Failed to have access to the proper procedures and protective equipment necessary to safely conduct UW electronic device treatment activities and to comply with the requirements of this section. [66273.33(d)(3)(F)(3)(a)]
<input type="checkbox"/>	Failed to ensure that the facility is operated in compliance with all applicable worker health and safety laws and regulations (i.e., California Code of Regulations, title 8). [66273.33(d)(3)(F)(2)(b)]
Zoning [per (B), (C), or (D) above]	
<input type="checkbox"/>	Failed to ensure that the treatment activities conducted at the facility are consistent with local zoning and land use requirements for that location. [66273.33(d)(3)(F)(4)]
Management of Residuals [per (B), (C), or (D) above]	
<input checked="" type="checkbox"/>	Failed to ensure that all materials produced as a result of the treatment processes are properly classified and managed in accordance with any applicable requirements of this division. [66273.33(d)(3)(F)(5)]
Management Standards [per (C), or (D) above]	
<input type="checkbox"/>	Failed to use only treatment methods that employ one or more of the following technologies: [66273.33(d)(3)(F)(6)(a)] Physical processes that change only the physical properties of the waste such as cutting, sawing, breaking, shredding, crushing, grinding, screening, sieving, acceleration, or compacting; [66273.33(d)(3)(F)(6)(a)(1)] AND/OR Separation based on differences in physical properties such as size, color, density, or ferromagnetism. [66273.33(d)(3)(F)(6)(a)(2)]

<input type="checkbox"/>	Failed to ensure all mercury containing lamps and other components which contain fluids (i.e., liquids or gasses) that would be identified as hazardous waste were removed prior to processing. [66273.33(d)(3)(F)(6)(a)(3)]
<input type="checkbox"/>	Allowed processing of universal waste electronic devices containing PCB ballasts, medical or bio-hazardous wastes, radioactive materials, reactive materials, or ignitable materials. [66273.33(d)(3)(F)(6)(a)(4)]
<input type="checkbox"/>	Failed to ensure the treatment is conducted without the use or application of: [66273.33(d)(3)(F)(6)(b)] Chemicals, including water; [66273.33(d)(3)(F)(6)(b)(1)] External heat. [66273.13(d)(3)(F)(6)(b)(2)]
<input checked="" type="checkbox"/>	Failed to ensure that all hazardous wastes generated from treatment activities that are sent offsite for disposal are manifested. [66273.33(d)(3)(F)(6)(c)] <i>Hepa Filter</i>
<input type="checkbox"/>	Failed to ensure that all treatment residuals meeting the definition of scrap metal in section 66260.10 are recycled. [66273.33(d)(3)(F)(6)(d)]
<input type="checkbox"/>	Accept for treatment, any universal waste electronic devices that are managed, or are required to be managed, as hazardous waste under chapters 10 through 22 of this division unless authorized to do so under hazardous waste management permit or other grant of authorization. [66273.33(d)(3)(F)(6)(e)]
<input type="checkbox"/>	Failed to comply with the requirements of sections 66265.18 and 66265.25 of chapter 15 as those requirements apply to facility location and design standards. [66273.33(d)(3)(F)(6)(f)]
<input type="checkbox"/>	Failed to ensure that all treatment is conducted in compliance with all applicable local and state air pollution control laws and regulations. [66273.33(d)(3)(F)(6)(g)]
<input type="checkbox"/>	Failed to conduct treatment only for the purposes of recycling one or more types of universal waste electronic devices. [66273.33(d)(3)(F)(6)(h)]
<input type="checkbox"/>	Failed to maintain on file copies of the most recent notifications and reports submitted to DTSC and a copy of any local air district permit and other permits required for the facility no later than 30 days prior to recycling or treating any UW waste electronic devices. [66273.33(d)(3)(F)(6)(i)]
<input type="checkbox"/>	Failed to make documents available to any representative of DTSC, the U. S. EPA, or a local governmental agency. [66273.33(d)(3)(F)(6)(i)]

<input type="checkbox"/>	Failed to deliver documents by person or by certified mail, return receipt requested, to DTSC when requested in writing. [66273.33(d)(3)(F)(6)(i)]
<input type="checkbox"/>	Failed to submit a written notification to DTSC no later than 30 days after ceasing treatment or recycling activities at the facility. [66273.33(d)(3)(F)(6)(j)]
<input type="checkbox"/>	Failed to submit a written notification to DTSC by certified mail, return receipt. [66273.33(d)(3)(F)(6)(j)]
<input type="checkbox"/>	Submitted an incomplete notification. [66273.33(d)(3)(F)(6)(j)]
Treatment Standards [per (D) above]	
<input type="checkbox"/>	Failed to prepare and submit to DTSC a written estimate of a cost for closure no later than 30 days prior to initially recycling or treating any universal waste electronic devices. [66273.33(d)(3)(F)(7)]
<input type="checkbox"/>	Failed to submit a written estimate of the facility closure cost by certified mail, return receipt. [66273.33(d)(3)(F)(7)(a)]
#3 <input checked="" type="checkbox"/>	Submitted an incomplete closure cost estimate pursuant to the requirements specified in section 66265.142. [66273.33(d)(3)(F)(7)(a)]
<input type="checkbox"/>	Failed to evaluate, and adjust if necessary, the closure cost estimate annually to reflect changes in closing cost. [66273.33(d)(3)(F)(7)(a)]
<input type="checkbox"/>	Failed to submit to DTSC written documentation demonstrating financial assurance for closure no later than 30 days prior to initially recycling or treating any universal waste electronic devices [66273.33(d)(3)(F)(7)(b)]
<input type="checkbox"/>	Failed to submit written documentation demonstrating financial assurance for closure by certified mail, return receipt. [66273.33(d)(3)(F)(7)(b)]
<input type="checkbox"/>	Submitted incomplete documentation demonstrating financial assurance for closure pursuant to section 66265.143. [66273.33(d)(3)(F)(7)(b)]
<input type="checkbox"/>	Failed to submit to DTSC documentation demonstrating financial responsibility for liability no later than 30 days prior to initially recycling or treating any universal waste electronic devices [66273.33(d)(3)(F)(7)(c)]
<input type="checkbox"/>	Failed to submit documentation demonstrating financial responsibility for liability by certified mail, return receipt. [66273.33(d)(3)(F)(7)(c)]

<input type="checkbox"/>	Submitted complete documentation demonstrating financial responsibility for liability pursuant to section 66265.147. [66273.33(d)(3)(F)(7)(c)]
LABELING/MARKING	
<input type="checkbox"/>	Failed to properly label or clearly mark each container or pallet in or on which UW electronic devices are contained, including containers or pallets that also contain devices with one of the following phrases: "Universal Waste—Consumer Electronic Device(s)" or "UW—Consumer Electronic Device(s)." [66273.34(d)]
AND	
<input type="checkbox"/>	Failed to accumulate universal waste electronic devices within a designated area demarcated by boundaries that are clearly labeled. [66273.34(d)(1)]
ACCUMULATION TIME LIMITS	
<input type="checkbox"/>	Accumulated universal waste for longer than one year from the date the universal waste is generated, or received from another handler, unless the requirements of subsection (b) of these sections are met. [66273.35]
<input type="checkbox"/>	Failed to mark or label the length of time that the universal waste has been accumulated from the date it becomes a waste or is received. [66273.35(c)]
OR	
<input type="checkbox"/>	Failed to maintain an inventory system on-site that identifies the date each universal waste became a waste or was received. [66273.35(c)(1)&(2)]
OR	
<input type="checkbox"/>	Failed to maintain an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers of universal waste became a waste or was received. [66273.35(c)(3)&(4)]
OR	
<input type="checkbox"/>	Failed to place UW in a specific accumulation area and identifying the earliest date that any universal waste in the area became a waste or was received. [66273.35(c)(5)]
EMPLOYEE TRAINING	
<input type="checkbox"/>	Failed to provide training to ensure that all employees who handle or have responsibility for managing universal waste are thoroughly familiar with proper waste handling and emergency procedures, relative to their responsibilities during normal facility operations and emergencies. [66273.36]

RESPONSE TO RELEASE	
<input type="checkbox"/>	Failed to immediately contain all releases of universal wastes and other residues from universal wastes. [66273.37(a)]
<input type="checkbox"/>	Failed to determine whether any material resulting from the release is hazardous waste, and if so, manage the hazardous waste in compliance with all applicable requirements of this division. [66273.37(b)]
	Failed to properly repackage waste consisting only of residues of leaking, broken, or otherwise damaged universal waste. [66273.37(c)]
OFF-SITE SHIPMENTS	
<input type="checkbox"/>	Sent or delivered UW to a place other than another UW handler, a destination facility, or a foreign destination. [66273.18(a)]
<input type="checkbox"/>	Failed to comply with transporter requirements while self-transporting the universal waste. [66273.38(b)]
<input type="checkbox"/>	Failed to package, label, mark and placard the shipment, and prepare the proper shipping papers for UW offered for off-site transportation that meets the definition of hazardous materials under 49 CFR parts 171 through 180. [66273.38(c)]
<input type="checkbox"/>	Failure to ensure that the receiving handler agrees to receive the shipment from the originating handler prior to sending a shipment. [66273.38(d)]
<input type="checkbox"/>	Failure to either receive the UW back, or agree with the receiving handler on a destination facility to which the shipment will be sent, if the UW is rejected by the receiving handler or destination facility. [66273.38(e)(1)&(2)]
<input type="checkbox"/>	Failed to notify the originating handler to discuss reshipment, if the receiving handler rejects a shipment containing UW, or a portion of a shipment containing UW. [66273.38(f)(1)&(2)]
<input type="checkbox"/>	Failed to immediately notify DTSC of the illegal shipment, and provide the name, address, and phone number of the originating shipper if the facility receives a shipment containing hazardous waste that is not a universal waste. [66273.38(g)]
TRACKING UW SHIPMENTS	
<input type="checkbox"/>	Failed to keep a record of each shipment of universal waste <u>received</u> at the facility. [66273.39(a)]
<i>Failed to record any of the following information:</i>	
<input type="checkbox"/>	The name and address of the originating universal waste handler or foreign shipper from whom the universal waste was sent; [66273.39(a)(1)]

<input type="checkbox"/>	The quantity of each type of universal waste received (e.g., batteries, thermostats, lamps, mercury switches, etc.); [66273.39(a)(2)]
<input type="checkbox"/>	The date of receipt of the shipment of universal waste. [66273.39(a)(3)]
<input type="checkbox"/>	Failed to keep a record of each shipment of universal waste <u>sent</u> from the handler to off-site facilities. [66273.39(b)]
<i>Failed to record any of the following information:</i>	
<input type="checkbox"/>	The name and address of the universal waste handler, destination facility, or foreign destination to whom the universal waste was sent; [66273.39(b)(1)]
<input type="checkbox"/>	The quantity of each type of universal waste sent (e.g., batteries, thermostats, lamps, mercury switches, etc.); [66273.39(b)(2)]
<input type="checkbox"/>	The date the shipment of universal waste left the facility. [66273.39(b)(3)]
<input type="checkbox"/>	Failed to retain the records described in subsection (a) of this section for at least three years from the date of receipt of a shipment of universal waste; [66273.39(c)(1)]
<input type="checkbox"/>	Failed to retain the records described in subsection (b) of this section for at least three years from the date a shipment of universal waste left the facility. [66273.39(c)(2)]
EXPORT	
<input type="checkbox"/>	Failed to comply with the requirements applicable to a primary exporter in section 66262.53, 66262.56(a) (1) through (4), (6), and (b) and 66262.57; [66273.40(a)] [Note: Export to OECD countries specified in section 66262.58(a)(1) are subject to the requirements of article 8 of chapter 12]
AND	
<input type="checkbox"/>	Failed to obtain the consent of the receiving country and in conformance with the EPA Acknowledgement of Consent as defined in article 5 of chapter 12; and [66273.40(b)]
AND	
<input type="checkbox"/>	Failed to provide a copy of the EPA Acknowledgment of Consent for the shipment to the transporter transporting the shipment for export. [66273.40(c)]
<input type="checkbox"/>	Failed to notify DTSC and concurrently send a copy of that notification to the CUPA of an intended export before such consumer electronic device is scheduled to leave the United States. A completed notification shall be submitted four weeks before the initial shipment is intended to be shipped offsite. This notification shall cover export activities extending over a twelve (12) month or lesser period. [66273.40(d)]

Failed to include all of the following information: [66273.40(e)]	
<input type="checkbox"/>	Name, mailing address, and telephone number of the universal waste handler; [66273.40(e)(1)]
<input type="checkbox"/>	The foreign destination, for each type of consumer electronic device; [66273.40(e)(2)]
<input type="checkbox"/>	The amount of consumer electronic devices (by count or by weight); [66273.40(e)(2)(A)]
<input type="checkbox"/>	The estimated frequency or rate at which the consumer electronic device is to be exported and the period of time over which the consumer electronic device is to be exported; [66273.40(e)(2)(B)]
<input type="checkbox"/>	All points of entry to and departure from each foreign country through which the consumer electronic device will pass; [66273.40(e)(2)(C)]
<input type="checkbox"/>	A description of the means by which each shipment of consumer electronic devices will be recycled at the foreign destination; and [66273.40(e)(2)(D)]
<input type="checkbox"/>	The name and site address of the consignee or any alternate consignee. [66273.40(e)(2)(E)]
<input type="checkbox"/>	Failed to send the notifications submitted under subsection (d) of this section to DTSC, Hazardous Waste Management Program, State Regulatory Programs Division, P.O. Box 806, Sacramento, CA 95812-0806, with "Attention: Notification to Export Consumer Electronic Devices" prominently displayed on the front of the envelope. [66273.40(f)]

COMMENTS:

NOTE: The inspector shall also note in this section a description of all violations that were observed and corrected during the inspection.

Other: Lead Acid Batteries

Cathode Ray Tube (CRT) Material Handler (MH) Inspection Report

Facility Name: ARC INTERNATIONAL CORP.
 Identification Number: CAL 000315696
 Facility Address: 333 TURNBULL CANYON ROAD
CITY OF INDUSTRY, CA 91744
 Date Inspected: MARCH 26, 2008
 Inspected By: ELLEN PATES and TOLLU AWOLIKA
 Type of Inspection: Annual Re-inspection Complaint
 Consent given by: MIKE EASTERBROOK, ENV. COMPLIANCE DIRECTOR Time: 1:00 PM

DISCLAIMER

This checklist is intended to provide guidance only. This checklist does not replace or supersede relevant statutes and regulations. The information contained in this checklist is based upon the statutes and regulations in effect as of the date the checklist was signed. Interested parties are advised to keep apprised of subsequent changes to relevant statutes and regulations.

Citations that start with the number "66" are to the California Code of Regulations (CCR), title 22, division 4.5. Citations that start with the number "42" are to the Public Resources Code, division 30, part 3, chapter 8.5.

If the CRT Recycler is a permitted Hazardous Waste (HW) Facility, the inspector shall contact DTSC staff responsible for maintaining that facility's permit to determine if additional requirements apply to CRT activities carried out at the facility.

REGULATED WASTES

CRTs (AKA covered electronic devices) are defined as a cathode ray tube, cathode ray tube device, flat panel screen, or any other similar video display device with a screen size that is greater than four inches in size measured diagonally and which the DTSC determines, when discarded or disposed, would be a hazardous waste pursuant to Chapter 6.5 (commencing with Section 25100) of Division 20 of the Health and Safety Code. [42463(f)(1)]

Check box if violation: (if checked see attached SOV)

PROHIBITIONS	
<input type="checkbox"/>	Disposed of a CRT material. [66273.81(a)]
<input type="checkbox"/>	Diluted or treated a CRT material unless requirements of this section are met. [66273.81(b)]
NOTIFICATION & ANNUAL REPORT	
<input type="checkbox"/>	Failed to notify DTSC at least 30 days prior to accepting any CRT materials from an offsite source. [66273.82(a)]
<input type="checkbox"/>	Failed to submit an annual report to DTSC, if CRT MH accepted >5 CRTs, >5 CRT devices, or >100 kg of CRT glass per calendar year from any offsite source. [66273.82(b)(2)]
<input type="checkbox"/>	Failed to submit annual report to DTSC, if CRT MH generates ≥5,000 kg of CRT material per calendar year. [66273.82(b)(3)]
<input type="checkbox"/>	Failed to submit written annual report to DTSC by February 1 of each calendar year. [66273.82(b)]
<input type="checkbox"/>	Submitted an incomplete notification or annual report. [66273.82(a) & (b)(4)]
<input type="checkbox"/>	A CRT MH who performs data conversions derived from mass data failed to include the conversion factor(s) in the annual report. [66273.82(c)]
<input type="checkbox"/>	Failed to submit a written notification or annual report by certified mail, return receipt. [66273.82(d)]

WASTE MANAGEMENT	
<input type="checkbox"/>	Failed to contain any CRT materials in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the container. [66273.83(a)(1)]
<input type="checkbox"/>	Failed to immediately clean up and place in a container any CRT material that is broken or shows evidence of breakage, leakage, or damage. [66273.83(a)(2)]
<input type="checkbox"/>	Failed to safely remove CRTs from CRT devices. [66273.83(b)(1)]
<input type="checkbox"/>	Failed to determine whether any of the remaining portions of the CRT device or any other waste generated during the removal process exhibits any characteristic of a HW. [66273.83(b)(2)]
YOKE REMOVAL	
<input type="checkbox"/>	Failed to remove yoke without breaking CRT glass and MH does not meet treatment/recycling standards. [66273.83(c)(1)]
<input type="checkbox"/>	Failed to submit complete notification by certified mail regarding yoke removal. [66273.83(c)(2)]
<input type="checkbox"/>	Failed to maintain notification, air permit and other permits (as required), and produce these documents when requested. [66273.83(c)(3)]

<input type="checkbox"/>	Failed to submit the annual report to DTSC by February 1 of each calendar year and by certified mail. [66273.83(c)(4)]
<input type="checkbox"/>	Accepted CRTs or CRT devices that are managed, or are required to be managed as hazardous waste. [66273.83(c)(5)]
<input type="checkbox"/>	Failed to conduct treatment for the purpose of recycling the CRTs or CRT devices. [66273.83(c)(6)]
<input type="checkbox"/>	Failed to ensure all treatment is conducted over or in a containment device sufficient in size and construction to contain any CRT glass that may be released during yoke removal. [66273.83(c)(7)]
<input type="checkbox"/>	Failed to utilize only mechanical methods to remove the yoke. [66273.83(c)(8)]
<input type="checkbox"/>	Used heat, chemicals, or water in yoke removal process. [66273.83(c)(9)]
<input type="checkbox"/>	Failed to ensure that all persons that perform treatment are thoroughly familiar with hazards and have access to proper procedures and protective equipment necessary to safely conduct treatment and to comply with applicable requirements. [66273.83(c)(10)]
<input type="checkbox"/>	Failed to ensure that the facility is operated in compliance with all applicable local and state air pollution control laws and regulations. [66273.83(c)(11)]
<input type="checkbox"/>	Failed to ensure that the facility is operated in compliance with all applicable worker health and safety laws and regulations. [66273.83(c)(12)]
<input type="checkbox"/>	Failed to ensure that all materials generated as a result of the treatment processes are classified and managed properly. [66273.83(c)(13)]
<input type="checkbox"/>	Failed to ensure that the activities conducted at the facility are consistent with local zoning or land use requirements. [66273.83(c)(14)]
<input type="checkbox"/>	Failed to maintain compliance with location, seismic, and precipitation design standards requirements. [66273.83(c)(15)]
CRT TREATMENT OR RECYCLING	
<input type="checkbox"/>	Failed to notify DTSC no later than 30 days prior to treating or recycling the CRT material. [66273.83(d)(1)(A)(1)]
<input type="checkbox"/>	Failed to notify DTSC no later than 30 days prior to ceasing treatment or recycling activities. [66273.83(d)(1)(A)3]
<input type="checkbox"/>	Failed to notify the DTSC no later than 30 days after ceasing treatment or recycling activities. [66273.83(d)(1)(A)3]
<input type="checkbox"/>	Failed to complete notification and sign, and date notification as specified in title 22 CCR 66270.11. [66273.83(d)(1)(A)2, 4, 5 and 66273.83(d)(1)(B)]

<input checked="" type="checkbox"/>	Failed to submit to DTSC by certified mail a cost estimate for closure no later than 30 days prior to recycling or treating CRT materials. [66273.83(d)(2)]
<input type="checkbox"/>	Failed to submit to DTSC documentation demonstrating financial assurance for closure no later than 30 days prior to recycling or treating. [66273.83(d)(3)]
<input type="checkbox"/>	Failed to submit to DTSC documentation demonstrating financial responsibility for liability no later than 30 days prior to recycling or treating. [66273.83(d)(4)]
<input type="checkbox"/>	Failed to maintain on file the most recent notification and air permit (if required) and produce these records when requested. [66273.83(d)(5)]
<input type="checkbox"/>	Failed to prepare and submit an annual report to DTSC by February 1 of each calendar year. [66273.83(d)(6)]
<input type="checkbox"/>	Submitted an incomplete annual report. [66273.83(d)(6)]
<input type="checkbox"/>	Accepted any CRT material that is managed, or is required to be managed, as HW. [66273.83(d)(7)]
<input type="checkbox"/>	Conducted the treatment for the purpose of recycling one or more types of CRT glass and failed to reclaim the CRT glass at a CRT glass manufacturer or at a primary or secondary lead smelter. [66273.83(d)(8)]
<input type="checkbox"/>	Failed to ensure all treatment is conducted over or in a containment device sufficient in size and construction to contain any CRT glass that may be released. [66273.83(d)(9)]
<input type="checkbox"/>	Failed to utilize specified treatment methods [66273.83(d)(10)]
<input type="checkbox"/>	Conducted treatment using chemicals or external heat other than specified in regulation. [66273.83(d)(11)]
<input type="checkbox"/>	Failed to ensure that the facility is operated in compliance with all applicable local and state air pollution control laws and regulations. [66273.83(d)(13)]
<input type="checkbox"/>	Failed to ensure that the facility is operated in compliance with all applicable worker health and safety laws and regulations. [66273.83(d)(14)]
<input checked="" type="checkbox"/>	Failed to ensure that all materials generated as a result of the treatment processes are properly classified and managed. [66273.83(d)(15)] <i>Hepa Filter H.W.</i>
<input type="checkbox"/>	Failed to ensure that the activities conducted at the facility are consistent with local zoning or land use requirements. [66273.83(d)(16)]
<input type="checkbox"/>	Failed to maintain compliance with location standards and seismic and precipitation design standards requirements. [66273.83(d)(17)]

LABELING/MARKING	
<input type="checkbox"/>	Failed to properly label or clearly mark each container or pallet in or on which CRTs, CRT devices or CRT glass are contained. [66273.84]
<input type="checkbox"/>	Failed to properly label a designated area where CRTs and CRT devices are accumulated within demarcated boundaries. [66273.84)(d)]
<input type="checkbox"/>	Stored CRTs and CRT devices along with other materials in designated CRT accumulation areas. [66273.84)(d)]
ACCUMULATION TIME LIMITS	
<input type="checkbox"/>	Accumulated CRT material for more than one year from the date the universal waste (UW) is generated, or received from another handler. [66273.85(a)]
<input type="checkbox"/>	Failed to demonstrate the length of time that the UW has been accumulated from the date it became a waste or was received. [66273.85(b)]
EMPLOYEE TRAINING	
<input type="checkbox"/>	Failed to ensure that persons removing CRTs are thoroughly familiar with the techniques and safety precautions required to safely remove CRTs.[66273.83(b)(1)(C)]
<input type="checkbox"/>	Failed to ensure that all persons that perform treatment or recycling are thoroughly familiar with the associated hazards and have access to the proper procedures and protective equipment necessary to safely conduct the treatment. [66273.83(d)(12)]
<input type="checkbox"/>	Failed to inform all employees who handle or have responsibility for managing CRT material of the proper handling and emergency procedures. [66273.86(a)]
<input type="checkbox"/>	Employees who manage or handle waste CRT materials failed to receive specified initial training. [66273.86(b)]
<input type="checkbox"/>	Employees failed to take part in annual review of the initial training. [66273.86(c)]
RESPONSE TO RELEASES	
<input type="checkbox"/>	Failed to immediately contain all releases of CRT material and residues from CRT material. [66273.87(a)]
<input type="checkbox"/>	Failed to determine whether any material resulting from a release is a HW. [66273.87(b)]
<input type="checkbox"/>	Failed to manage any material determined to be HW as HW. [66273.87(b)]
<input type="checkbox"/>	Managed residues of leaking, broken, or damaged CRT material as UW without repackaging according to applicable standards. [66273.87(c)]

OFF-SITE SHIPMENTS	
<input type="checkbox"/>	Sent or took CRT material to a place other than another CRT MH, a destination facility, or a foreign destination. [66273.88(a)]
<input type="checkbox"/>	A CRT MH that transports CRT material off-site failed to comply with the UW transporter requirements. [66273.88(b)]
<input type="checkbox"/>	A CRT MH that offers CRT material that meets the definition of a hazardous material for off-site transportation failed to package, label, mark and placard the shipment according to applicable United States Department of Transportation (U.S DOT) regulations. [66273.88(c)]
<input type="checkbox"/>	The originating CRT MH failed to obtain an agreement from the receiving CRT MH prior to sending a shipment of CRT material. [66273.88(d)]
<input type="checkbox"/>	The originating CRT MH failed to follow rejected load procedures. [66273.88(e)]
<input type="checkbox"/>	The receiving CRT MH that rejects a shipment of CRT material failed to follow rejected load procedures. [66273.88(f)]
<input type="checkbox"/>	A CRT MH that receives a shipment of CRT material containing HW failed to notify DTSC of the shipment. [66273.88(g)]
<input type="checkbox"/>	A CRT MH that receives a shipment of non-hazardous, non-UW, failed to manage the waste in compliance with applicable federal, state, and local solid waste regulations. [66273.88(h)]
EXPORT	
<input type="checkbox"/>	Failed to notify DTSC four weeks before the intended initial shipment of CRT material to any foreign destination. [66273.90(a)]
<input type="checkbox"/>	Failed to notify CUPA of the intended export. [66273.90(a)]
<input type="checkbox"/>	Submitted an incomplete notification. [66273.90(b)]
<input type="checkbox"/>	Failed to notify the DTSC at least 60 days prior to export, the destination, contents, and volume of covered electronic waste (e-waste) to be exported to any foreign destination. [42476.5(a)]
<input type="checkbox"/>	Failed to demonstrate that the importation of covered e-waste is not prohibited by any applicable law or regulation of the country of destination and that any import is conducted in accordance with all applicable laws. [42476.5(b)]
<input type="checkbox"/>	Failed to forward required import and operating licenses to the DTSC. [42476.5(b)]

<input type="checkbox"/>	Failed to demonstrate that the exportation of covered e-waste is conducted only in accordance with applicable international law. [42476.5(c)]
<input type="checkbox"/>	Failed to demonstrate that the management of the exported covered e-waste will be handled within the country of destination in accordance with applicable rules, standards, and requirements adopted by the Organization for Economic Cooperation and Development (OECD) for the environmentally sound management of e-waste. [42476.5(d)]
<input type="checkbox"/>	Failed to demonstrate that the covered e-waste is being exported for the purpose of reuse or recycling. [42476.5(e)]
RECORDKEEPING	
<input type="checkbox"/>	Failed to maintain a copy of any local air district permits and other permits required for the facility no later than 30 days prior to recycling or treating any CRT material. [66273.83(d)(5)(B)]
<input type="checkbox"/>	Failed to maintain records of employee training received for at least three years from the date the employee last worked at the facility. [66273.86(d)]
<input type="checkbox"/>	Incomplete shipment record of CRT material received. [66273.89(a)]
<input type="checkbox"/>	Incomplete shipment record of CRT material sent. [66273.89(b)]

COMMENTS:

NOTE: The inspector shall also note in this section a description of all violations that were observed and corrected during the inspection.

Explained violation and left
a Summary of Violation



ARC International Corporation

Electronic Waste Recycling Plant Cleanup Plan



ARC International Corporation
333 Turnbull Canyon Rd.
City of Industry, CA 91745
Toll Free: 877.2.E.WASTE
Main: 626.855.8011 Fax: 626.855.8048

Mike Easterbrook
Environmental Compliance Director

direct: 626.606.1048
cellular: 310.221.1578
mikee@arcic.com

Electronic Waste Management™

www.arcic.com

Plant Location: 333 Turnbull Canyon Road, City of Industry, CA, 91745

Submitted: Tuesday, December 16, 2008

Table of Content

- I. Recycling Plant Overview
- II. Initial Cleaning Process
- III. Background/Preliminary Testing
- IV. Official Cleaning Process
- V. Clearance Testing
- VI. Lead Waste Treatment
- VII. Vendors list
- VIII. Appendixes

I. Recycling Plant Overview

ARC Turnbull recycling plant has been a primary electronic waste treatment facility in southern California since January 2007. The warehouse is approximately 130,000 Sq feet, which 80% of the total area has been used for E-waste recycling and 20% was used for non-E-Waste recycling activities (logistics Service).

E-waste recycling area is located in the southwest corner of the plant. It includes the loading docks, receiving area, dismantling area, e-waste crusher, and storage area. Under the current condition, those are the primary areas where detailed cleaning process will be taken place. The logistics area will be tested and when appropriate cleaned.

II. Initial Cleaning Process

ARC will conduct a preliminary cleanup by sweeping the floor and any larger residues that are not needed. The lead contaminated residuals will be sent to **Filter Recycling Service, INC.**, for proper disposal. The materials include leaded glass, contaminated wood, gloves, paper, etc.

The purpose of pre-cleaning process is to reduce the noticeable amount of dust on the ground in order to minimize any cross contamination on the equipment, receive an accurate background test result and facilitate the official cleanup process.

III. Background/ Preliminary Testing

The proposed wipe tests will be done by JC Environmental and AAA Lead. All monitoring samples taken will be based on Title 17, California Code of Regulations, Division 1, Chapter 8 Accreditation, Certification and Work Practices in Lead-Related Construction (effective March 30, 1998).

The testing result will determine the presence of lead level that may have accumulated from the recycling activities of crushing lead glass at ARC Turnbull recycling plant. The most common materials generally defined as lead dust are lead based compounds resulting from crushing of lead glass CRTs. Accordingly, the wipe samples should be analyzed for the presence of lead materials.

ARC has hired **AAA LEAD Consultants and Inspections, Inc. and JC Environmental**, to test the lead contamination level. This third party testing would be the determination for the type of cleaning necessary. Below are the proposed background testing procedures:

- 1) Visual assessment to determine locations and surfaces to be sampled
 - ✓ Wipe test sites are chosen in the immediate areas where the waste recycling

- operation was carried out in the past.
- ✓ Test sites on accessible horizontal surfaces in these areas are taken at intervals of at least fifteen to twenty feet apart, in an approximate square matrix fashion (similar to a cross word puzzle matrix), to cover an area encompassing the immediate waste recycle work area. AAA Lead will supply a map/grid of where testing will be done.
 - ✓ A total of about 15 to 20 wipe are initially planned at the E-waste recycle work areas to determine if a series of contamination problems exist at these sites.
 - ✓ Wipe samples are taken on a much larger square matrix through out the logistics and office area to identify possible distribution of waste related contamination through those areas.
 - ✓ Representative wipe test are taken in any suspect enclosed area.

2) Background wipe sampling interior and exterior

- ✓ Packaged, clean wipe swatches moistened with isopropyl alcohol solution (Clean Tex CT801 Wipe Pad or the equivalent) are used to remove extraneous surface deposits from representative facility and equipment surfaces.
- ✓ Use latex type of gloves to handle the wipe swatch
- ✓ Wipe test locations are chosen on surfaces showing no signs of recent clean-up in order to accurately determine normal background contamination levels.
- ✓ Wipe a surface area of minimum approximately 100 square cm. Create a grid on the facility map to record the testing site.
- ✓ Refold the wipe swatch to present a clean wipe swatch surface for each repeated wipe pass on the selected test site.
- ✓ Replace each wipe swatch in a numbered container. Record wipe test area, location, date and sample number after each wipe test.
- ✓ Submit a reference unused "blank" sample with each series of wipe tests.
- ✓ Horizontal wipe test surfaces are preferred to serve as "worst case" examples for accumulated nuisance dust deposits.
- ✓ All monitoring samples taken will be based on Title 17, California Code of Regulations, Division 1, Chapter 8 Accreditation, Certification and Work Practices in Lead-Related Construction (effective March 30, 1998).

3) Background wiper sampling interior and exterior as per DHS standards.

4) Complete Reports including all test results at completion of project

- ✓ The wipe test results are compared against acceptable reference levels for "hazardous materials" that are in place at Integrated Waste Management Board and/or mandated by the State of California.

5) Certified clean up will be documented by AAA Lead when wipe samples show the ARC Turnbull location is clean.

- 6) Data interpretation will be done by AAA Lead and a report will be provided to DTSC.
- 7) Documentation will be done by AAA Lead and will be provided to DTSC.

IV. Lead Remediation Cleaning Process

ARC will perform the cleaning of the facility, as well as the machinery and electrical equipment.

1) Facility Cleaning Methods

✓ Dry Cleaning Method:

Vertical and horizontal surfaces to be cleaned will be HEPA vacuumed, followed by wiping with an absorbent sponge. Surfaces include the ceilings, walls, bar joists, I-beams, pipes, and exterior to any duct work, cat walks, stairways, conduit, overhead cranes and tracks, and any fixtures that may be attached to any mentioned surfaces.

When required, areas will be accessed by utilizing scissor lifts, boom lifts, and ladders.

✓ Wet Cleaning Method:

Dry cleaning procedures mentioned above may be performed first. Then, all the surfaces will be pressure washed to ensure a higher level of lead removal to become clean. The hazardous water will be deposit into a sealed poly tank for temporary storage, and when possible be allowed to sit to allow for evaporation. Bilge pumps, Sump pumps, or wet vacuum will be used to transfer the water; blue absorbent socks and Visqueen drape barriers will be used to shield the working area and restrain hazardous water within certain parameter.

While the surfaces are still moist, a heavy-duty degreaser may be applied to all surfaces by using hand held spray bottles. The degreaser would then be rinsed off and wiped using lint free terry cloth towels. The hazardous waster will be properly stored in the poly tank and cloth towels will be stored in Gaylord box with covers for temporary storage.

Finally, all floors may be dry and wet cleaned. Dry cleaning will consist of a HEPA vacuum to suck in and seal the hazardous dust. Followed by automatic sweeper brushing the floor with the lead-specific detergent, all floors then will be rinsed with clean waster and mopped. For mopping, a three bucket method may be used. Squeegees may be used to collect the water in one area. At the end, fan or blowers are used to dry out the floors.

2) Machinery and Electrical Equipment Cleaning Method

- ✓ There are four units to be cleaned. Two are located inside the building, and two outside.
- ✓ The crusher is a shipping container that has been modified with the additions of a grinder and various holes (approximately 7, varies depending on unit).
- ✓ Crusher Unit will be tested on four outside walls for lead levels using a swipe test (Please see Section III for testing detail). Samples would be sent to **Enviro-Chem Laboratories, Inc.** or equivalent services. The samples will be taken from the center of each wall, with the unit having four walls. The actual locations may be modified by AAA Lead during testing since they have not seen the unit before testing. If any location is modified, the new location will be documented and DTSC will be notified.
- ✓ Pictures will be taken before the cleaning process.
- ✓ Dry cleaning method is applied by using Hepa Vacuum to suck in and seal the hazardous dust.
- ✓ Aqueous based detergents, solvent based and water displacement alcohols are applied to crusher by spraying.
- ✓ Crusher Unit outside will be wiped down to insure the crusher is cleaned.
- ✓ Wipes would be put into a Gaylord Box, sealed, and sent to Filter Recycling Service INC., or equivalent service.
- ✓ Crusher Unit will be cleaned one more time with water.
- ✓ Fan and blower are used to dry the machine.
- ✓ Once unit has been cleaned, samples will be taken at approximately where the initial samples are taken before cleaning.
- ✓ Sample will be sent to Enviro-Chem Laboratories, Inc or equivalent again for clearance test. Test report will be used to determine further action.
- ✓ Re-clean if needed and re-test till acceptable results achieved.
- ✓ The other 3 units would then be cleaned after success with the first unit.

3) Equipment List

Item	Estimated Quantity
Scissor Lift	4
Fork Lift	4
Safety Harness	20
Hot Water Pressure Washer	4
Bilge Pumps	4
Drape Barrier	10
Hoses	5

Blue Absorbent Socks	6
Floor Scrubber/ Sweeper	1
Ledicolv Lead-Specific Detergent (55 Gallon)	5
Hepa Vacuums	4
Water Tank (630 Gallon)	1
Gaylord Box	50
Shrink-wrap Rolls	4
Fan/Blower	4
Mops	15
Squeegee	3

V. Clearance Testing

Prior to the cleanup, background sample will be taken and used as determination for cleaning procedure and initial data. After cleaning, clearance samples are taken at sites where initial sample was so that ARC is able to conclude cleaning process was successful and Turnbull facility has reached the acceptable lead level. If the certain clearance test failed, ARC will re-clean and retest until the acceptable standard achieved.

VI. Lead Waste Treatment

Lead residuals generated during the cleaning process including: lead water, lead cleaning wrap, lead shrank-wrap, lead container, lead glove, etc will be stored in Gaylord boxes and sent to **Filter Recycling Service, INC.**, for proper disposal.

VII. Vendor List

1. **Filter Recycling Service Inc.**, 2230 Riverside Avenue, Rialto, CA 92316, 1-800-698-4377, www.filterrecycling.com, EPA ID: CAD982444481
2. **AAA Lead Consultants and Inspections**, 1307 West Sixth Street #134, Corona, CA, 92882, 951- 582-9071, <http://www.aaalead.net>, EPA Certificate #I0024 Lead Inspector Training , EPA Certificate #S0167 Lead Abatement Training for Supervisors and Contractors
3. **Enviro-Chem, Laboratories, Inc**, 1214 East Lexington Avenue, Pomona, CA 91766 <http://www.enviro-chemlab.com/>, CAL-DHS ELAP Certification No. 1555

State of California - California Environmental Protection Agency

Department of Toxic Substances Control

Notice of Intent to Handle and/or Treat or Recycle Universal Waste Electronic Devices (UWEDs) and/or Cathode Ray Tube (CRT) Materials

A. Handler or Recycler Information. Please fill in the information requested below.

Facility Name ARC International Corporation Phone (626) 855-8011
Physical Address 333 Turnbull Canyon Rd. City of Industry LA CA 91745
Mailing Address 680 S. Lemon Ave. Walnut LA CA 91789
Contact Person (Name/Title) Sunny Young / COO Phone (626) 855-8011
Mailing Address 680 S. Lemon Ave. Walnut LA CA 91789
Facility Owner Jay Hooper Phone (626) 855-8011
Mailing Address 680 S. Lemon Ave. Walnut LA CA 91789
E-Mail address information@arcic.com (If available)
EPA ID Number CAL000215696 / CAR000180257 (If applicable)

B. Proposed Activities [Please check the box(es) that describes the source(s) of the materials you will collect. Please check the box(es) that describes the types of materials you will collect. Check all applicable boxes.

Materials Accepted From:
[X] Businesses
[X] Households
[X] Government agencies
[X] Other collectors
[X] Other please specify Schools
Materials to Be Handled (Check all that apply)
[X] CRT Materials
[X] UWEDs

C. Export Information. Intend to export, please refer to the requirements found in 22 CCR sections 68273.20 (small quantity handler), and/or 68273.40 (large quantity handler), and/or 68273.80 (CRT material handler). Please provide the following information

U.S. POSTAGE CERTIFIED MAIL (Domestic Mail)
For delivery information only
Postage \$
Certified Fee \$
Return Receipt Fee (Endorsement Required) \$
Restricted Delivery Fee (Endorsement Required) \$
Total Postage & Fees \$
Disc for Box 806 Sacramento, CA 95812
Materials Exported (Check all that apply)
[X] Bare CRTs
[X] CRT Devices
[X] CRT Glass
[X] UWEDs

State of California - California Environmental Protection Agency

Department of Toxic Substances Control

2: Name _____ Phone (____) _____

Address _____
Street City State Zip

Country _____ Phone (____) _____

Mailing Address _____
Street City State Zip

Specify the consignee and any alternate consignee of the materials

1: Name _____ Phone (____) _____

Address _____

Country _____ Phone (____) _____

Mailing Address _____
Street City State Zip

2: Name _____ Phone (____) _____

Address _____

Country _____ Phone (____) _____

Mailing Address _____
Street City State Zip

Specify all Points of Entry and Departure for each country through which the UWED and/or CRT material will pass

Departure: ^① Port of Long Beach, CA USA ^② San Diego, CA USA

Entry: See Attachment 1

Specify the estimated frequency of shipments of UWED and/or CRT materials

Weekly

Provide an estimate by count or weight for the UWED and/or CRT materials to be exported

UWED MATERIALS Up to 150 T / Month

CRT MATERIALS Up to 750 T / Month

Describe the recycling method used at the foreign destination

See Attachment 2

State of California - California Environmental Protection Agency

Department of Toxic Substances Control

D. Cathode Ray Tube Material Treatment [22 CCR section 68273.83(c) or (d)]. Please fill in the information requested below. Attach additional sheets if necessary. Include photographs and diagrams if desired.

1. Describe the type of CRT materials you handle and/or intend to treat and/or recycle.

CRT Monitors, TV, CRT Terminals

2. Describe the treatment and/or recycling process(es) you will conduct.

See Attachment 3

3. Check the box(es) that best describes your treatment/recycling activities.

- A. CRT vacuum release without breaking CRT glass.
- B. Yoke removal without breaking CRT glass.
- C. Process CRTs (CRT glass breakage without the use of heat, chemicals or water).
[You must check one or more below.]
 - Remove necks/electron guns
 - Separate panel from funnel
 - Size reduction, crushing, cutting, sawing, compacting, shredding
 - Other (e.g. manufacture of glass) please specify _____

D. All of the following documents must be submitted with this form if you have checked "C" above.

- I have attached documentation estimating the cost of facility closure prepared pursuant to title 22, California Code of Regulations, section 68285.142.
- I have attached documentation demonstrating financial assurance for closure pursuant to title 22, California Code of Regulations, section 68285.143.
- I have attached documentation demonstrating financial responsibility for liability pursuant to title 22, California Code of Regulations, section 68285.147.

E. Universal Waste Electronic Device Treatment [22 CCR section 68273.13/33(d)(3)(F)(1)(a)(4)]. Please fill in the information requested below. Attach additional sheets if necessary. Include photographs and diagrams if desired.

1. Describe the types of UWEDs you handle and intend to treat and/or recycle.

Printers, Scanners, CPU, Keyboards, Mice, Telephones, Radios, DVD/VCR Players, Calculators, other UWEDs.

2. Describe the treatment and/or recycling process(es) you will conduct.

See Attachment 3

State of California - California Environmental Protection Agency

Department of Toxic Substances Control

3. Check the box(es) that best describes your treatment/recycling activities.

- A. Dismantling UWEDs into only their respective components using:
- Manual methods and hand tools or mechanical separation of parts only.
 - Other *please specify* _____
 - Treatment residuals are components of the electronic device (e.g., circuit boards, integrated circuits, metals, plastic, wiring, universal waste batteries and lamps, etc.)
- B. Processing (without heat, chemicals or water)
- Shred or cut, etc., whole or parts of UWED after removing batteries, lamps, and other universal wastes.
 - Components of UWEDs are processed after removal (e.g., circuit boards, chips, other components).
 - Resultant materials generated from treatment are scrap metal and universal waste batteries and lamps.
- C. Processing (without heat, chemicals or water)
- Size reduction, crushing, cutting, sawing, compacting, shredding
 - Separation technology
 - Other *please specify* _____
 - Treatment residuals exhibit a hazardous waste characteristic and do not meet the definition of scrap metal or do not qualify for management as universal waste.
- D. All of the following documents are required if you have checked "C" above.
- I have attached documentation estimating the cost of facility closure prepared pursuant to title 22, California Code of Regulations, section 66285.142.
 - I have attached documentation demonstrating financial assurance for closure pursuant to title 22, California Code of Regulations, section 66285.143.
 - I have attached documentation demonstrating financial responsibility for liability pursuant to title 22, California Code of Regulations, section 66285.147.

F. Property Owner Notification.

I have attached documentation demonstrating that I, the CRT material handler and/or UWED handler, has notified the property owner (if different from the handler) that I am conducting hazardous waste treatment and recycling operation(s) at the facility pursuant title 22, California Code of Regulations, division 4.5, chapter 23 (Universal Waste Regulations).

I, the CRT material handler and/or UWED handler, am the property owner of the facility specified in Section "A".

G. Inspection

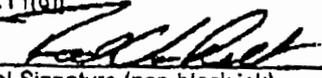
I, the CRT material handler and/or UWED handler, am aware that the facility specified in Section "A" is subject to unannounced inspections by state or local agencies to verify compliance with applicable universal waste regulations, air laws, worker health and safety laws, local zoning requirements and seismic and precipitation design standard requirements.

State of California - California Environmental Protection Agency

Department of Toxic Substances Control

H. Certification

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. [title 22, California Code of Regulations, division 4.5, chapter 20, section 66270.11(d)]

	<i>Env. Compliance Mgr</i>	<i>3.16.07</i>
Original Signature (non-black ink)	Title	Date

I. Notifications must be submitted to DTSC by certified mail, return receipt request.

MAIL TO: Department of Toxic Substances Control
 Hazardous Waste Management Program
 Regulatory Program Development Division
 P.O. BOX 806
 Sacramento, CA 95812-0808
 Attention: UWED/ CRT Materials Handling Activities

Attachment: 1

CRT Glass Export Listing

Company Name	Export Destination	Port of Entry
Dalian Phoenix Environment Protection Engineering Co., Ltd. 2108 BuLiE No. 29 Chengqing Street ZhongShan District, Dalian China	China	Dalian
LG Philips Displays Brazil Ltda. Rod. Presidente Dutra, KM 166 - Rio Comprido Sao Jose dos Campos Sao Paulo Brasil Zip 12240-420	Brazil	Santos
Hankuk Electric Glass (HEG) Co., Ltd. 160 Gongdan-Dong Gum-Si, Kyongsangbuk-Do Korea	Korea	Pusan
Samsung Corning (Malaysia) SDN. BHD Lot 835 & 800 Kawasan Perindustrian Tuanku Jaafar, 71450 Sungai Gadut, Negeri Sembilan Darul Khusus, Malaysia.	Malaysia	Klang
PakarDingin Pte. Ltd. PT.2108, Sri Senawang Light Industries Estate Jalan Tampin Seremban Malaysia	Malaysia	Klang
Tianjin Loyalty Glass Material Co., Ltd. Jizhao Road, Dagang Development Area, Tianjin	China	Tianjin
Surewin International RM 805, Kwong Kin Commerical CRT., Kin Fat St., Tuen Mud. N. T. Hong Kong	Hong Kong	Hong Kong
Ellitong Subic, Inc. Lot 65 B Golden Future St. Subic Bay Industrial Park Phase 1 Subic Bay Freeport Zone Philippines	Philippines	Subic Bay Freeport
Thanh Dat Co., Ltd. KM NO. 4 Hai Yen Hamlet A Mong Cai Town, Quang Ninh Province, Vietnam	Vietnam	Quang Ninh
Excel Electronics (Beihai) Company Limited, Manufacture Zone, Beihai Rd., Beihai, Guangxi Province, 538000, P.R. China	China	Beihai
SOURCE GLASS RECYCLING C/O Thomson Display Calzada Robledo Industrial No. 408 Desarrollo Industrial El Colorado Mexicali, B.C.C.P. 21384 Mexico	Mexico	Mexicali

ARC ARC International Corporation

Attachment: 2

C. Exports

Describe the recycling method used at the foreign destination:

LWED

- a. Disassembling
- b. Recovery of plastics, metals, etc.
- c. Reuse

CRT

- a. CRT Device - Reuse
- b. CRT Glass - Separate panel and tunnel glass for glass to glass recycling.

680 S. LEMON AVENUE, CITY OF INDUSTRY, CA 91789 USA
TEL: 626.855.8011 • FAX: 909.598.3819 • WWW.ARCIC.COM



**Attachment: 3****D. Cathode Ray Tube Material Treatment**

2. Describe the treatment and/or recycling process(es) you will conduct.
 - When shipment arrives, each pallet of CRT will be weighted and a receiving report along with a receiving number is created.
 - CRTs will be temporarily stored on pallets in our warehouse waiting for disassembling and disposal.
 - The CRT Tubes will then be sent to our machine for crushing.
 - CRT Glass will be kept in structurally sound containers/Gaylord boxes, per DTSC, Title 22, Section 66273.83(a)(1) standard, and ship to final destination for CRT Glass Recycling.

E. Universal Waste Electronic Device Treatment

2. Describe the treatment and/or recycling process(es) you will conduct.
 - When shipment arrives, each pallets of UWEDs will be weighted and a receiving report along with a receiving number is created.
 - UWEDs will be temporarily stored on pallets in our warehouse waiting for dissembling and disposal.
 - After each unit is dissembled, we will pick out the reusable parts, boards, plastics, cords, metals, etc. These materials will then be packed into boxes or palletized and shipped to reusers such as plastic manufacturers.
 - The remaining parts will then be sent to our destruction machine for destruction under the safety guideline set by the EPA and other government agencies.
 - After these materials are being destructed, plastics, glasses, metals will be separated our again for reuse.
 - After we have separated all the reusable and recyclable material, the remaining will then be sent to disposal services.

ARC HEADQUARTERS - USA

911 SOUTH BIXBY DRIVE, CITY OF INDUSTRY, CA 91745

TEL: 826.856.8011 FAX: 826.856.8010 WEBSITE: WWW.ARCIO.COM



Jerry Devon
Leasing Director

First Industrial Realty Trust, Inc.
114 Pacific, Suite 220
Irvine, California 92614
T: (949) 488-1876
F: (949) 488-1871
C: (310) 343-3282
jdevon@firstindustrial.com
www.firstindustrial.com

Date: December 2006

Address: 833 Turnbull Canyon Rd.
City of Industry, CA 91744

Dear Sir or Madam,

As you are aware, ARO, located at 833 Turnbull Canyon Rd, City of Industry, California, operates a facility that accepts computers and other electronic devices. These devices are considered hazardous waste in California. As part of our operations, ARO will also recycle these devices by dismantling them and then sending the components to other recyclers for further reuse. Based on these activities, we are considered a handler/recycler of universal waste electronic devices.

By way of this letter, I am notifying you, the property owner, that we are conducting a hazardous waste treatment and recycling operation at the facility pursuant to Title 22, California Code of Regulations, Division 4.5, and Chapter 20 as required by these regulations.

Sincerely,

Bruce Jan
General Manager

JRL 12/21/06
Jerry Devon
First Industrial Realty Trust

ARO HEADQUARTERS - USA
811 SOUTH BIXBY DRIVE, CITY OF INDUSTRY, CA 91744
TEL: 909.888.8011 FAX: 909.888.8010 WEBSITE: WWW.ARO10.COM



March 6, 2007

Union Bank of California
120 South San Pedro Street, Suite 400
Los Angeles, CA 90012

Dear Carl,

ARC International has been moved. Please note the new addresses listed below:

Corporate Office:

680 S. Lemon Ave.,
City of Industry, CA 91789

Operation Facility:

333 Turnbull Canyon Road,
City of Industry, CA 91745

Regards,

A handwritten signature in black ink, appearing to read "Kara Yu".

Kara Yu
Chief Financial Officer

ARC HEADQUARTERS - USA
911 SOUTH BIXBY DRIVE, CITY OF INDUSTRY, CA 91745
TEL: 626.866.8011 FAX: 626.866.8010 WEBSITE: WWW.ARCIC.COM

State of California - California Environmental Protection Agency

Department of Toxic Substances Control

TRUST AGREEMENT

Trust Account Number: 6711751900

This agreement is entered into as of February 9, 2006 and between:

GRANTOR	TRUSTEE
Grantor Name ARC INTERNATIONAL CORP.	Trustee Name Union Bank of California, N.A.
Address 91749 911 S Bixby Dr. City of Industry, CA	Address 120 S San Pedro St. 4 Floor, LA, CA 90012
<input checked="" type="checkbox"/> Corporation • Association <input type="checkbox"/> Partnership • Proprietorship <input type="checkbox"/> In the State of <u>California</u>	<input checked="" type="checkbox"/> A National Bank <input type="checkbox"/> Incorporated in the State of _____

Please indicate if this Trust Agreement is for either closure and/or postclosure or liability or both.

- Closure and/or Postclosure
- Liability

Please indicate if this Trust Agreement is a Trust Agreement, a Standby Trust Agreement or both.

- Trust Agreement
- Standby Trust Agreement
- Both

TERMS OF AGREEMENT

WHEREAS, the Department of Toxic Substances Control (DTSC), a department of the State of California, has established certain regulations applicable to the Grantor, requiring that an owner or operator of a hazardous waste management facility/transportable treatment unit (TTU) shall provide assurance that funds will be available when needed for closure and/or postclosure care of the facility/TTU and/or

WHEREAS, the Department of Toxic Substances Control (DTSC), a department of the State of California, has established certain regulations applicable to the Grantor, requiring that an owner or operator of a hazardous waste management facility/TTU or group of facilities/TTUs must demonstrate financial responsibility for bodily injury and property damage to third parties caused by sudden accidental and/or nonsudden accidental occurrences arising from the operations of the facility/TTU or group of facilities/TTUs.

WHEREAS, the Grantor has elected to establish a trust to provide all or part of such financial assurance for the facilities/TTUs identified herein.

WHEREAS, the Grantor, acting through its duly authorized officers, has selected the Trustee to be the Trustee under this agreement, and the Trustee is willing to act as Trustee.

NOW, THEREFORE, the Grantor and the Trustee agree as follows:

Section 1. Definitions. As used in this Agreement:

- (a) The term "Grantor" means the owner or operator who enters into this Agreement and any successor or assigns of the Grantor.
- (b) The term "Trustee" means the Trustee who enters into this Agreement and any successor Trustee.
- (c) The term "Beneficiary" means the State of California, Department of Toxic Substances Control.

DTSC 11/11/00 Revised 11/11/00

State of California - California Environmental Protection Agency

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Section 2. Identification of Facilities/RTUs and Cost Estimates. This Agreement pertains to the facilities/RTUs and cost estimates identified on attached Schedule A. (On Schedule A for each facility/RTU list the hazardous waste facility/RTU US EPA identification number, name, address, and the current closure and/or postclosure cost estimates (Indicate the closure and postclosure amounts separately), or portions thereof, for which financial assurance is demonstrated by this Agreement.)

Section 3. Identification of Facilities/RTUs. This agreement pertains to the facilities/RTUs identified on attached Schedule A. (On Schedule A for each facility/RTU list the EPA identification number, name, and address of the facility(ies)/RTU, and the amount of liability coverage, or portions thereof, if more than one party/agent affords combined coverage as demonstrated by this Agreement.)

Section 3. Establishment of Fund. The Grantor and the Trustee hereby establish a trust fund, the "Fund" for the benefit of the Beneficiary. The Grantor and the Trustee intend that no third party has access to the Fund except as herein provided. The Fund is established initially as consisting of the property, which is acceptable to the Trustee, described in Schedule 2 attached hereto. Such property and any other property subsequently transferred to the Trustee is referred to as the Fund, together with all earnings and profits thereon, less any payments or distributions made by the Trustee pursuant to this Agreement. The Fund shall be held by the Trustee, in trust, as hereinafter provided. The Trustee shall not be responsible nor shall it undertake any responsibility for the amount or adequacy of, nor any duty to collect from the Grantor, any payments necessary to discharge any liabilities of the Grantor established by the Beneficiary.

Section 3.1. Establishment of Fund. The Grantor and Trustee hereby establish a standby trust fund, hereinafter the "fund", for the benefit of any and all third parties injured or damaged by (sudden and/or accidental) accidental occurrences arising from operation of the facility(ies) covered by this Agreement, in the amount of (up to one million dollars) per occurrence and (up to two million dollars) annual aggregate for sudden accidental occurrences and (up to three million dollars) per occurrence and up to six million dollars annual aggregate for non sudden occurrences, except that the fund is not establish for the benefit of third parties for the following: (a) bodily injury or property damage for which (insert Grantor), is obligated to pay damages by reason of the assumption of liability in a contract or agreement. This exclusion does not apply to liability for damages that (insert Grantor) would be obligated to pay in the absence of the contract or agreement. (b) Any obligation of (insert Grantor) under a workers' compensation, disability benefit, an unemployment compensation law or any similar law. (c) Bodily injury to: (1) An employee of (insert Grantor) arising from, and in the course of, employment; by (insert Grantor); or (2) the spouse, child, parent, brother, or sister of that employee as a consequence of, or arising from, and in the course of employment by (insert Grantor). This exclusion applies: (A) whether (insert Grantor) may be liable as an employer of in any other capacity; and (B) to any obligation to share damages with or repay another person who must pay damages because of the injury to persons identified in paragraphs (1) and (2). (d) Bodily injury or property damage arising out of the ownership, maintenance, use or entrustment to others of any aircraft, motor vehicle or watercraft. (e) Property damage to: (1) Any property owned, rented, or occupied by (insert Grantor); (2) premises that are sold, given away or abandoned by (insert Grantor) if the property damage arises out of any part of those premises; (3) Property loaned to (insert Grantor); (4) Personal property in the care, custody or control of (insert Grantor); (5) that particular part of real property on which (insert Grantor) or any contractors or subcontractors working directly or indirectly on behalf of (insert Grantor) are performing operations; if the property damage arises out of these operations. In the event of combination with another mechanism for liability coverage, the fund shall be coordinated (insert primary), or (insert excess) coverage.

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Department of Toxic Substances Control

The Fund is established initially as consisting of the property, which is acceptable to the Trustee, described in Schedule B attached hereto. Such property and any other property subsequently transferred to the Trustee is referred to as the Fund, together with all earnings and profits thereon, less any payments or distributions made by the Trustee pursuant to this Agreement. The Fund shall be held by the Trustee, IN TRUST, as hereinafter provided. The Trustee shall not be responsible nor shall it undertake any responsibility for the amount or adequacy of, nor any duty to collect from the Grantor, any payments necessary to discharge any liabilities for the Grantor established by the Beneficiary.

Section 4. Payment for Closure and Postclosure Care. The Trustee shall make payments from the Fund as the Beneficiary shall direct, in writing, to provide for the payment of the costs of closure and/or postclosure care of the facilities/RTUs covered by this Agreement. The Trustee shall reimburse the Grantor or other persons as specified by the Beneficiary from the Fund for closure and post closure expenditures in such amounts as the Beneficiary shall direct in writing. In addition, the Trustee shall refund to the Grantor such amounts as the Beneficiary specifies in writing. Upon refund, such funds shall not constitute part of the fund as defined herein.

Section 4.1. Payment for Bodily Injury or Property Damage. The Trustee shall satisfy a third party liability claim by making payments from the Fund only upon receipt of one of the following documents:

(a) Certification from the Grantor and the third party claimant(s) that the liability claim should be paid. The certification must be worded as follows, except that instructions in brackets are to be replaced with the relevant information and the brackets deleted.

Certification of Valid Liability Claim

We, the undersigned, as parties _____ (insert name of Grantor) and _____ (insert name and address of third party claimant(s)), hereby certify that the claim of bodily injury and/or property damage caused by (sudden or non-sudden) accidental occurrence arising from operating hazardous waste treatment, storage, or disposal facility/RTU should be paid in the amount of \$ _____.

(Signature) _____
(Grantor) _____
(Grantor) _____

(Signature) _____
(Claimant(s)) _____
(Claimant(s)) _____

or (b) A valid final court order, establishing a judgment against the Grantor for bodily injury or property damage caused by sudden or non-sudden accidental occurrences arising from the operation of the Grantor's facility/RTU or group of facilities/RTUs.

Section 5. Payments Comprising the Fund. Payments made to the Trustee for the Fund shall consist of cash or securities acceptable to the Trustee.

Section 6. Trustee Management. The Trustee shall invest and reinvest the principal and income of the Fund and keep the fund invested as a single fund, without distinction between principal and income, in accordance with general investment policies and guidelines which the Grantor may communicate in writing to the Trustee from time to time, subject, however, to the provisions of this section. In investing, reinvesting, exchanging, selling, and managing the Fund, the Trustee shall discharge his or her duties with respect to the trust fund solely in the interest of the Beneficiary and with the care, skill, prudence, and diligence under the circumstances then prevailing which persons of prudence, acting in a like capacity and familiar with such matters, would use in the conduct of an enterprise of a like character and with like aims; except that:

(i) Securities or other obligations of the Grantor, or any other owner or operator of the facilities/RTUs, or any of their affiliates as defined in the Investment Company Act of 1940, as amended, 16 U.S.C. 80a-2(a), shall not be acquired or held, unless they are securities or other obligations of the Federal or State Government.

(ii) The Trustee is authorized to invest the fund in time or demand deposits of the Trustee, to the extent insured by an agency of the Federal or State Government, and

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(iii) The Trustee is authorized to hold cash awaiting investment or distribution uninvested for a reasonable time and without liability for the payment of interest thereon.

Section 7. Commingling and Investment. The Trustee is expressly authorized in its discretion:

- (a) To transfer from time to time any or all of the assets of the Fund to any common, commingled or collective trust fund created by the Trustee in which the fund is eligible to participate, subject to all of the provisions thereof, to be commingled with the assets of other trusts participating therein; and
- (b) To purchase shares in any investment company registered under the Investment Company Act of 1940, 15 U.S.C. 80a-1 et seq., including one which may be created, managed, underwritten or to which investment advice is rendered or the shares of which are sold by the Trustee. The Trustee may vote such shares in its discretion.

Section 8. Express Powers of Trustee. Without in any way limiting the powers and discretion conferred upon the Trustee by the other provisions of this Agreement or by law, the Trustee is expressly authorized and empowered:

- (a) To sell, exchange, convey, transfer or otherwise dispose of any property held by it, by public or private sale. No person dealing with the Trustee shall be bound to see to the application of the purchase money or to inquire into the validity or expediency of any such sale or other disposition;
- (b) To make, execute, acknowledge and deliver any and all documents of transfer and conveyance and any and all other instruments that may be necessary or appropriate to carry out the powers herein granted;
- (c) To register any securities held in the fund in its own name or in the name of a nominee and to hold any security in bearer form or in book entry, or to combine certificates representing such securities with certificates of the same issue held by the Trustee in other fiduciary capacities, or to deposit on arrange for the deposit of such securities in a qualified central depository even though, when so deposited, such securities may be merged and held in bulk in the name of the nominee of such depository with other securities deposited therein by another person, or to deposit or arrange for the deposit of any securities issued by the United States Government, or any agency or instrumentality thereof, with a Federal Reserve bank, but the books and records of the Trustee shall at all times show that all such securities are part of the Fund;
- (d) To deposit any cash in the Fund in interest-bearing accounts maintained or savings certificates issued by the Trustee, in its separate corporate capacity, or in any other banking institution affiliated with the Trustee, to the extent insured by an agency of the Federal or State Government; and
- (e) To compromise or otherwise adjust all claims in favor of or against the Fund.

Section 9. Taxes and Expenses. All taxes of any kind that may be assessed or levied against or in respect of the Fund and all brokerage commissions incurred by the Fund shall be paid from the Fund. All other expenses incurred by the Trustee in connection with the administration of this Trust, including fees for legal services rendered to the Trustee, the compensation of the Trustee to the extent not paid directly by the Grantor, and all other proper charges and disbursements of the Trustee shall be paid from the Fund.

Section 10. Annual Valuation. The Trustee shall annually, at least 30 days prior to the anniversary date of establishment of the Fund, furnish to the Grantor and to the Beneficiary a statement confirming the value of the Trust. Any securities in the Fund shall be valued at market value as of no more than 60 days prior to the anniversary date of establishment of the Fund. The failure of the Grantor to object in writing to the Trustee within 90 days after the statement has been furnished to the Grantor and Beneficiary shall constitute a conclusively binding assent by the Grantor, barring the Grantor from asserting any claim or liability against the Trustee with respect to matters disclosed in the statement.

Section 11. Advice of Counsel. The Trustee may from time to time consult with counsel, who may be counsel to the Grantor, with respect to any question arising as to the construction of this Agreement or any action to be taken hereunder. The Trustee shall be fully protected, to the extent permitted by law, in acting upon the advice of counsel.

Section 12. Trustee Compensation. The Trustee shall be entitled to reasonable compensation for its services as agreed upon in writing from time to time with the Grantor.

Section 13. Successor Trustee. The Trustee may resign or the Grantor may replace the Trustee, but such resignation or replacement shall not be effective until the Grantor has appointed a successor trustee and this successor accepts the appointment. The successor trustee shall have the same powers and duties as those conferred upon the Trustee hereunder. Upon the successor trustee's acceptance of the appointment, the Trustee shall assign, transfer and pay over to the successor trustee the funds and properties then constituting the Fund. If, for any reason, the Grantor cannot or does not act in the event of the resignation of the Trustee, the Trustee may apply to a court of competent jurisdiction for the appointment of a successor trustee or for

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Instructions. The successor trustee shall specify the date on which it assumes administration of the trust in a writing sent to the Grantor, Beneficiary, and the present Trustee by certified mail ten days before such change becomes effective. Any expenses incurred by the Trustee as a result of any of the acts contemplated by this Section shall be paid as provided in Section 3.

Section 14. Instructions to the Trustee. All orders, requests and instructions by the Grantor to the Trustee shall be in writing, signed by such persons as are designated in the attached Exhibit A or such other designees as the Grantor may designate by amendment to Exhibit A. The Trustee shall be fully protected in acting without inquiry in accordance with the Grantor's orders, requests and instructions. All orders, requests and instructions by the Beneficiary to the Trustee shall be in writing, signed by the Beneficiary designees, and the Trustee shall act and shall be fully protected in acting in accordance with such orders, requests and instructions. The Trustee shall have the right to assume, in the absence of written notice to the contrary, that no event constituting a change or a termination of the authority of any person to act on behalf of the Grantor or the Beneficiary hereunder has occurred. The Trustee shall have no duty to act in the absence of such orders, requests and instructions from the Grantor and/or Beneficiary, except as provided for herein.

Section 15. Notice of Nonpayment. The Trustee shall notify the Grantor and the Beneficiary, by either registered or certified mail within 10 days following the expiration for the 30-day period after the anniversary of the establishment of the Trust, if no payment is received from the Grantor during that period. After the pay-in period is completed, the Trustee shall not be required to send a notice of nonpayment.

Section 15.1. Notice of Nonpayment. If a payment for bodily injury or property damage is made under Section 4 of this trust, the Trustee shall notify the Grantor of such payment and the amount(s) thereof within five (5) working days. The Grantor shall, on or before the anniversary date of the establishment of the Fund following such notice, either make payments to the Trustee in amounts sufficient to cause the trust to return to its value immediately prior to the payment of claims under Section 4, or shall provide written proof to the Trustee that other financial assurance for liability coverage has been obtained equaling the amount necessary to return the Trust to its value prior to the payment of claims. If the Grantor does not either make payments to the Trustee or provide the Trustee with such proof, the Trustee shall within 10 working days after the anniversary date of the establishment of the Fund provide a written notice of non payment to the Beneficiary.

Section 16. Amendment of Agreement. This agreement may be amended by an instrument in writing executed by the Grantor, the Trustee and the Beneficiary, or by the Trustee and the Beneficiary, if the Grantor ceases to exist.

Section 17. Irrevocability and Termination. Subject to the right of the parties to amend this Agreement as provided in Section 16, this Trust shall be irrevocable and shall continue until terminated at the written agreement of the Grantor, the Trustee, and the Beneficiary, or by the Trustee and the Beneficiary, if the Grantor ceases to exist. Upon termination of the Trust, all remaining trust property, less final trust administration expenses, shall be delivered to the Grantor.

Section 18. Liability and Indemnification. The Trustee shall not incur personal liability of any nature in connection with any act or omission, made in good faith, in the administration of this Trust, or in carrying out any directions by the Grantor or the Beneficiary issued in accordance with this Agreement. The Trustee shall be indemnified and saved harmless by the Grantor or from the Trust Fund, or both, from and against any personal liability to which the Trustee may be subjected by reason of any act or conduct in its official capacity, including all expenses reasonably incurred in its defense in the event the Grantor fails to provide such defense.

Section 19. Choice of Law. This Agreement shall be interpreted, construed and enforced according to the laws of the State of California.

Section 20. Interpretation. As used in this Agreement, words in the singular include the plural and words in the plural include the singular. The descriptive headings for each section of this Agreement shall not affect the interpretation or the legal efficacy of this Agreement.

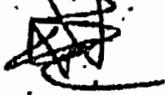
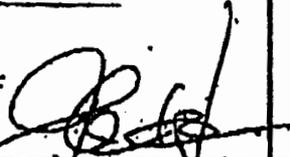
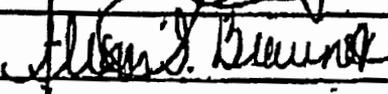
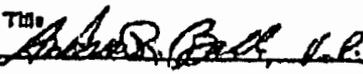
Section 21. Primary or Excess Coverage. In the event this trust fund is used in combination with another insurance coverage for closure and/or postclosure care, this fund shall be considered (insert "primary" or "excess") Primary coverage.

Section 21.1 Primary or Excess Coverage. In the event of combination with another insurance for liability coverage, the fund shall be considered (insert "primary" or "excess") primary coverage.

State of California - California Environmental Protection Agency

Department of Toxic Substances Control

IN WITNESS WHEREOF the parties have caused this Agreement to be executed by their respective officers duly authorized and their corporate seals to be hereunto affixed and attested as of the date first above written; the parties below certify that this document is being executed in accordance with the requirements of California Code of Regulations, Title 22, Division 4.5, Chapter 14 and 15, Article 0, Sections 66268.140 through 66268.148 and Sections 66268.140 through 66268.148.

Signature of Grantor 	Title CEO
Typed or Printed Name of Person Signing <u>SHAN HOOPER</u>	Seal
Attest Title Jay Hooper President 	
Signature of Trustee 	Title Vice President
Typed or Printed Name of Person Signing <u>Alison T. Braunstein</u>	Seal
Attest Title 	

PRIVACY STATEMENT

This information is requested by the Department of Toxic Substances Control, under Health and Safety Code, Section 25145, in order to verify adequate financial assurance of hazardous waste facilities/WFUs. Completion of the form is mandatory. The consequence of not completing the form is denial of a permit to operate a hazardous waste facility/WFU. Information may be provided to U. S. Environmental Protection Agency, State Air Quality Council, Air Resources Board, California Integrated Waste Management Board, Energy Resources Conservation and Development Commission, Water Resources Control Board and California Regional Water Quality Control Board. For more information or copies to your office, contact the Department of Toxic Substances Control, 9900 Cal Center Drive, Sacramento, California, 95826, (916) 228-6548.

State of California - California Environmental Protection Agency

Department of Trade and Consumer Protection

EXHIBIT A

TRUST AGREEMENT BY AND BETWEEN ARC International Corp.

AND THE Union Bank of California, N.A.

As provided for in Section 14 of the Trust Agreement, the persons, other than the officials of the Beneficiary identified in Section 14 of the Trust Agreement, who, until this Exhibit A is amended, shall have the authority to make orders, requests, and instructions to the Trustee are:

Officials of the Grantor:

Officials of the Grantor who have authority to give instructions are:

Name(s): Shan Hooper

Title(s): CFO

EXHIBIT A

Any orders, requests or instructions by the Grantor to the Trustee, pursuant to the foregoing Agreement, may be signed by any one of the following persons:

Name(s): Shan Hooper

Title(s): CFO

State of California - California Environmental Protection Agency

Department of Toxic Substances Control

**TRUST AGREEMENT STANDBY TRUST
SCHEDULE A**

The Agreement demonstrates financial assurance for the following cost estimate by the following Facility/TTU:

Remediation Waste Facility/TTU Identification Number	Name of Facility/TTU	Address of Remediation Waste Facility/TTU	Cost Estimate for which Financial Assurance Being Demonstrated by this Agreement
	ARC INTERNATIONAL CORP.	911 S. BIXBY DR. CITY OF INDUSTRY CA, 91745	Closure: \$47,000.00 Postclosure: Cleanup: Postclosure: Closure: Postclosure: Total: \$47,000.00

The cost estimate listed here was last adjusted on (date): 1/10/2005 CAL 000279749

Remediation Waste Facility/TTU Identification Number	Name of Facility/TTU	Address of Remediation Waste Facility/TTU	Liability Coverage Being Demonstrated by this Agreement
			Sudden per occurrence Sudden Annual aggregate No-sudden per occurrence No-sudden Annual aggregate Sudden per occurrence Sudden Annual aggregate No-sudden per occurrence No-sudden Annual aggregate Sudden per occurrence Sudden Annual aggregate No-sudden per occurrence No-sudden Annual aggregate Total aggregate

The Liability coverage listed here is effective on (date): _____

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Department of Toxic Substances Control

TRUST AGREEMENT (ONLY) SCHEDULE B

The fund is established initially as consisting of the following:

\$ 50,000.00 Fifty Thousand Dollars as evidenced by Spill Out Dollar Amount

Bank Name: Bank of America, N.A. Check Number: 10967

Date: 08/08/2005

I hereby certify that funds have been received and deposited.

Table with 2 columns: Authorized Signature (Alison T. Braunstein), Title (Vice President), Typed or Printed Name of Person Signing (Alison T. Braunstein), Address (Union Bank of California, 120 S. San Pedro Street, Suite 400, Los Angeles, CA 90012)

STANDARD TRUST AGREEMENT (ONLY)

SCHEDULE B

List of Property Compromising Trust Fund

None at the time of the trust establishment. Funding of this Standard Trust Agreement is contingent upon events against that primary,

Surety Bond or Letter of Credit number and issued by the Issuing Institution on Date

In accordance with the terms of that Surety Bond or Letter of Credit

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

State of California

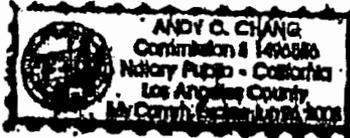
County of Los Angeles } ss.

On Feb 8th 2015 before me, ANDY C. CHANG

personally appeared STAN HOOPER

personally known to me
 appeared to me on the basis of satisfactory evidence

to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/hers/their authorized capacity(ies), and that by his/hers/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.



WITNESS my hand and official seal.

OPTIONAL

Though the information below is not required by law, it may prove valuable to persons relying on the document and would prevent frequent revision and re-execution of this form to include descriptions.

Description of Attached Document

Title or Type of Document: _____

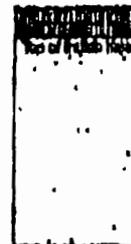
Document Date: _____ Number of Pages: _____

Signer(s) Other Than Named Above: _____

Capacity(ies) Claimed by Signer

Signer's Name: _____

- Individual
- Corporate Officer -- Title(s): _____
- Partner -- Limited General
- Attorney-in-Fact
- Trustee
- Guardian or Conservator
- Other: _____



Signer is Representing: _____

FINANCIAL ASSURANCE CHECKLIST FOR TRUST FUNDS		
Parent Company Name & Address:		
Facility Name & Address: <i>ARC International Corp. 911 S. Bixby Drive Industry, CA 91745</i>		
EPA ID No.: <i>CAL000273749</i>		
Facility Contact Person/Title: <i>Kara Yu</i>		
Facility Contact Phone No.: <i>(626) 855-8011</i>		
Instrument Covers (Check all that apply): <input checked="" type="checkbox"/> Closure <input type="checkbox"/> Postclosure <input type="checkbox"/> Sudden Liability <input type="checkbox"/> Nonsudden Liability.		
Land Disposal Facility (Circle one): <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Trustee Name & Address: <i>Union Bank of California, N.A. 120 S. San Pedro St., 6th Floor Los Angeles, CA 90012</i>		
Trustee Contact Person/Title: <i>Alison Braunstein / Vice President</i>		
Trustee Contact Phone No.: <i>(213) 972-5674</i>		
Trust Fund Effective Date: <i>2/9/2005</i>	Number of Years Remaining in the Trust Fund Pay-In Period (N/A for liability): <i>8</i>	
Trust Fund Expiration Date: <i>—</i>		
Trust Fund Instrument No.: <i>6711751900</i>		
Current Value of Trust Fund: Closure: \$ <i>51,469.91 (12/31/05)</i> Postclosure: \$		
	Trust Fund	Department Requirements
Closure Amount	<i>\$ 47,000</i>	<i>* \$ 43,800</i>
Closure Source Document	<i>Schedule A</i>	<i>Per Inspector</i>
Closure Document Date	<i>2/9/05</i>	<i>1/21/05</i>
Postclosure Amount	/	/
Postclosure Source Document	/	/
Postclosure Document Date	/	/

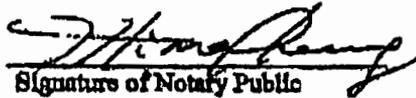
Adjusted for inflation, the current closure cost estimate is \$ 44,720

a:\review\rev1154

ACKNOWLEDGEMENT FOR TRUST AGREEMENT

Sets of California
County of Los Angeles

On this 4/17/06, before me personally came Rebecca Hooper to me known, who, being by me duly sworn, did depose and say that she resides at 18-Bishop Ct Arcadia, California 91006, that she is the CFO of ARC International Corp. the corporation described in and which executed the above instrument; that he knows the seal of said corporation; that the seal affixed to such instrument is such corporate seal; that it was so affixed by order of the Board of Directors of said corporation, and that she signed her name thereto by like order.


Signature of Notary Public



MINNA CHANG
Printed Name of Notary Public

4/18/06
Date

ALL-PURPOSE ACKNOWLEDGMENT

State of California
County of Los Angeles } ss.
On 4/18/06 before me, MINNA CHANG
personally appeared REBECCA HOOPER

personally known to me - OR- proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.



WITNESS my hand and official seal.

Handwritten signature of Minna Chang, Notary Public.

OPTIONAL INFORMATION

The information below is not required by law. However, it could prevent fraudulent attachment of this acknowledgment to an unauthorized document.

CAPACITY CLAIMED BY SIGNER (PRINCIPAL)

- Individual (checked)
Corporate Officer
Partner(s)
Attorney-in-fact
Trustee(s)
Guardian/conservator
Other

DESCRIPTION OF ATTACHED DOCUMENT

Acknowledgment for Trust Agreement
ONE (1) NUMBER OF PAGES
4/18/06 DATE OF DOCUMENT

SIGNER IS REPRESENTING:
NAME OF PERSON(S) OR ENTITY(IES)

RIGHT THUMBPRINT OF SIGNER



Department of Justice

Immigration and Naturalization Service

Petition for Name Change

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA

(NAME OF COURT)

As part of the naturalization process, you have the opportunity to legally change your name. Please complete lines 1-8 (Type or print clearly).

My full and correct name (current name):

1. REBECCA SHAN JIANG HOOPER (FIRST) (MIDDLE) (LAST)

2. Address 18 Bishop Ct. Amadia, CA 91006 (Number/Street) (City/State) (Zip Code)

3. Country of Nationality: China, People's Republic Of 4. Date of Birth: 03/10/1971 (Month) (Day) (Complete Year)

5. Alien Registration Card (Green Card) Number: A 075 684 180

6. I certify that I am not seeking a change of name for any unlawful purpose such as the avoidance of debt or evasion of law enforcement.

7. I petition the court to change my name to:

REBECCA HOOPER (FIRST) (MIDDLE) (LAST)

8. Date: 4/15/2005 Signature of Petitioner, (current name)

CERTIFICATION OF NAME CHANGE

I CERTIFY THAT THE ABOVE PETITION WAS GRANTED BY THE COURT ON MAR 20 2007 (Date)

SHEPHERD R. CARTER (Clerk) Rose Marie And (Deputy Clerk)

IMPORTANT INFORMATION

Your copy of this petition, along with your Certificate of Naturalization, which you will receive upon taking the oath of allegiance, will verify that you elected to change your name. Your Certificate of Naturalization bears your new name as changed per Order of the Court.

04/14/2006 18167 923-255-9118

PAGE 02
04/14/06

State of California-California Environmental Protection Agency

Department of Toxic Substances Control

LIABILITY CERTIFICATE OF INSURANCE

(Additional space is needed, add attachment)

Insured Name: Wentzinger Surplus Lines Ins. Co. (Company Address) 488 Walnut Street Philadelphia, PA 19103	Insured Name: ARO International Corp. (Insured Address) 881 Bixby Drive City of Industry, CA 91748
Licensed Agent: NA10 18172	Issued by State of: Georgia

Hazardous Waste Facility (TTU) Covered:		LIMITS OF LIABILITY		
Name	Address	Hazardous Waste Facility (TTU) Identification Number	General Comprehensive Each Occurrence Actual Aggregate Limits	Non-Underground Storage Tank (UST) Actual Aggregate Limits
ARO International Corp.	881 Bixby Drive City of Industry, CA 91748		\$1,000,000 \$1,000,000	\$1,000,000 \$1,000,000
Policy Number	60418-0001 002	Effective Date	3-4-2007	Policy
			\$1,000,000 \$1,000,000	\$1,000,000 \$1,000,000

Insurer Certification
 1. The insurer hereby certifies that it has issued liability insurance covering bodily injury and property damage to the insured in connection with the insured's obligation to demonstrate financial responsibility under California Code of Regulations, Title 22, Division 4.6, Chapter 14 and 18, Article 8, Sections 60264.147 and 60265.147. The coverage applies at the facilities/transportable treatment units (TTU) listed above for:

- sudden accidents
- non-sudden accidental occurrences, or
- both.

The coverage provided by the above policy is
 primary coverage excess coverage

If excess coverage, the primary coverage mechanism shall also be demonstrated.

2. The insurer further certifies the following with respect to the insurance described above:

- (a) Bankruptcy or insolvency of the insured shall not relieve the insurer of its obligations under the policy.
- (b) The insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in California Code of Regulations, Title 22, Division 4.6, Chapter 14 and 18, Article 8, Section 60264.147 and 60265.147.
- (c) Whenever requested by the Department of Toxic Substances Control (DTSC), the insurer agrees to furnish to DTSC a signed duplicate of the original of the policy and all endorsements.
- (d) Cancellation of the insurance, whether by the insurer, the insured, a parent corporation providing insurance coverage for its subsidiary, or by a firm having an insurable interest in and obtaining liability insurance on behalf of the owner or operator of the hazardous waste management facility/TTU will be effective only upon written notice and only after the expiration of 90 days after a copy of such written notice is received by DTSC as evidenced by a duly executed return receipt.
- (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the DTSC as evidenced by a duly executed return receipt.

0780 1150 0110/2616

Page 1 of 2

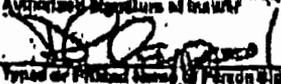
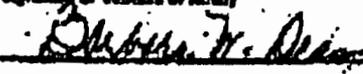
04/14/2005 18:07 823-266-8119

PAGE 82
10/04/05

State of California-California Environmental Protection Agency

Department of Toxic Substances Control

I hereby certify that the wording of this instrument is identical to the wording specified in California Code of Regulations, Title 22, section 00284.181, subsection (D), is being executed in accordance with California Code of Regulations, Title 22, Division 4.8, Chapter 14 and 18, Article 6, and that the insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more states.

Authorized Signature of Insurer 	Title AVP
Typed or Printed Name of Person Signing Devin Claypool	
Signature of Underwriter 	Date 4-13-2008

PRIVACY STATEMENT

This information is requested by the Department of Toxic Substances Control under (Smith and Wadsworth) Section 83304. It is used to verify compliance with the provisions of the California Environmental Protection Agency (EPA) California Code of Regulations (CCR) Title 22, Division 4.8, Chapter 14 and 18, Article 6, and that the insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more states. This information is provided to the U.S. Environmental Protection Agency, State Attorney General, Air Resources Board, California Department of Public Health, Energy Resources Conservation and Development, Water Resources Control Board, and California Department of Water Resources. For more information, please contact the Department of Toxic Substances Control, 8500 Cst Center Blvd, Sacramento, California 95828, or (916) 227-1234.

ARC INTERNATIONAL CORP.

— A SIMPLE STEP FOR A BETTER FUTURE

June 11, 2007

South Coast AQMD
Engineering Division
21865 Copley
Diamond Bar, CA 91765

To whom it may concern:

Per the request of the Department of Toxic Substance Control (DTSC), ARC International Corporation is notifying the local air district (South Coast AQMD) regarding the need for a permit. As an electronic waste management company, ARC dismantles television and computer monitors that contain cathode ray tubes (CRTs), a glass tube that contains lead. The dismantled CRTs are relieved of the gas vacuum by puncturing a small hole in the back of the monitor or the bare CRT tube is crushed into glass cullet. After the processes, the bare tubes or glass cullet is sent downstream for crushing, glass washing or lead smelting. Please see the attached Standard Operating Procedures for a full explanation on how the machinery operates.

However, since the materials that ARC processes are heavy, such as lead and glass, there are no emissions being released into the atmosphere. Aside from that crucial fact, all operations are done inside and there are no vents releasing any form of emissions into the atmosphere through the roof or to the outside air. Therefore, ARC appears to be exempt from obtaining a permit with the AQMD. Please formally respond to our request to receive an exemption letter so that ARC may have proof that we have notified the proper authority concerning an air permit and are exempt from obtaining a permit. Thank you in advance for your cooperation and your assistance.

Sincerely,

Mike Easterbrook
Environmental Compliance Coordinator
680 S. Lemon Ave.
City of Industry, CA 91789
Direct: 626-606-1048
Fax: 626-855-8010

680 S. Lemon Avenue
City of Industry, CA 91789
Tel: 626-855-8011 Fax: 626-855-8010

ARC INTERNATIONAL CORP.

Headquarters

333 Turnbull Canyon Road, City of Industry, CA 91745
Tel: (626)855-8011 Fax: (626) 855-8010

**CRT Material Handling Activities
Department of Toxic Substance Control
Hazardous Waste Management Program
Regulatory and Program Development Division
P.O. Box 806, Sacramento, CA 95812-0806**

**Annual Report
CRT Material Handler**

1. Name and Mailing Address:

ARC International Corporation
333 Turnbull Canyon Road, City of Industry, CA 91745

2. The name and business telephone number of the person at the CRT materials handler's site who should be contacted regarding universal waste management activities:

Name: Sunny Young
Title: COO
Phone Number: (626)606-1068

3. The address of physical location including the county of the CRT material management activities:

Name: ARC International Corporation
Physical Address: 333 Turnbull Canyon Road, City of Industry, CA 91745
County: Los Angeles

4. The total quantity of CRTs (count), the total quantity of CRT Devices (count), and the total quantity of CRT glass (weight) handled during the previous year:

CRTs -13,612 Units, 11,590,002 lbs.
CRT Devices -355,794 Units, 15,508,348.5 Lbs
CRT Glass - 0 lbs. (ARC does not accept CRT Glass from outside)

5. A list including the names, addresses, and phone numbers of each location that the handler shipped CRTs to during the previous year and the total quantity of CRTs (count) shipped to each location:

Name, Address and Phone Number	CRTs Shipped
ARC International Corp. (for treatment purposes)	2,969,167 lbs.
Source Glass Recycling C/O Thomson Display Calzada Robledo Industrial No.406 Desarrollo Industrial El Colorado Mexicalli, B.C.C.P. 21384 Mexico Phone Number : 011-52-696-559-5274	13,611,269 lbs.

6. A list including the names, addresses, and phone numbers of each location that the handler shipped CRT Devices to during the previous year and the total quantity of CRT Devices (count) shipped to each location.

Name, Address and Phone Number	CRT Devices Shipped
ARC International Corp. (for treatment purposes)	15,508,348.5 Lbs

7. A list including the names, addresses and phone numbers of each location that the handler shipped CRT glass to during the previous year and the total quantity of CRT glass (weight) shipped to each location.

CRT Glass is generated from ARC's own treatment of CRTs and CRT Devices. This part is to be report on the Annual Report for CRT Treatment.

Certification:

I certify under the 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 my knowledge and belief, true, accurate, and complete. I am aware that there significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

President

01/25/2008

Jay Hooper

Title

Date

ARC INTERNATIONAL CORP.

A SIMPLE SOLUTION FOR A COMPLEX PROBLEM

Headquarters

333 Turnbull Canyon Road, City of Industry, CA 91745
Tel: (626)855-8011 Fax: (626) 855-8010

**CRT Material Handling Activities
Department of Toxic Substance Control
Hazardous Waste Management Program
Regulatory and Program Development Division
P.O. Box 806, Sacramento, CA95812-0806**

Annual Report

CRT Treatment

1. The name, address, physical location and description of the facility:

Name: ARC International Corporation

Physical Address: 333 Turnbull Canyon Road, City of Industry, CA 91745

Description of the Facility: Disassembly and Dismantling of CRT Devices and
Crushing and Shredding of CRTs.

2. The mailing address of the business entity that owns and operates the facility:

333 Turnbull Canyon Road, City of Industry, CA 91745

3. The name, title and telephone number of the person at the facility who should be contacted regarding universal waste management activities at the facility:

Name: Sunny Young

Title: COO

Phone No.: (626) 606-1068

4. Facility EPA ID: CAR000180257

5. The number of days each facility operated: around 210 days, excluding weekends and holidays.

6. The total quantity (count or weight) of CRT devices treated or recycled by the handler during the previous year:

Total Quantity of CRT Devices treated or recycled is 14,110,495.5 lbs.

7. The total quantity (count or weight) of CRTs treated or recycled by the handler during the previous year:

Total Quantity of CRTs treated or recycled is 2,969,167 lbs.

A list including the names, addresses and phone numbers of each location that the handler shipped CRT glass to during the previous year and total quantity of CRT glass (weight) shipped to each location:

Name, Address and Phone Number	Total CRT Glass Shipped
Dalian Phoenix Environmental Protection Engineering Co., Ltd. 2108 Bult. E No. 29 Changqing Street ZhongShan District, Dalian, China	3,423,790 lbs.
KSTEEL RESOURCES No. 8, Lorong 51A/227C, 46100 Petaling Jaya Selangor Darul Eshan Phone Number: 6013-067-0108 Contact: Mr. Hisham	1,803,512 lbs.

8. The treatment or recycling methods used for each CRT material treated by the facility:

- a. Disassembly/dismantling
- b. Vacuum release
- c. Yoke Removal
- d. Crushing/Shredding

Certification:

I certify under the 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 my knowledge and belief, true, accurate, and complete. I am aware that there significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

President

01/25/2008

Jay Hooper

Title

Date

ARC INTERNATIONAL, INC.

A SIMPLE SOLUTION FOR A COMPLEX PROBLEM

Headquarters

333 Turnbull Canyon Road, City of Industry, CA 91745

Tel: (626)855-8011 Fax: (626) 855-8010

**CRT Material Handling Activities
Department of Toxic Substance Control
Hazardous Waste Management Program
Regulatory and Program Development Division
P.O. Box 806, Sacramento, CA95812-0806**

**Annual Report
CRT Yoke Removal**

- 1. The name, address, physical location and description of the facility:**
Name: ARC International Corporation
Physical Address: 333 Turnbull Canyon Road, City of Industry, CA 91745
Description of the Facility: Disassembly and Dismantling of CRT Devices, Yoke Removal and Crushing and Shredding of CRTs.
- 2. The mailing address of the business entity that owns and operates the facility:**
333 Turnbull Canyon Road, City of Industry, CA 91745
- 3. The name, title and telephone number of the person at the facility who should be contacted regarding universal waste management activities at the facility:**
Name: Sunny Young
Title: COO
Phone No.: (626) 606-1068
- 4. Facility EPA ID: CAR000180257**
- 5. The number of days each facility operated: around 210, excluding holidays and weekends.**
- 6. The total quantity (count or weight) of CRTs treated or recycled by the handler during the previous year:**
CRTs -2,969,167 lbs
CRT Devices -14,110,495.5 lbs

7. A list including the names, addresses and phone numbers of each location that the handler shipped CRTs and Yokes to during the previous year and total quantity of CRTs and Yokes (weight) shipped to each location:

Name, Address and Phone No.	Material	Weight
ARC International Corporation 333 Turnbull Canyon Road, City of Industry 91745 Tel: (626)855-8011	CRTs (to be crushed)	2,969,167 lbs.
Source Glass Recycling C/O Thomson Display Calzada Robledo Industrial No.406 Desarrollo Industrial El Colorado Mexicali, B.C.C.P. 21384 Mexico Phone Number : 011-52-696-559-5274	CRTs	13,611,269 lbs.
TOP MARK ENTERPRISES LIMITED 121 DES VOEUX RD. UNIT 1-3 5 FL HONG KONG Tel: 137-8857-6698 Tel: 139-7318-0488 Contact: Mr Wan	Yoke	76,710 lbs.
SAR LOGISTICS LIMITED Room 602 6/f, Kwong Loong Tai Bldg. 1016-1018 Tai Nan West St., KOWLOON, HONG KONG Tel: 852-2975-8189 Fax: 852-2975-8289 Contact: MS. Dami	Yoke	1,404 lbs.
San Tak Industrial Limited Unitc On 26/F Gold King Industrial Building Nos. 35/41 Tai Lin Pai Road Kwai Chung N.T. Tel: 852-2485-0081 852-2619-1266 Fax: 852-2485-2279 CONTACT: Lam Hon Yam	Yoke	1,559 lbs.
WING FAT HONG INT'L LTD. RM 43, WAHDOLF SHOPPING CENTER TM, HONG KONG TEL/Fax: 852-2422-0002 CONTACT: WINNIE	Yoke	8,563 lbs.

8. The treatment or recycling methods used for each CRT material treated by the facility:
- a. Dismantling/disassembly

- b. Removal of Yoke
- c. Vacuum Release
- d. Crushing and Shredding

Certification:

I certify under the 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 my knowledge and belief, true, accurate, and complete. I am aware that there significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

President

01/25/2008

Jay Hooper

Title

Date

ARC INTERNATIONAL CORP.

UNIVERSAL WASTE ELECTRONIC DEVICE HANDLER

Headquarters

333 Turnbull Canyon Road, City of Industry, CA 91745
Tel: (626)855-8011 Fax: (626) 855-8010

UWED Handling Activities
Department of Toxic Substance Control
Hazardous Waste Management Program
Regulatory and Program Development Division
P.O. Box 806, Sacramento, CA95812-0806

Annual Report Universal Waste Electronic Device Handler

1. **Name of Handler:** ARC International Corporation
2. **Telephone of Handler:** (626)855-8011
3. **Mailing Address of Handler:** 333 Turnbull Canyon Road, City of Industry, CA 91745
4. **Physical Address of Handler:** 333 Turnbull Canyon Road, City of Industry, CA 91745
5. **Name of Contact Person:** Sunny Young
6. **Telephone Number of the Contact Person:** (626)606-1068
7. **Email address for the contact person or organization:** sunny@arcic.com
8. **Type of Universal Waste Electronic Device handled:**
 - a. CRT Devices
 - b. PC Systems/Servers
 - c. LCD Monitors/notebooks
 - d. Printers
 - e. Copiers
 - f. Cell Phones
 - g. Networking Equipment
 - h. Miscellaneous –Electronic Devices containing Printed Circuit Boards
9. **The total quantity of universal waste electronic devices (count or weight) handled during the previous calendar year:**

10,900,634.7 lbs., excluding CRTs and CRT Devices

10. A list including the names, addresses, and home numbers of each location that the large quantity handler shipped universal waste electronic devices to during the previous year and the total quantity of universal waste electronic devices (count or weight) shipped to each location:

Name, Address and Phone Number	Weight of UWED Shipped
ARC International Corp. (To be treated/disassembled/dismantled)	1,176,461.7 lbs.
Wing Fat Hong Intel LTD., Kingswood Villas. TSW. NT, Hong Kong Phone No.: 852-9093-2002	7,021,152 lbs.
Kamtix LTD FTA, 5/F, Cheerbond Court 156 Boundary St. KLN, Hong Kong Phone No.: 852-9436-6288	2,703,021 lbs.

Certification:

I certify under the 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 my knowledge and belief, true, accurate, and complete. I am aware that there significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

	President	01/25/2008
Jay Hooper	Title	Date

ARC INTERNATIONAL CORP.

INCORPORATED IN THE STATE OF CALIFORNIA

Headquarters

333 Turnbull Canyon Road, City of Industry, CA 91745

Tel: (626)855-8011 Fax: (626) 855-8010

UWED Handling Activities
Department of Toxic Substance Control
Hazardous Waste Management Program
Regulatory and Program Development Division
P.O. Box 806, Sacramento, CA95812-0806

Annual Report Universal Waste Electronic Device Treatment

1. **The name, address, physical location and description of the facility:**
Name: ARC International Corporation
Physical Address: 333 Turnbull Canyon Road, City of Industry, CA 91745
Description of the Facility: Disassembly and Dismantling of UWED.
2. **The mailing address of the business entity that owns and operates the facility:**
333 Turnbull Canyon Road, City of Industry, CA 91745
3. **The name, title and telephone number of the person at the facility who should be contacted regarding universal waste management activities at the facility:**
Name: Sunny Young
Title: COO
Phone No.: (626) 606-1068
4. **Facility EPA ID:** CAR000180257
5. **The number of days each facility operated:** around 210 days, excluding holidays and weekends.
6. **The total quantity (count or weight) of universal waste electronic devices (with their respective types or categories) treated or recycled by the handler during the previous year:**
 - a. Total UWED received is 10,900,634.7., excluding CRTs and CRT Devices
 - b. Total UWED treated or recycled is 1,176,461.7 lbs.
7. **The treatment or recycling methods used for each universal waste electronic device treated by the facility:**
 - a. Dismantling
 - b. Disassembling
 - c. Crushing and Shredding
8. **The final destination of universal waste electronic devices recycled:**
 - a. **Metal Scrap/Parts** -Wing Fat Hong Intel LTD., Kingswood Villas. TSW. NT, Hong Kong

- b. **Metal Scrap/Parts** –Kamtix LTD FTA, 5/F, Cheerbond Court 156
Boundary St. KLN, Hong Kong
- c. **Plastics** – Kamtix LTD FTA, 5/F, Cheerbond Court 156 Boundary St.
KLN, Hong Kong

Certification:

I certify under the 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 my knowledge and belief, true, accurate, and complete. I am aware that there significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

	President	01/25/2008
Jay Hooper	Title	Date

HAZARD APPRAISAL AND RECOGNITION PLAN PRESITE VISIT FORM

SECTION A. FIELD TEAM

Prepared by: Ellen Pates
 Date: 3/24/2008
 Phone: (818) 551-2987

	Name	Unit/Agency	Responsibility (Lead Field Staff)
1.	Tolu Awosika	SCD	Back-up
2.	Ellen Pates	SCD	Lead
3.			
4.			
5.			
6.			

SECTION B. SITE DESCRIPTION

Site Name: ARC INTERNATIONAL
 PCA No: 22327 Project #: 550211 WP: 48
 Address: 333 Turnbull Canyon Road
 City: City of Industry State: CA Zip: 91744
 Site Phone No: (626) 606-0200

NOTE: Attach Map of Site and Directions to Hospital

Contact Person: Sunny Young
 Type of Operation/Waste Stream (Describe): E-waste SB 20 Recycling
 Purpose of Visit (Describe): SB 20 E-waste Inspection
 Site Visit Date (s): 3/24/07
 Estimated Time on Site: Hours/Day: 8 Days: 1
 Nearest Hospital and Address: 14282 Amar Road, La Puente CA
 Phone No.: (626) 917-4481

SECTION C. NUMBER OF SAMPLES TO BE COLLECTED

Air: _____ Surface Impoundment: _____
 Drum (s): _____ Surface Water: _____
 Groundwater: _____ Tank (s): _____
 Soil/Sediment: _____ Waste/Sludge: _____
 Sump/Pit: _____ Other: _____

SECTION D. POTENTIAL HAZARDS

- | | |
|--|---|
| 1. Chemical Hazards | 2. Physical Hazards |
| <input type="checkbox"/> Carcinogens: _____ | <input type="checkbox"/> Confined Space |
| <input type="checkbox"/> Corrosives: _____ | (Source: _____) |
| <input type="checkbox"/> Developmental Health Hazards (Teratogen): _____ | <input type="checkbox"/> Heat or Cold Stress (Expected (Temp: _____ °F) |
| <input type="checkbox"/> Explosives: _____ | <input type="checkbox"/> Machinery Construction: _____ |
| <input type="checkbox"/> Dusts: _____ | <input type="checkbox"/> Noise (Source/Decibels): _____ |
| <input type="checkbox"/> Flammables: _____ | <input type="checkbox"/> Oxygen Deficiency: _____ |
| <input type="checkbox"/> Inorganic Vapor Gases: _____ | <input type="checkbox"/> Radioactive materials: _____ |
| <input type="checkbox"/> Metals: _____ | <input type="checkbox"/> Biohazards: _____ |
| <input type="checkbox"/> Oxidizers: _____ | <input checked="" type="checkbox"/> Other (Specify): _____ |
| <input type="checkbox"/> PCBs: _____ | Universal Waste Electronic Devices |
| <input type="checkbox"/> Pesticides: _____ | CRTS |
| <input type="checkbox"/> Reproductive Health Hazards: _____ | |
| <input type="checkbox"/> Skin Absorption: _____ | |
| <input type="checkbox"/> Solvents: _____ | |

(Use this space to describe hazards)

Do not enter truck, open drums/lids/containers.

Be aware of moving vehicles

Stay hydrated.

SECTION E. BASIC INFORMATION ON POTENTIAL HAZARDS

(Attach copies of HARP Chemical Data Sheets or other appropriate information as suggested in instructions.)

SECTION F. EXPOSURE CONTROL METHODS

- Engineering (E) Administrative (A) Work Practices (WP)

Describe: Walkthrough of the facility and Record Review Evaluation

SECTION G. REQUIRED PERSONAL PROTECTIVE EQUIPMENT

Level of Protection: B C D

Gloves (s) Outer = O, Inner = I

- | | |
|--|-------------------------------------|
| <input type="checkbox"/> Cotton/Vinyl | <input type="checkbox"/> Tyvek |
| <input type="checkbox"/> Silver Shield/4H | <input type="checkbox"/> P.E. Tyvek |
| <input type="checkbox"/> Neoprene | <input type="checkbox"/> Saranex |
| <input type="checkbox"/> Nitrile | <input type="checkbox"/> PVC |
| <input type="checkbox"/> Grip/Glove/Kevlar (when needed) | <input type="checkbox"/> Tychem |
| <input type="checkbox"/> Viton | |

Respirator: A/P Cartridge: _____ SCBA Escape

Other Safety Gear:

- | | | |
|---|--|---|
| <input type="checkbox"/> Boot Covers | <input type="checkbox"/> Hearing Protection | Plugs <input type="checkbox"/> Muffs <input type="checkbox"/> |
| <input checked="" type="checkbox"/> Boots | <input checked="" type="checkbox"/> Eye Protection | <input checked="" type="checkbox"/> Safety Vest |
| <input checked="" type="checkbox"/> Hard Hats | <input type="checkbox"/> Other: | |

SECTION H. SURVEY EQUIPMENT

- | | |
|---|---|
| <input type="checkbox"/> Combustible Gas/Oxygen Meter | <input type="checkbox"/> Radiation Meter |
| <input type="checkbox"/> Photoionization Detector | <input type="checkbox"/> Lamp: _____ |
| <input type="checkbox"/> Organic Vapor Analyzer (OVA) | <input type="checkbox"/> Aerosol/Particle Monitor |
| <input type="checkbox"/> CMF Chip (Specify): _____ | <input type="checkbox"/> Noise Dosimeter |
| <input type="checkbox"/> PAC III | <input type="checkbox"/> WBGT Meter |
| <input type="checkbox"/> Other (Specify): N/A | |

SECTION I. OTHER HYGIENE AND SAFETY EQUIPMENT

- | | | |
|--------------------------|--------------------------|-------------------------------|
| Available | Bring | |
| On Site | | |
| <input type="checkbox"/> | <input type="checkbox"/> | Canopy/Tarp/Umbrella |
| <input type="checkbox"/> | <input type="checkbox"/> | Drinking Water |
| <input type="checkbox"/> | <input type="checkbox"/> | Shower/Eye Wash |
| <input type="checkbox"/> | <input type="checkbox"/> | Fire Extinguisher |
| <input type="checkbox"/> | <input type="checkbox"/> | First Aid Kit |
| <input type="checkbox"/> | <input type="checkbox"/> | Plastic Sheeting/Buckets/Bags |
| <input type="checkbox"/> | <input type="checkbox"/> | Portable Toilets |
| <input type="checkbox"/> | <input type="checkbox"/> | Washing Facilities |

SECTION J. PERSONAL MONITORING

Do You Need Industrial Hygiene Monitoring? Yes No

SECTION K. REVIEW/APPROVAL

[Signature] 3/25/08
 Industrial Hygienist (Review) Date

[Signature] 3-25-08
 Supervisor (Approval) Date

SUMMARY OF OBSERVATIONS

On June 26, 2007, the Department of Toxic Substances Control (DTSC), California Environmental Protection Agency, conducted an inspection at:

Facility Name: ARC INTERNATIONAL CORPORATION

Facility Address: 333 Turnbull Canyon Road
City of Industry, LA CA. 91745

EPA ID Number: CAL000315696

County Name: LOS ANGELES

Check line below as appropriate

As a result of that inspection, no violations of hazardous waste laws, regulations, and requirements were discovered. ~~DTSC will provide you a complete inspection report within 65 days of the date of this inspection.~~ DTSC greatly appreciates the efforts that you have made to comply with the hazardous waste laws and regulations.

As a result of this inspection, the following issue(s) require additional investigation. DTSC will address all unresolved issued in the inspection report. (Use additional paper as necessary.)

Authorized Company Representative

Name Mike Easterbrook

Title Env. Comp. Coordinator

Signature [Signature]

Date 06/26/2007

Authorized State Agent

Name ELLEN PATES

Title HAZ. SUBSTANCES SCIENTIST

Signature [Signature]

Date JUNE 26, 2007

**35 20 / Universal Waste (UW)
Large Quantity Handler Inspection Report**

Facility Name: ARC INTERNATIONAL CORPORATION
 Identification Number: CAL 000315696 / CAR 000180257
 Facility Address: 333 TUENTHALL CANYON RD.
CITY OF INDUSTRY, CA 91745
 Date Inspected: JUNE 26, 2007
 Inspected By: ELLEN PATES
 Type of Inspection: Annual Re-inspection Complaint
 Consent given by: MIKE EASTERBROOK Time: 1:20 PM

DISCLAIMER

This checklist is intended to provide guidance only. This checklist does not replace or supersede relevant statutes and regulations. The information contained in this checklist is based upon the statutes and regulations in effect as of the date the checklist was signed. Interested parties are advised to keep apprised of subsequent changes to relevant statutes and regulations.

Note: Citations that start with the number "66" are to the California Code of Regulations (CCR), title 22, division 4.5. Citations that start with the number "42" are to the Public Resources Code, division 30, part 3, chapter 8.5.

REGULATED FACILITIES AND WASTES

This checklist applies to large quantity handlers of UW electronic devices. "Large Quantity Handler of Universal Waste" is defined as a universal waste handler who accumulates 5,000 kilograms or more total of universal waste (e.g., batteries, thermostats, lamps, etc. calculated collectively) at any time. This designation as a large quantity handler of universal waste is retained through the end of the calendar year in which 5,000 kilograms or more total of universal waste is accumulated. [66273.9]

An electronic device that is listed in California Code of Regulations, Title 22, section 66260.201, subdivision (c) of Appendix X to Chapter 11 shall be managed as a "covered electronic device" under chapter 8.5 of part 3 of division 30 of the Public Resources Code (section 42460 et seq.) unless the manufacturer of the device has obtained the DTSC's concurrence that the device is non hazardous pursuant to subsection (c). [66260.201]

Examples of electronic devices that shall be managed as a "covered electronic device" include, but are not limited to the following:

Computers, computer peripherals, telephones, answering machines, radios, stereo equipment, tape players/recorders, phonographs, video cassette players/recorders, compact disc players/recorders, calculators, and some appliances. [66273.9]

Check box if violation: (if checked see attached SOV)

PROHIBITIONS	
<input type="checkbox"/>	Disposed of UW [66273.31(a)]
<input type="checkbox"/>	Diluted or treated universal waste, except by responding to releases as provided in section 66273.37; or by managing specific wastes as provided in section 66273.33. [66273.31(b)]
WASTE MANAGEMENT	
Containment	
<input type="checkbox"/>	Failed to handle any UW electronic devices in a manner that minimizes breakage. [66273.33(d)(1)(A)]
<input type="checkbox"/>	Failed to store (e.g., in containers) UW electronic devices or manage (e.g., stored in a room) whole UW electronic devices in a manner that could reasonably prevent leakage, spillage, damage, or breakage resulting in a release of hazardous components contained within the device. [66273.33(d)(1)(A)]
<input type="checkbox"/>	Failed to immediately clean up and place in a container any UW electronic device that is broken and may reasonably be expected to cause a release of hazardous constituents to the environment. [66273.33(d)(1)(B)]
<input type="checkbox"/>	Failed to ensure that containers used to store broken UW electronic devices that may reasonably be expected to cause a release of hazardous constituents to the environment are structurally sound, compatible with the contents of the universal waste electronic devices, and prevent leakage or releases of hazardous components to the environment under reasonably foreseeable conditions. [66273.33(d)(1)(B)]
Notification and Reporting Requirements	
<input type="checkbox"/>	Failed to send written notification of universal waste management to the Regional Administrator, and receive an EPA Identification Number, before meeting or exceeding the 5,000 kilogram accumulation limit. [66273.32(a)(1)] Note: However, a large quantity handler of universal waste would <u>not</u> be required to notify U.S. EPA and obtain an EPA ID Number if the total quantity of all universal wastes handled (minus the universal waste electronic devices) does not meet or exceed the 5,000 Kg accumulation limit, <u>and</u> the large quantity handler has submitted the applicable notifications specified in this Article, <u>and</u> the large quantity handler ensures that all universal waste electronic devices handled are managed and recycled in accordance with this Article. [66273.32(a)(3)(A),(B) & (C)]

LIABILITY CERTIFICATE OF INSURANCE

If additional space is needed, add attachment.

Insurer Name: Evanston Insurance Company Insurer Address: 310 Highway 35 South Red Bank NJ 07701 License Number: 35378		Insured Name: ARC International Corp. dba Coastal Corp Insured Address: 680 S. Lemon Avenue City of Industry, CA 91789 Issued by State of: Illinois
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Hazardous Waste Facilities/TTUs Covered:

Hazardous Waste Facilities/TTUs Covered: [Enter Information For Each Facility/TTU]

LIMITS OF LIABILITY

Name	Address	Hazardous Waste Facility/TTU Identification Number	Sudden* Occurrences Each Occurrence/ Annual Aggregate Amount	Nonsudden* Occurrences Each Occurrence/ Annual Aggregate Amount
ARC Int'l Corp. Silicon Valley	2227 Commerce Pl Hayward, CA	CAL000298600	\$5m/\$5m	
ARC Int'l Corp. Los Angeles	333 Turnbull Canyon Rd City of Industry, CA	CAL000315696	\$5m/\$5m	
Policy Number		Effective Date	Total	Total
06PKG01617		11/09/06-07	\$5m/\$5m	

* Excluding legal costs and deductibles

Insurer Certification

1. The Insurer hereby certifies that it has issued liability insurance covering bodily injury and property damage to the Insured in connection with the insured's obligation to demonstrate financial responsibility under California Code of Regulations, title 22, division 4.5, chapter 14 and 15, article 8, sections 66264.147 and 66265.147. The coverage applies at the facilities/transportable treatment units (TTU) listed above for:

sudden accidental occurrences, nonsudden accidental occurrences, or [] both.

The coverage provided by the above policy is

primary coverage excess coverage

If excess coverage, the primary coverage mechanism shall also be demonstrated.

2. The Insurer further certifies the following with respect to the insurance described above:

(a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.

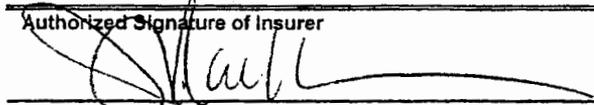
(b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in California Code of Regulations, title 22, division 4.5, chapter 14 and 15, article 8, section 66264.147 and 66265.147.

(c) Whenever requested by the Department of Toxic Substances Control (DTSC), the Insurer agrees to furnish to DTSC a signed duplicate of the original of the policy and all endorsements.

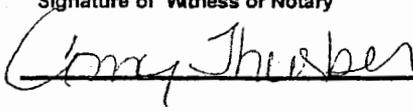
(d) Cancellation of the insurance, whether by the Insurer, the insured, a parent corporation providing insurance coverage for its subsidiary, or by a firm having an insurable interest in and obtaining liability insurance on behalf of the owner or operator of the hazardous waste management facility/TTU will be effective only upon written notice and only after the expiration of 60 days after a copy of such written notice is received by DTSC as evidenced by a duly executed return receipt.

(e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the DTSC as evidenced by a duly executed return receipt.

I hereby certify that the wording of this instrument is identical to the wording specified in California Code of Regulations, title 22, section 66264.151, subsection (j), is being executed in accordance with California Code of Regulations, title 22, division 4.5, chapter 14 and 15, article 8, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more states.

Authorized Signature of Insurer 	Title Vice President
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Typed or Printed Name of Person Signing
Mark G. Brown

Signature of Witness or Notary  Amy Thurber Notary Public of New Jersey Commission Expires October 30, 2007	Date 4/26/2007
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PRIVACY STATEMENT

This information is requested by the Department of Toxic Substances Control under Health and Safety Code section 25245, in order to verify adequate financial assurance of hazardous waste facilities/transportable treatment units (TTU). Completion of the form is mandatory. The consequence of not completing the form is denial of a permit to operate a hazardous waste facility/TTU. Information may be provided to the U. S. Environmental Protection Agency, State Attorney General, Air Resources Board, California Integrated Waste Management Board, Energy Resources Conservation and Development Commission, Water Resources Control Board, and California Regional Water Quality Control Boards. For more information or access to your records, contact the Department of Toxic Substances Control, 8800 Cal Center Drive, Sacramento, California 95826, (916) 255-3545.

LIABILITY ENDORSEMENT

If additional space is needed, add attachment.

Insurer Name: Evanston Insurance Company		Insured Name: ARC International Corp. dbaCoastal Corp.	
Insurer Address: 310 Highway 35 South Red Bank, NJ 07701		Insured Address: 680 S. Lemon Avenue City of Industry, CA 91789	
License Number: 35378	Issued by State of: Illinois		

Hazardous Waste Facilities/TTUs Covered:

Hazardous Waste Facilities/TTUs Covered: [Enter Information For Each Facility/TTU]			LIMITS OF LIABILITY	
Name	Address	Hazardous Waste Facility/TTU Identification Number	Sudden* Occurrences Each Occurrence/ Annual Aggregate Amount	Nonsudden* Occurrences Each Occurrence/ Annual Aggregate Amount
ARC Int'l Corp Silicon Valley	2227 Commerce Pl Hayward, CA	CAL0002986000	\$5m/\$5m	
ARC Int'l Corp Los Angeles	333 Turnbull Canyon Rd City of Industry, CA	CAL000315696	\$5m/\$5m	
Policy Number	Effective Date	Total	Total	
06PKG01617	11/09/06-07	\$5m/\$5m		

* Excluding legal costs and deductibles

Insurer Certification

1. The Insurer hereby certifies that it has issued liability insurance covering bodily injury and property damage to the Insured in connection with the insured's obligation to demonstrate financial responsibility under California Code of Regulations, title 22, division 4.5, chapter 14 and 15, article 8, sections 66264.147 and 66265.147. The coverage applies at the facilities/transportable treatment units (TTU) listed above for:

sudden accidental occurrences, nonsudden accidental occurrences, or both.

The coverage provided by the above policy is

primary coverage excess coverage

If excess coverage, the primary coverage mechanism shall also be demonstrated.

2. The Insurer further certifies the following with respect to the insurance described above:

(a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.

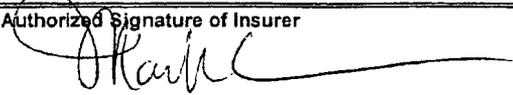
(b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in California Code of Regulations, title 22, division 4.5, chapter 14 and 15, article 8, section 66264.147 and 66265.147.

(c) Whenever requested by the Department of Toxic Substances Control (DTSC), the Insurer agrees to furnish to DTSC a signed duplicate of the original of the policy and all endorsements.

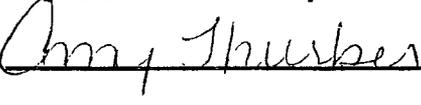
(d) Cancellation of the insurance, whether by the Insurer, the insured, a parent corporation providing insurance coverage for its subsidiary, or by a firm having an insurable interest in and obtaining liability insurance on behalf of the owner or operator of the hazardous waste management facility/TTU will be effective only upon written notice and only after the expiration of 60 days after a copy of such written notice is received by DTSC as evidenced by a duly executed return receipt.

(e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the DTSC as evidenced by a duly executed return receipt.

I hereby certify that the wording of this instrument is identical to the wording specified in California Code of Regulations, title 22, section 66264.151, subsection (j), is being executed in accordance with California Code of Regulations, title 22, division 4.5, chapter 14 and 15, article 8, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more states.

Authorized Signature of Insurer 	Title Vice President
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Typed or Printed Name of Person Signing Mark G. Brown
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Signature of Witness or Notary 	Date 4/26/2007
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Amy Thurber
Notary Public of New Jersey
Commission Expires
October 30, 2007

PRIVACY STATEMENT

This information is requested by the Department of Toxic Substances Control under Health and Safety Code section 25245, in order to verify adequate financial assurance of hazardous waste facilities/transportable treatment units (TTU). Completion of the form is mandatory. The consequence of not completing the form is denial of a permit to operate a hazardous waste facility/TTU. Information may be provided to the U. S. Environmental Protection Agency, State Attorney General, Air Resources Board, California Integrated Waste Management Board, Energy Resources Conservation and Development Commission, Water Resources Control Board, and California Regional Water Quality Control Boards. For more information or access to your records, contact the Department of Toxic Substances Control, 8800 Cal Center Drive, Sacramento, California 95826, (916) 255-3545.

SUMMARY OF OBSERVATIONS

On MARCH 8, 2007, the Department of Toxic Substances Control (DTSC), California Environmental Protection Agency, conducted an inspection at:

Facility Name: ARC INTERNATIONAL CORP.

Facility Address: 333 TURNBULL CANYON RD
CITY OF INDUSTRY, CA 91744

EPA ID Number: CAL 000315696

County Name: LOS ANGELES

Check line below as appropriate

As a result of that inspection, no violations of hazardous waste laws, regulations, and requirements were discovered. ~~DTSC will provide you a complete inspection report within 65 days of the date of this inspection.~~ ^{At the time of} DTSC greatly appreciates the efforts that you have made to comply with the hazardous waste laws and regulations.

As a result of this inspection, the following issue(s) require additional investigation. DTSC will address all unresolved issued in the inspection report. (Use additional paper as necessary.)

NOTE: CRT Level B - CRT vacuum release w/out breaking the CRT glass
UWED Level B - dismantling

Authorized Company Representative

Name [Signature]

Title ENVIRONMENTAL DIRECTOR

Signature [Signature]

Date MARCH 8, 2007

Authorized State Agent

Name ELLEN PATES

Title HAZARDOUS SUBSTANCES SCIENTIST

Signature [Signature]

Date MARCH 8, 2007

SB 20 / Universal Waste (UW) Large Quantity Handler Inspection Report

Facility Name: ARC INTERNATIONAL CORPORATION
 Identification Number: CAL000315696
 Facility Address: 333 TURNBULL CANYON RD
CITY OF INDUSTRY CA 91744
 Date Inspected: MARCH 8, 2007
 Inspected By: EWEN PATES and TOLLU KW
 Type of Inspection: Annual Re-inspection Complaint
 Consent given by: BRUCE CHEN Ag. Chief Operating Officer Time: 10:40 AM
ROD VANPELT - Compliance Mgr. Mike EASTE

DISCLAIMER

This checklist is intended to provide guidance only. This checklist does not replace or supersede relevant statutes and regulations. The information contained in this checklist is based upon the statutes and regulations in effect as of the date the checklist was signed. Interested parties are advised to keep apprised of subsequent changes to relevant statutes and regulations.

Note: Citations that start with the number "66" are to the California Code of Regulations (CCR), title 22, division 4.5. Citations that start with the number "42" are to the Public Resources Code, division 30, part 3, chapter 8.5.

REGULATED FACILITIES AND WASTES

This checklist applies to large quantity handlers of UW electronic devices. "Large Quantity Handler of Universal Waste" is defined as a universal waste handler who accumulates 5,000 kilograms or more total of universal waste (e.g., batteries, thermostats, lamps, etc. calculated collectively) at any time. This designation as a large quantity handler of universal waste is retained through the end of the calendar year in which 5,000 kilograms or more total of universal waste is accumulated. [66273.9]

An electronic device that is listed in California Code of Regulations, Title 22, section 66260.201, subdivision (c) of Appendix X to Chapter 11 shall be managed as a "covered electronic device" under chapter 8.5 of part 3 of division 30 of the Public Resources Code (section 42460 et seq.) unless the manufacturer of the device has obtained the DTSC's concurrence that the device is non hazardous pursuant to subsection (c). [66260.201]

Examples of electronic devices that shall be managed as a "covered electronic device" include, but are not limited to the following: Computers, computer peripherals, telephones, answering machines, radios, stereo equipment, tape players/recorders, phonographs, video cassette players/recorders, compact disc players/recorders, calculators, and some appliances. [66273.9]

Check box if violation: (if checked see attached SOV)

PROHIBITIONS	
<input type="checkbox"/>	Disposed of UW [66273.31(a)]
<input type="checkbox"/>	Diluted or treated universal waste, except by responding to releases as provided in section 66273.37; or by managing specific wastes as provided in section 66273.33. [66273.31(b)]
WASTE MANAGEMENT	
Containment	
<input type="checkbox"/>	Failed to handle any UW electronic devices in a manner that minimizes breakage. [66273.33(d)(1)(A)]
<input type="checkbox"/>	Failed to store (e.g., in containers) UW electronic devices or manage (e.g., stored in a room) whole UW electronic devices in a manner that could reasonably prevent leakage, spillage, damage, or breakage resulting in a release of hazardous components contained within the device. [66273.33(d)(1)(A)]
<input type="checkbox"/>	Failed to immediately clean up and place in a container any UW electronic device that is broken and may reasonably be expected to cause a release of hazardous constituents to the environment. [66273.33(d)(1)(B)]
<input type="checkbox"/>	Failed to ensure that containers used to store broken UW electronic devices that may reasonably be expected to cause a release of hazardous constituents to the environment are structurally sound, compatible with the contents of the universal waste electronic devices, and prevent leakage or releases of hazardous components to the environment under reasonably foreseeable conditions. [66273.33(d)(1)(B)]
Notification and Reporting Requirements	
<input type="checkbox"/>	Failed to send written notification of universal waste management to the Regional Administrator, and receive an EPA Identification Number, before meeting or exceeding the 5,000 kilogram accumulation limit. [66273.32(a)(1)] Note: However, a large quantity handler of universal waste would <u>not</u> be required to notify U.S. EPA and obtain an EPA ID Number if the total quantity of all universal wastes handled (minus the universal waste electronic devices) does not meet or exceed the 5,000 Kg accumulation limit, and the large quantity handler has submitted the applicable notifications specified in this Article, and the large quantity handler ensures that all universal waste electronic devices handled are managed and recycled in accordance with this Article. [66273.32(a)(3)(A),(B) & (C)]

<input type="checkbox"/>	Failed to submit a complete notification [66273.32(b)]
<input type="checkbox"/>	Failed to notify DTSC within 30 days prior of accepting any UW electronic devices from an off-site source after August 6, 2004. [66273.33(d)(2)(A)]
<input type="checkbox"/>	Failed to notify DTSC prior to July 7, 2004, if LQH currently handling UW electronic devices from offsite sources. [66273.33(d)(2)(A)]
<input type="checkbox"/>	Submitted an incomplete notification. [66273.33(d)(2)(A)]
<input type="checkbox"/>	Failed to submit an annual report to DTSC if LQH of UW accepts > 100 kilograms or 220 pounds of UW electronic devices from any off-site source. [66273.33(d)(2)(B)]
<input type="checkbox"/>	Failed to submit a complete report to DTSC by February 1 covering the previous calendar year, commencing February 1, 2005. [66273.33(d)(2)(B)]
<input type="checkbox"/>	Failed to submit electronic notifications and reports to www.dtsc.ca.gov . [66273.33(d)(2)(C)]
<input type="checkbox"/>	Failed to submit written notifications and reports to DTSC by certified mail, return receipt. [66273.33(d)(2)(A)] & [66273.33(d)(2)(D)]
<p>LQH Standards (Note: the following are four separate categories or levels of reclamation that could occur at the LQH facility. "A" contains the least amount of reclamation and "D" the most reclamation. Each category or level will require the LQH to meet different standards. Standards for each category or level are provided below.)</p>	
A.	Removal of any discrete assemblies which are typically removed during the normal operation of the universal waste electronic device (e.g. batteries or ink cartridges) provided the disassembly is conducted in the manner prescribed in the operating manual for the universal waste electronic device or that would otherwise be performed during the normal use of the universal waste electronic device. [66273.33(d)(3)(A)]
B.	Reclamation of components (e.g., circuit boards, integrated circuits, metals, plastic, wiring, batteries, lamps, etc.) through manual disassembly, dismantling, or otherwise manually segregating components for the purposes of directly reusing those components onsite without further processing, or sending those components offsite for direct reuse or further reclamation at another location. [66273.33(d)(3)(B)]

C.	Recycling through the utilization of treatment processes other than manual disassembly for the purposes of directly reusing components onsite without further processing, sending components offsite for direct reuse, or sending components or treatment residuals offsite for further reclamation at another location, and whose recycling or treatment activities produces only hazardous residuals (including finely divided materials) that meet the definition of scrap metal in 66260.10, or which are otherwise exempt from full regulation as hazardous waste. [66273.33(d)(3)(C)]
D.	Recycling through the utilization of treatment processes other than manual disassembly for the purposes of directly reusing components onsite without further processing, sending components offsite for direct reuse, or sending components or treatment residuals offsite for further reclamation at another location, and whose recycling or treatment processes produce any residuals (including bag house and filter dusts) which exhibit any hazardous waste characteristic defined in chapter 11 and do not meet the definition of scrap metal in section 66260.10 (e.g., because they are fine powders or are contaminated with fine powders), or do not qualify for management as universal waste under this chapter. [66273.33(d)(3)(D)]
<p>Treatment or Recycler Standards for LQHs, [that reclaim per (B), (C), or (D) above]</p>	
<input type="checkbox"/>	Failed to notify DTSC no later than 30 days prior to treating or recycling any universal waste electronic devices after August 6, 2004. [66273.33(d)(3)(F)(1)(a)]
<input type="checkbox"/>	Failed to notify DTSC prior to July 7, 2004, if LQH currently treats or recycles UW electronic devices. [66273.33(d)(3)(F)(1)(a)]
<input type="checkbox"/>	Failed to submit a written notification by certified mail, return receipt. [66273.33(d)(3)(F)(1)(a)]
<input type="checkbox"/>	Submitted an incomplete notification. [66273.33(d)(3)(F)(1)(a)]
<input type="checkbox"/>	Failed to prepare and submit an annual report to DTSC. [66273.33(d)(3)(F)(1)(b)]
<input type="checkbox"/>	Failed to submit the annual report by certified mail, return receipt to DTSC by February 1 of each calendar year covering the previous calendar year. [66273.33(d)(3)(F)(1)(b)]
<input type="checkbox"/>	Failed to date and sign the annual report according to the requirements of section 66270.11. [66273.33(d)(3)(F)(1)(b)]
<input type="checkbox"/>	Failed to submit a complete annual report. [66273.33(d)(3)(F)(1)(b)]

Containment of Residuals [per (B), (C), or (D) above]	
<input type="checkbox"/>	Failed to manage all materials produced from the treatment of UW electronic devices in a manner that prevents a release. [66273.33(d)(3)(F)(2)]
<input type="checkbox"/>	Failed to conduct treatment activities over, or in a containment device of sufficient in size and construction. [66273.33(d)(3)(F)(2)(a)]
<input type="checkbox"/>	Failed to contain any residuals in a manner that minimizes breakage and prevents leakage, spillage or damage. [66273.33(d)(3)(F)(2)(b)]
<input type="checkbox"/>	Failed to immediately clean up and place in a container any UW electronic device that is broken and may reasonably be expected to cause a release. [66273.33(d)(3)(F)(2)(c)]
Worker Safety [per (B), (C), or (D) above]	
<input type="checkbox"/>	Failed to be familiar with the hazards associated with UW electronic device treatment activities. [66273.33(d)(3)(F)(3)(a)]
<input type="checkbox"/>	Failed to have access to the proper procedures and protective equipment necessary to safely conduct UW electronic device treatment activities and to comply with the requirements of this section. [66273.33(d)(3)(F)(3)(a)]
<input type="checkbox"/>	Failed to ensure that the facility is operated in compliance with all applicable worker health and safety laws and regulations (i.e., California Code of Regulations, title 8). [66273.33(d)(3)(F)(2)(b)]
Zoning [per (B), (C), or (D) above]	
<input type="checkbox"/>	Failed to ensure that the treatment activities conducted at the facility are consistent with local zoning and land use requirements for that location. [66273.33(d)(3)(F)(4)]
Management of Residuals [per (B), (C), or (D) above]	
<input type="checkbox"/>	Failed to ensure that all materials produced as a result of the treatment processes are properly classified and managed in accordance with any applicable requirements of this division. [66273.33(d)(3)(F)(5)]
Management Standards [per (C), or (D) above]	
<input type="checkbox"/>	Failed to use only treatment methods that employ one or more of the following technologies: [66273.33(d)(3)(F)(6)(a)] Physical processes that change only the physical properties of the waste such as cutting, sawing, breaking, shredding, crushing, grinding, screening, sieving, acceleration, or compacting; [66273.33(d)(3)(F)(6)(a)(1)] AND/OR Separation based on differences in physical properties such as size, color, density, or ferromagnetism. [66273.33(d)(3)(F)(6)(a)(2)]

<input type="checkbox"/>	Failed to ensure all mercury containing lamps and other components which contain fluids (i.e., liquids or gasses) that would be identified as hazardous waste were removed prior to processing. [66273.33(d)(3)(F)(6)(a)(3)]
<input type="checkbox"/>	Allowed processing of universal waste electronic devices containing PCB ballasts, medical or bio-hazardous wastes, radioactive materials, reactive materials, or ignitable materials. [66273.33(d)(3)(F)(6)(a)(4)]
<input type="checkbox"/>	Failed to ensure the treatment is conducted without the use or application of: [66273.33(d)(3)(F)(6)(b)] Chemicals, including water; [66273.33(d)(3)(F)(6)(b)(1)] External heat. [66273.13(d)(3)(F)(6)(b)(2)]
<input type="checkbox"/>	Failed to ensure that all hazardous wastes generated from treatment activities that are sent offsite for disposal are manifested. [66273.33(d)(3)(F)(6)(c)]
<input type="checkbox"/>	Failed to ensure that all treatment residuals meeting the definition of scrap metal in section 66260.10 are recycled. [66273.33(d)(3)(F)(6)(d)]
<input type="checkbox"/>	Accept for treatment, any universal waste electronic devices that are managed, or are required to be managed, as hazardous waste under chapters 10 through 22 of this division unless authorized to do so under hazardous waste management permit or other grant of authorization. [66273.33(d)(3)(F)(6)(e)]
<input type="checkbox"/>	Failed to comply with the requirements of sections 66265.18 and 66265.25 of chapter 15 as those requirements apply to facility location and design standards. [66273.33(d)(3)(F)(6)(f)]
<input type="checkbox"/>	Failed to ensure that all treatment is conducted in compliance with all applicable local and state air pollution control laws and regulations. [66273.33(d)(3)(F)(6)(g)]
<input type="checkbox"/>	Failed to conduct treatment only for the purposes of recycling one or more types of universal waste electronic devices. [66273.33(d)(3)(F)(6)(h)]
<input type="checkbox"/>	Failed to maintain on file copies of the most recent notifications and reports submitted to DTSC and a copy of any local air district permit and other permits required for the facility no later than 30 days prior to recycling or treating any UW waste electronic devices. [66273.33(d)(3)(F)(6)(i)]
<input type="checkbox"/>	Failed to make documents available to any representative of DTSC, the U. S. EPA, or a local governmental agency. [66273.33(d)(3)(F)(6)(i)]

<input type="checkbox"/>	Failed to deliver documents by person or by certified mail, return receipt requested, to DTSC when requested in writing. [66273.33(d)(3)(F)(6)(i)]
<input type="checkbox"/>	Failed to submit a written notification to DTSC no later than 30 days after ceasing treatment or recycling activities at the facility. [66273.33(d)(3)(F)(6)(j)]
<input type="checkbox"/>	Failed to submit a written notification to DTSC by certified mail, return receipt. [66273.33(d)(3)(F)(6)(j)]
<input type="checkbox"/>	Submitted an incomplete notification. [66273.33(d)(3)(F)(6)(j)]
Treatment Standards [per (D) above]	
<input type="checkbox"/>	Failed to prepare and submit to DTSC a written estimate of a cost for closure no later than 30 days prior to initially recycling or treating any universal waste electronic devices. [66273.33(d)(3)(F)(7)]
<input type="checkbox"/>	Failed to submit a written estimate of the facility closure cost by certified mail, return receipt. [66273.33(d)(3)(F)(7)(a)]
<input type="checkbox"/>	Submitted an incomplete closure cost estimate pursuant to the requirements specified in section 66265.142. [66273.33(d)(3)(F)(7)(a)]
<input type="checkbox"/>	Failed to evaluate, and adjust if necessary, the closure cost estimate annually to reflect changes in closing cost. [66273.33(d)(3)(F)(7)(a)]
<input type="checkbox"/>	Failed to submit to DTSC written documentation demonstrating financial assurance for closure no later than 30 days prior to initially recycling or treating any universal waste electronic devices [66273.33(d)(3)(F)(7)(b)]
<input type="checkbox"/>	Failed to submit written documentation demonstrating financial assurance for closure by certified mail, return receipt. [66273.33(d)(3)(F)(7)(b)]
<input type="checkbox"/>	Submitted incomplete documentation demonstrating financial assurance for closure pursuant to section 66265.143. [66273.33(d)(3)(F)(7)(b)]
<input type="checkbox"/>	Failed to submit to DTSC documentation demonstrating financial responsibility for liability no later than 30 days prior to initially recycling or treating any universal waste electronic devices [66273.33(d)(3)(F)(7)(c)]
<input type="checkbox"/>	Failed to submit documentation demonstrating financial responsibility for liability by certified mail, return receipt. [66273.33(d)(3)(F)(7)(c)]

<input type="checkbox"/>	Submitted complete documentation demonstrating financial responsibility for liability pursuant to section 66265.147. [66273.33(d)(3)(F)(7)(c)]
LABELING/MARKING	
<input type="checkbox"/>	Failed to properly label or clearly mark each container or pallet in or on which UW electronic devices are contained, including containers or pallets that also contain devices with one of the following phrases: "Universal Waste—Consumer Electronic Device(s)" or "UW—Consumer Electronic Device(s)." [66273.34(d)]
AND	
<input type="checkbox"/>	Failed to accumulate universal waste electronic devices within a designated area demarcated by boundaries that are clearly labeled. [66273.34(d)(1)]
ACCUMULATION TIME LIMITS	
<input type="checkbox"/>	Accumulated universal waste for longer than one year from the date the universal waste is generated, or received from another handler, unless the requirements of subsection (b) of these sections are met. [66273.35]
<input type="checkbox"/>	Failed to mark or label the length of time that the universal waste has been accumulated from the date it becomes a waste or is received. [66273.35(c)]
OR	
<input type="checkbox"/>	Failed to maintain an inventory system on-site that identifies the date each universal waste became a waste or was received. [66273.35(c)(1)&(2)]
OR	
<input type="checkbox"/>	Failed to maintain an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers of universal waste became a waste or was received. [66273.35(c)(3)&(4)]
OR	
<input type="checkbox"/>	Failed to place UW in a specific accumulation area and identifying the earliest date that any universal waste in the area became a waste or was received. [66273.35(c)(5)]
EMPLOYEE TRAINING	
<input type="checkbox"/>	Failed to provide training to ensure that all employees who handle or have responsibility for managing universal waste are thoroughly familiar with proper waste handling and emergency procedures, relative to their responsibilities during normal facility operations and emergencies. [66273.36]

RESPONSE TO RELEASE	
<input type="checkbox"/>	Failed to immediately contain all releases of universal wastes and other residues from universal wastes. [66273.37(a)]
<input type="checkbox"/>	Failed to determine whether any material resulting from the release is hazardous waste, and if so, manage the hazardous waste in compliance with all applicable requirements of this division. [66273.37(b)]
<input type="checkbox"/>	Failed to properly repackage waste consisting only of residues of leaking, broken, or otherwise damaged universal waste. [66273.37(c)]
OFF-SITE SHIPMENTS	
<input type="checkbox"/>	Sent or delivered UW to a place other than another UW handler, a destination facility, or a foreign destination. [66273.18(a)]
<input type="checkbox"/>	Failed to comply with transporter requirements while self-transporting the universal waste. [66273.38(b)]
<input type="checkbox"/>	Failed to package, label, mark and placard the shipment, and prepare the proper shipping papers for UW offered for off-site transportation that meets the definition of hazardous materials under 49 CFR parts 171 through 180. [66273.38(c)]
<input type="checkbox"/>	Failure to ensure that the receiving handler agrees to receive the shipment from the originating handler prior to sending a shipment. [66273.38(d)]
<input type="checkbox"/>	Failure to either receive the UW back, or agree with the receiving handler on a destination facility to which the shipment will be sent, if the UW is rejected by the receiving handler or destination facility. [66273.38(e)(1)&(2)]
<input type="checkbox"/>	Failed to notify the originating handler to discuss reshipment, if the receiving handler rejects a shipment containing UW, or a portion of a shipment containing UW. [66273.38(f)(1)&(2)]
<input type="checkbox"/>	Failed to immediately notify DTSC of the illegal shipment, and provide the name, address, and phone number of the originating shipper if the facility receives a shipment containing hazardous waste that is not a universal waste. [66273.38(g)]
TRACKING UW SHIPMENTS	
<input type="checkbox"/>	Failed to keep a record of each shipment of universal waste <u>received</u> at the facility. [66273.39(a)]
<i>Failed to record any of the following information:</i>	
<input type="checkbox"/>	The name and address of the originating universal waste handler or foreign shipper from whom the universal waste was sent; [66273.39(a)(1)]

<input type="checkbox"/>	The quantity of each type of universal waste received (e.g., batteries, thermostats, lamps, mercury switches, etc.); [66273.39(a)(2)]
<input type="checkbox"/>	The date of receipt of the shipment of universal waste. [66273.39(a)(3)]
<input type="checkbox"/>	Failed to keep a record of each shipment of universal waste <u>sent</u> from the handler to off-site facilities. [66273.39(b)]
<i>Failed to record any of the following information:</i>	
<input type="checkbox"/>	The name and address of the universal waste handler, destination facility, or foreign destination to whom the universal waste was sent; [66273.39(b)(1)]
<input type="checkbox"/>	The quantity of each type of universal waste sent (e.g., batteries, thermostats, lamps, mercury switches, etc.); [66273.39(b)(2)]
<input type="checkbox"/>	The date the shipment of universal waste left the facility. [66273.39(b)(3)]
<input type="checkbox"/>	Failed to retain the records described in subsection (a) of this section for at least three years from the date of receipt of a shipment of universal waste; [66273.39(c)(1)]
<input type="checkbox"/>	Failed to retain the records described in subsection (b) of this section for at least three years from the date a shipment of universal waste left the facility. [66273.39(c)(2)]
EXPORT	
<input type="checkbox"/>	Failed to comply with the requirements applicable to a primary exporter in section 66262.53, 66262.56(a) (1) through (4), (6), and (b) and 66262.57; [66273.40(a)] [Note: Export to OECD countries specified in section 66262.58(a)(1) are subject to the requirements of article 8 of chapter 12]
AND	
<input type="checkbox"/>	Failed to obtain the consent of the receiving country and in conformance with the EPA Acknowledgement of Consent as defined in article 5 of chapter 12; and [66273.40(b)]
AND	
<input type="checkbox"/>	Failed to provide a copy of the EPA Acknowledgment of Consent for the shipment to the transporter transporting the shipment for export. [66273.40(c)]
<input type="checkbox"/>	Failed to notify DTSC and concurrently send a copy of that notification to the CUPA of an intended export before such consumer electronic device is scheduled to leave the United States. A completed notification shall be submitted four weeks before the initial shipment is intended to be shipped offsite. This notification shall cover export activities extending over a twelve (12) month or lesser period. [66273.40(d)]

Failed to include all of the following information:
[66273.40(e)]

<input type="checkbox"/>	Name, mailing address, and telephone number of the universal waste handler; [66273.40(e)(1)]
<input type="checkbox"/>	The foreign destination, for each type of consumer electronic device; [66273.40(e)(2)]
<input type="checkbox"/>	The amount of consumer electronic devices (by count or by weight); [66273.40(e)(2)(A)]
<input type="checkbox"/>	The estimated frequency or rate at which the consumer electronic device is to be exported and the period of time over which the consumer electronic device is to be exported; [66273.40(e)(2)(B)]
<input type="checkbox"/>	All points of entry to and departure from each foreign country through which the consumer electronic device will pass; [66273.40(e)(2)(C)]
<input type="checkbox"/>	A description of the means by which each shipment of consumer electronic devices will be recycled at the foreign destination; and [66273.40(e)(2)(D)]
<input type="checkbox"/>	The name and site address of the consignee or any alternate consignee. [66273.40(e)(2)(E)]
<input type="checkbox"/>	Failed to send the notifications submitted under subsection (d) of this section to DTSC, Hazardous Waste Management Program, State Regulatory Programs Division, P.O. Box 806, Sacramento, CA 95812-0806, with "Attention: Notification to Export Consumer Electronic Devices" prominently displayed on the front of the envelope. [66273.40(f)]

COMMENTS:

NOTE: The inspector shall also note in this section a description of all violations that were observed and corrected during the inspection.

See Summary of Observation
DTSC inspected facility for universal
CRT level 1 treatment activity.
No violations found.

Cathode Ray Tube (CRT) Material Handler (MH) Inspection Report

Facility Name: ARC INTERNATIONAL CORPORATION
 Identification Number: CAL000273749 ^{EIP 3/15/07} 315696
 Facility Address: 333 TURNBULL CANYON ROAD
CITY OF INDUSTRY, CA.
 Date Inspected: MARCH 9, 2007
 Inspected By: ELLEN PATES and TOLU AWOGIKA
 Type of Inspection: Annual Re-inspection Complaint
 Consent given by: BRUCE CHEN Asst. Chief Operat. Officer Time: 10:20 AM
ROD VANPELT - Compliance Mgr MIKE EASTERBROOK - Asst. Compliance Coord

DISCLAIMER

This checklist is intended to provide guidance only. This checklist does not replace or supersede relevant statutes and regulations. The information contained in this checklist is based upon the statutes and regulations in effect as of the date the checklist was signed. Interested parties are advised to keep apprised of subsequent changes to relevant statutes and regulations.

Citations that start with the number "66" are to the California Code of Regulations (CCR), title 22, division 4.5. Citations that start with the number "42" are to the Public Resources Code, division 30, part 3, chapter 8.5.

If the CRT Recycler is a permitted Hazardous Waste (HW) Facility, the inspector shall contact DTSC staff responsible for maintaining that facility's permit to determine if additional requirements apply to CRT activities carried out at the facility.

REGULATED WASTES

CRTs (AKA covered electronic devices) are defined as a cathode ray tube, cathode ray tube device, flat panel screen, or any other similar video display device with a screen size that is greater than four inches in size measured diagonally and which the DTSC determines, when discarded or disposed, would be a hazardous waste pursuant to Chapter 6.5 (commencing with Section 25100) of Division 20 of the Health and Safety Code. [42463(f)(1)]

Check box if violation: (if checked see attached SOV)

PROHIBITIONS	
<input type="checkbox"/>	Disposed of a CRT material. [66273.81(a)]
<input type="checkbox"/>	Diluted or treated a CRT material unless requirements of this section are met. [66273.81(b)]
NOTIFICATION & ANNUAL REPORT	
<input type="checkbox"/>	Failed to notify DTSC at least 30 days prior to accepting any CRT materials from an offsite source. [66273.82(a)]
<input type="checkbox"/>	Failed to submit an annual report to DTSC, if CRT MH accepted >5 CRTs, >5 CRT devices, or >100 kg of CRT glass per calendar year from any offsite source. [66273.82(b)(2)]
<input type="checkbox"/>	Failed to submit annual report to DTSC, if CRT MH generates ≥5,000 kg of CRT material per calendar year. [66273.82(b)(3)]
<input type="checkbox"/>	Failed to submit written annual report to DTSC by February 1 of each calendar year. [66273.82(b)]
<input type="checkbox"/>	Submitted an incomplete notification or annual report. [66273.82(a) & (b)(4)]
<input type="checkbox"/>	A CRT MH who performs data conversions derived from mass data failed to include the conversion factor(s) in the annual report. [66273.82(c)]
<input type="checkbox"/>	Failed to submit a written notification or annual report by certified mail, return receipt. [66273.82(d)]

WASTE MANAGEMENT	
<input type="checkbox"/>	Failed to contain any CRT materials in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the container. [66273.83(a)(1)]
<input type="checkbox"/>	Failed to immediately clean up and place in a container any CRT material that is broken or shows evidence of breakage, leakage, or damage. [66273.83(a)(2)]
<input type="checkbox"/>	Failed to safely remove CRTs from CRT devices. [66273.83(b)(1)]
<input type="checkbox"/>	Failed to determine whether any of the remaining portions of the CRT device or any other waste generated during the removal process exhibits any characteristic of a HW. [66273.83(b)(2)]
YOKE REMOVAL	
<input type="checkbox"/>	Failed to remove yoke without breaking CRT glass and MH does not meet treatment/recycling standards. [66273.83(c)(1)]
<input type="checkbox"/>	Failed to submit complete notification by certified mail regarding yoke removal. [66273.83(c)(2)]
<input type="checkbox"/>	Failed to maintain notification, air permit and other permits (as required), and produce these documents when requested. [66273.83(c)(3)]

<input type="checkbox"/>	Failed to submit the annual report to DTSC by February 1 of each calendar year and by certified mail. [66273.83(c)(4)]
<input type="checkbox"/>	Accepted CRTs or CRT devices that are managed, or are required to be managed as hazardous waste. [66273.83(c)(5)]
<input type="checkbox"/>	Failed to conduct treatment for the purpose of recycling the CRTs or CRT devices. [66273.83(c)(6)]
<input type="checkbox"/>	Failed to ensure all treatment is conducted over or in a containment device sufficient in size and construction to contain any CRT glass that may be released during yoke removal. [66273.83(c)(7)]
<input type="checkbox"/>	Failed to utilize only mechanical methods to remove the yoke. [66273.83(c)(8)]
<input type="checkbox"/>	Used heat, chemicals, or water in yoke removal process. [66273.83(c)(9)]
<input type="checkbox"/>	Failed to ensure that all persons that perform treatment are thoroughly familiar with hazards and have access to proper procedures and protective equipment necessary to safely conduct treatment and to comply with applicable requirements. [66273.83(c)(10)]
<input type="checkbox"/>	Failed to ensure that the facility is operated in compliance with all applicable local and state air pollution control laws and regulations. [66273.83(c)(11)]
<input type="checkbox"/>	Failed to ensure that the facility is operated in compliance with all applicable worker health and safety laws and regulations. [66273.83(c)(12)]
<input type="checkbox"/>	Failed to ensure that all materials generated as a result of the treatment processes are classified and managed properly. [66273.83(c)(13)]
<input type="checkbox"/>	Failed to ensure that the activities conducted at the facility are consistent with local zoning or land use requirements. [66273.83(c)(14)]
<input type="checkbox"/>	Failed to maintain compliance with location, seismic, and precipitation design standards requirements. [66273.83(c)(15)]
	CRT TREATMENT OR RECYCLING
<input type="checkbox"/>	Failed to notify DTSC no later than 30 days prior to treating or recycling the CRT material. [66273.83(d)(1)(A)(1)]
<input type="checkbox"/>	Failed to notify DTSC no later than 30 days prior to ceasing treatment or recycling activities. [66273.83(d)(1)(A)3]
<input type="checkbox"/>	Failed to notify the DTSC no later than 30 days after ceasing treatment or recycling activities. [66273.83(d)(1)(A)3]
<input type="checkbox"/>	Failed to complete notification and sign, and date notification as specified in title 22 CCR 66270.11. [66273.83(d)(1)(A)2, 4, 5 and 66273.83(d)(1)(B)]

<input type="checkbox"/>	Failed to submit to DTSC by certified mail a cost estimate for closure no later than 30 days prior to recycling or treating CRT materials. [66273.83(d)(2)]
<input type="checkbox"/>	Failed to submit to DTSC documentation demonstrating financial assurance for closure no later than 30 days prior to recycling or treating. [66273.83(d)(3)]
<input type="checkbox"/>	Failed to submit to DTSC documentation demonstrating financial responsibility for liability no later than 30 days prior to recycling or treating. [66273.83(d)(4)]
<input type="checkbox"/>	Failed to maintain on file the most recent notification and air permit (if required) and produce these records when requested. [66273.83(d)(5)]
<input type="checkbox"/>	Failed to prepare and submit an annual report to DTSC by February 1 of each calendar year. [66273.83(d)(6)]
<input type="checkbox"/>	Submitted an incomplete annual report. [66273.83(d)(6)]
<input type="checkbox"/>	Accepted any CRT material that is managed, or is required to be managed, as HW. [66273.83(d)(7)]
<input type="checkbox"/>	Conducted the treatment for the purpose of recycling one or more types of CRT glass and failed to reclaim the CRT glass at a CRT glass manufacturer or at a primary or secondary lead smelter. [66273.83(d)(8)]
<input type="checkbox"/>	Failed to ensure all treatment is conducted over or in a containment device sufficient in size and construction to contain any CRT glass that may be released. [66273.83(d)(9)]
<input type="checkbox"/>	Failed to utilize specified treatment methods [66273.83(d)(10)]
<input type="checkbox"/>	Conducted treatment using chemicals or external heat other than specified in regulation. [66273.83(d)(11)]
<input type="checkbox"/>	Failed to ensure that the facility is operated in compliance with all applicable local and state air pollution control laws and regulations. [66273.83(d)(13)]
<input type="checkbox"/>	Failed to ensure that the facility is operated in compliance with all applicable worker health and safety laws and regulations. [66273.83(d)(14)]
<input type="checkbox"/>	Failed to ensure that all materials generated as a result of the treatment processes are properly classified and managed. [66273.83(d)(15)]
<input type="checkbox"/>	Failed to ensure that the activities conducted at the facility are consistent with local zoning or land use requirements. [66273.83(d)(16)]
<input type="checkbox"/>	Failed to maintain compliance with location standards and seismic and precipitation design standards requirements. [66273.83(d)(17)]

LABELING/MARKING	
<input type="checkbox"/>	Failed to properly label or clearly mark each container or pallet in or on which CRTs, CRT devices or CRT glass are contained. [66273.84]
<input type="checkbox"/>	Failed to properly label a designated area where CRTs and CRT devices are accumulated within demarcated boundaries. [66273.84)(d)]
<input type="checkbox"/>	Stored CRTs and CRT devices along with other materials in designated CRT accumulation areas. [66273.84)(d)]
ACCUMULATION TIME LIMITS	
<input type="checkbox"/>	Accumulated CRT material for more than one year from the date the universal waste (UW) is generated, or received from another handler. [66273.85(a)]
<input type="checkbox"/>	Failed to demonstrate the length of time that the UW has been accumulated from the date it became a waste or was received. [66273.85(b)]
EMPLOYEE TRAINING	
<input type="checkbox"/>	Failed to ensure that persons removing CRTs are thoroughly familiar with the techniques and safety precautions required to safely remove CRTs. [66273.83(b)(1)(C)]
<input type="checkbox"/>	Failed to ensure that all persons that perform treatment or recycling are thoroughly familiar with the associated hazards and have access to the proper procedures and protective equipment necessary to safely conduct the treatment. [66273.83(d)(12)]
<input type="checkbox"/>	Failed to inform all employees who handle or have responsibility for managing CRT material of the proper handling and emergency procedures. [66273.86(a)]
<input type="checkbox"/>	Employees who manage or handle waste CRT materials failed to receive specified initial training. [66273.86(b)]
<input type="checkbox"/>	Employees failed to take part in annual review of the initial training. [66273.86(c)]
RESPONSE TO RELEASES	
<input type="checkbox"/>	Failed to immediately contain all releases of CRT material and residues from CRT material. [66273.87(a)]
<input type="checkbox"/>	Failed to determine whether any material resulting from a release is a HW. [66273.87(b)]
<input type="checkbox"/>	Failed to manage any material determined to be HW as HW. [66273.87(b)]
<input type="checkbox"/>	Managed residues of leaking, broken, or damaged CRT material as UW without repackaging according to applicable standards. [66273.87(c)]

OFF-SITE SHIPMENTS	
<input type="checkbox"/>	Sent or took CRT material to a place other than another CRT MH, a destination facility, or a foreign destination. [66273.88(a)]
<input type="checkbox"/>	A CRT MH that transports CRT material off-site failed to comply with the UW transporter requirements. [66273.88(b)]
<input type="checkbox"/>	A CRT MH that offers CRT material that meets the definition of a hazardous material for off-site transportation failed to package, label, mark and placard the shipment according to applicable United States Department of Transportation (U.S DOT) regulations. [66273.88(c)]
<input type="checkbox"/>	The originating CRT MH failed to obtain an agreement from the receiving CRT MH prior to sending a shipment of CRT material. [66273.88(d)]
<input type="checkbox"/>	The originating CRT MH failed to follow rejected load procedures. [66273.88(e)]
<input type="checkbox"/>	The receiving CRT MH that rejects a shipment of CRT material failed to follow rejected load procedures. [66273.88(f)]
<input type="checkbox"/>	A CRT MH that receives a shipment of CRT material containing HW failed to notify DTSC of the shipment. [66273.88(g)]
<input type="checkbox"/>	A CRT MH that receives a shipment of non-hazardous, non-UW, failed to manage the waste in compliance with applicable federal, state, and local solid waste regulations. [66273.88(h)]
EXPORT	
<input type="checkbox"/>	Failed to notify DTSC four weeks before the intended initial shipment of CRT material to any foreign destination. [66273.90(a)]
<input type="checkbox"/>	Failed to notify CUPA of the intended export. [66273.90(a)]
<input type="checkbox"/>	Submitted an incomplete notification. [66273.90(b)]
<input type="checkbox"/>	Failed to notify the DTSC at least 60 days prior to export, the destination, contents, and volume of covered electronic waste (e-waste) to be exported to any foreign destination. [42476.5(a)]
<input type="checkbox"/>	Failed to demonstrate that the importation of covered e-waste is not prohibited by any applicable law or regulation of the country of destination and that any import is conducted in accordance with all applicable laws. [42476.5(b)]
<input type="checkbox"/>	Failed to forward required import and operating licenses to the DTSC. [42476.5(b)]

<input type="checkbox"/>	Failed to demonstrate that the exportation of covered e-waste is conducted only in accordance with applicable international law. [42476.5(c)]
<input type="checkbox"/>	Failed to demonstrate that the management of the exported covered e-waste will be handled within the country of destination in accordance with applicable rules, standards, and requirements adopted by the Organization for Economic Cooperation and Development (OECD) for the environmentally sound management of e-waste. [42476.5(d)]
<input type="checkbox"/>	Failed to demonstrate that the covered e-waste is being exported for the purpose of reuse or recycling. [42476.5(e)]
RECORDKEEPING	
<input type="checkbox"/>	Failed to maintain a copy of any local air district permits and other permits required for the facility no later than 30 days prior to recycling or treating any CRT material. [66273.83(d)(5)(B)]
<input type="checkbox"/>	Failed to maintain records of employee training received for at least three years from the date the employee last worked at the facility. [66273.86(d)]
<input type="checkbox"/>	Incomplete shipment record of CRT material received. [66273.89(a)]
<input type="checkbox"/>	Incomplete shipment record of CRT material sent. [66273.89(b)]

COMMENTS:

NOTE: The inspector shall also note in this section a description of all violations that were observed and corrected during the inspection.

See Summary of Observations
 DTSC inspected facility for
 UNED and CRT Level B
 treatment activity.
 No violation found.

SUMMARY OF VIOLATIONS

On January 23, 2007, the Department of Toxic Substances Control (DTSC), California Environmental Protection Agency, conducted an inspection at:

Facility Name: ARC International Corporation

Facility Address: 333 Turnbull Canyon Road, City of Industry
CA. 91744

EPA ID Number: CAL000273749 / CAR000145714

County Name: Los Angeles

As a result of that inspection, the 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. If you disagree with any of the violations listed in Section I, you must give the inspector who issued the Notice to Comply a written notice of disagreement.

You must correct the violations listed in Section III: Minor Violations, within 30 days. Within five working days of achieving compliance, you must sign the statement certifying compliance at the bottom of Section III and return it to DTSC at the address 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 violation. DTSC may reinspect this facility at any time. *(Will re-inspect once facility starts Level D treatment)*

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 or the findings of the report. 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 that have not been corrected within the time provided in the Notice to comply.

Company Representative Accepting Summary

Department Representative

Name Ray Ritchey

Name Ellen Pates

Title Dir. of Compliance (Acting)

Title Hazardous Substances Scientist

Signature [Signature]

Signature [Signature]

Date 1/23/07

Date 1/23/07

SUMMARY OF VIOLATIONS

Facility Name: ARC International Corporation Date: January 23, 2007

SECTION III: MINOR VIOLATIONS/NOTICE TO COMPLY
(Minor Violations not corrected at time of inspection.)

You must correct the following violation(s) within 30 days. (Not to exceed thirty days).
Within five working days of achieving compliance, you are required to sign the certification
below, and return it DTSC at the following address: 1011 N. Grandview Avenue
Glendale, CA. 91201

① TRAINING

On January 23, 2007, ARC International violated California Code of Regulation (CCR), Title 22, section 66273.36 and 66273.86(a) for failure to provide training who have responsibility for managing CRT/^{UWED} materials of the property handling.

Evidence: Sunny Young (Chief Operating Officer) No records provided

Schedule of Compliance: w/in 30 days ARC shall provide training who have responsibility for managing CRT/^{UWED}s materials of proper handling.

② LABELING

On Jan 23, 2007, ARC International Corp violated CCR, Title 22, section 66273.89 and 66273.3A(d) for failure to label or mark pallets containing CRT's and UWED's.

Evidence: Photographs

Schedule of Compliance: w/in 30 days ARC shall label all containers or pallets w/ CRT's or UWED's.

I certify under penalty of law that the above corrective actions have been taken and the violations have been corrected. I am aware that there are significant penalties for submitting false information.

Signature _____ Date: _____

Title _____

SB 20 / Universal Waste (UW) Large Quantity Handler Inspection Report

Facility Name: ARC International Corporation
 Identification Number: CAL 000273749 / CAR 000145714
 Facility Address: 333 Turnbull Canyon Road
City of Industry, CA. 91744
 Date Inspected: January 23, 2007
 Inspected By: Ellen Pates + Jessica Rodriguez
 Type of Inspection: Annual Re-inspection Complaint
 Consent given by: Ray R. Heagy Time: 11:10 AM

DISCLAIMER

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Note: Citations that start with the number "66" are to the California Code of Regulations (CCR), title 22, division 4.5. Citations that start with the number "42" are to the Public Resources Code, division 30, part 3, chapter 8.5.

REGULATED FACILITIES AND WASTES

This checklist applies to large quantity handlers of UW electronic devices. "Large Quantity Handler of Universal Waste" is defined as a universal waste handler who accumulates 5,000 kilograms or more total of universal waste (e.g., batteries, thermostats, lamps, etc. calculated collectively) at any time. This designation as a large quantity handler of universal waste is retained through the end of the calendar year in which 5,000 kilograms or more total of universal waste is accumulated. [66273.9]

An electronic device that is listed in California Code of Regulations, Title 22, section 66260.201, subdivision (c) of Appendix X to Chapter 11 shall be managed as a "covered electronic device" under chapter 8.5 of part 3 of division 30 of the Public Resources Code (section 42460 et seq.) unless the manufacturer of the device has obtained the DTSC's concurrence that the device is non hazardous pursuant to subsection (c). [66260.201]

Examples of electronic devices that shall be managed as a "covered electronic device" include, but are not limited to the following:

Computers, computer peripherals, telephones, answering machines, radios, stereo equipment, tape players/recorders, phonographs, video cassette players/recorders, compact disc players/recorders, calculators, and some appliances. [66273.9]

Check box if violation: (if checked see attached SOV)

PROHIBITIONS	
<input type="checkbox"/>	Disposed of UW [66273.31(a)]
<input type="checkbox"/>	Diluted or treated universal waste, except by responding to releases as provided in section 66273.37; or by managing specific wastes as provided in section 66273.33. [66273.31(b)]
WASTE MANAGEMENT	
Containment	
<input type="checkbox"/>	Failed to handle any UW electronic devices in a manner that minimizes breakage. [66273.33(d)(1)(A)]
<input type="checkbox"/>	Failed to store (e.g., in containers) UW electronic devices or manage (e.g., stored in a room) whole UW electronic devices in a manner that could reasonably prevent leakage, spillage, damage, or breakage resulting in a release of hazardous components contained within the device. [66273.33(d)(1)(A)]
<input type="checkbox"/>	Failed to immediately clean up and place in a container any UW electronic device that is broken and may reasonably be expected to cause a release of hazardous constituents to the environment. [66273.33(d)(1)(B)]

<input type="checkbox"/>	Failed to ensure that containers used to store broken UW electronic devices that may reasonably be expected to cause a release of hazardous constituents to the environment are structurally sound, compatible with the contents of the universal waste electronic devices, and prevent leakage or releases of hazardous components to the environment under reasonably foreseeable conditions. [66273.33(d)(1)(B)]
Notification and Reporting Requirements	
<input type="checkbox"/>	Failed to send written notification of universal waste management to the Regional Administrator, and receive an EPA Identification Number, before meeting or exceeding the 5,000 kilogram accumulation limit. [66273.32(a)(1)] Note: However, a large quantity handler of universal waste would <u>not</u> be required to notify U.S. EPA and obtain an EPA ID Number if the total quantity of all universal wastes handled (minus the universal waste electronic devices) does not meet or exceed the 5,000 Kg accumulation limit, <u>and</u> the large quantity handler has submitted the applicable notifications specified in this Article, <u>and</u> the large quantity handler ensures that all universal waste electronic devices handled are managed and recycled in accordance with this Article. [66273.32(a)(3)(A),(B) & (C)]

<input type="checkbox"/>	Failed to submit a complete notification [66273.32(b)]
<input type="checkbox"/>	Failed to notify DTSC within 30 days prior of accepting any UW electronic devices from an off-site source after August 6, 2004. [66273.33(d)(2)(A)]
<input type="checkbox"/>	Failed to notify DTSC prior to July 7, 2004, if LQH currently handling UW electronic devices from offsite sources. [66273.33(d)(2)(A)]
<input type="checkbox"/>	Submitted an incomplete notification. [66273.33(d)(2)(A)]
<input type="checkbox"/>	Failed to submit an annual report to DTSC if LQH of UW accepts > 100 kilograms or 220 pounds of UW electronic devices from any off-site source. [66273.33(d)(2)(B)]
<input type="checkbox"/>	Failed to submit a complete report to DTSC by February 1 covering the previous calendar year, commencing February 1, 2005. [66273.33(d)(2)(B)]
<input type="checkbox"/>	Failed to submit electronic notifications and reports to www.dtsc.ca.gov . [66273.33(d)(2)(C)]
<input type="checkbox"/>	Failed to submit written notifications and reports to DTSC by certified mail, return receipt. [66273.33(d)(2)(A)] & [66273.33(d)(2)(D)]
LQH Standards (Note: the following are four separate categories or levels of reclamation that could occur at the LQH facility. "A" contains the least amount of reclamation and "D" the most reclamation. Each category or level will require the LQH to meet different standards. Standards for each category or level are provided below.)	
A.	Removal of any discrete assemblies which are typically removed during the normal operation of the universal waste electronic device (e.g. batteries or ink cartridges) provided the disassembly is conducted in the manner prescribed in the operating manual for the universal waste electronic device or that would otherwise be performed during the normal use of the universal waste electronic device. [66273.33(d)(3)(A)]
B.	Reclamation of components (e.g., circuit boards, integrated circuits, metals, plastic, wiring, batteries, lamps, etc.) through manual disassembly, dismantling, or otherwise manually segregating components for the purposes of directly reusing those components onsite without further processing, or sending those components offsite for direct reuse or further reclamation at another location. [66273.33(d)(3)(B)]

C.	Recycling through the utilization of treatment processes other than manual disassembly for the purposes of directly reusing components onsite without further processing, sending components offsite for direct reuse, or sending components or treatment residuals offsite for further reclamation at another location, and whose recycling or treatment activities produces only hazardous residuals (including finely divided materials) that meet the definition of scrap metal in 66260.10, or which are otherwise exempt from full regulation as hazardous waste. [66273.33(d)(3)(C)]
D.	Recycling through the utilization of treatment processes other than manual disassembly for the purposes of directly reusing components onsite without further processing, sending components offsite for direct reuse, or sending components or treatment residuals offsite for further reclamation at another location, and whose recycling or treatment processes produce any residuals (including bag house and filter dusts) which exhibit any hazardous waste characteristic defined in chapter 11 and do not meet the definition of scrap metal in section 66260.10 (e.g., because they are fine powders or are contaminated with fine powders), or do not qualify for management as universal waste under this chapter. [66273.33(d)(3)(D)]
Treatment or Recycler Standards for LQHs, [that reclaim per (B), (C), or (D) above]	
<input type="checkbox"/>	Failed to notify DTSC no later than 30 days prior to treating or recycling any universal waste electronic devices after August 6, 2004. [66273.33(d)(3)(F)(1)(a)]
<input type="checkbox"/>	Failed to notify DTSC prior to July 7, 2004, if LQH currently treats or recycles UW electronic devices. [66273.33(d)(3)(F)(1)(a)]
<input type="checkbox"/>	Failed to submit a written notification by certified mail, return receipt. [66273.33(d)(3)(F)(1)(a)]
<input type="checkbox"/>	Submitted an incomplete notification. [66273.33(d)(3)(F)(1)(a)]
<input type="checkbox"/>	Failed to prepare and submit an annual report to DTSC. [66273.33(d)(3)(F)(1)(b)]
<input type="checkbox"/>	Failed to submit the annual report by certified mail, return receipt to DTSC by February 1 of each calendar year covering the previous calendar year. [66273.33(d)(3)(F)(1)(b)]
<input type="checkbox"/>	Failed to date and sign the annual report according to the requirements of section 66270.11. [66273.33(d)(3)(F)(1)(b)]
<input type="checkbox"/>	Failed to submit a complete annual report. [66273.33(d)(3)(F)(1)(b)]

Containment of Residuals [per (C), or (D) above]	
<input type="checkbox"/>	Failed to manage all materials produced from the treatment of UW electronic devices in a manner that prevents a release. [66273.33(d)(3)(F)(2)]
<input type="checkbox"/>	Failed to conduct treatment activities over, or in a containment device of sufficient in size and construction. [66273.33(d)(3)(F)(2)(a)]
<input type="checkbox"/>	Failed to contain any residuals in a manner that minimizes breakage and prevents leakage, spillage or damage. [66273.33(d)(3)(F)(2)(b)]
<input type="checkbox"/>	Failed to immediately clean up and place in a container any UW electronic device that is broken and may reasonably be expected to cause a release. [66273.33(d)(3)(F)(2)(c)]
Worker Safety [per (B), (C), or (D) above]	
<input type="checkbox"/>	Failed to be familiar with the hazards associated with UW electronic device treatment activities. [66273.33(d)(3)(F)(3)(a)]
<input type="checkbox"/>	Failed to have access to the proper procedures and protective equipment necessary to safely conduct UW electronic device treatment activities and to comply with the requirements of this section. [66273.33(d)(3)(F)(3)(a)]
<input type="checkbox"/>	Failed to ensure that the facility is operated in compliance with all applicable worker health and safety laws and regulations (i.e., California Code of Regulations, title 8). [66273.33(d)(3)(F)(2)(b)]
Zoning [per (B), (C), or (D) above]	
<input type="checkbox"/>	Failed to ensure that the treatment activities conducted at the facility are consistent with local zoning and land use requirements for that location. [66273.33(d)(3)(F)(4)]
Management of Residuals [per (B), (C), or (D) above]	
<input type="checkbox"/>	Failed to ensure that all materials produced as a result of the treatment processes are properly classified and managed in accordance with any applicable requirements of this division. [66273.33(d)(3)(F)(5)]
Management Standards [per (C), or (D) above]	
<input type="checkbox"/>	Failed to use only treatment methods that employ one or more of the following technologies: [66273.33(d)(3)(F)(6)(a)] Physical processes that change only the physical properties of the waste such as cutting, sawing, breaking, shredding, crushing, grinding, screening, sieving, acceleration, or compacting; [66273.33(d)(3)(F)(6)(a)(1)] AND/OR Separation based on differences in physical properties such as size, color, density, or ferromagnetism. [66273.33(d)(3)(F)(6)(a)(2)]

<input type="checkbox"/>	Failed to ensure all mercury containing lamps and other components which contain fluids (i.e., liquids or gasses) that would be identified as hazardous waste were removed prior to processing. [66273.33(d)(3)(F)(6)(a)(3)]
<input type="checkbox"/>	Allowed processing of universal waste electronic devices containing PCB ballasts, medical or bio-hazardous wastes, radioactive materials, reactive materials, or ignitable materials. [66273.33(d)(3)(F)(6)(a)(4)]
<input type="checkbox"/>	Failed to ensure the treatment is conducted without the use or application of: [66273.33(d)(3)(F)(6)(b)] Chemicals, including water; [66273.33(d)(3)(F)(6)(b)(1)] External heat. [66273.13(d)(3)(F)(6)(b)(2)]
<input type="checkbox"/>	Failed to ensure that all hazardous wastes generated from treatment activities that are sent offsite for disposal are manifested. [66273.33(d)(3)(F)(6)(c)]
<input type="checkbox"/>	Failed to ensure that all treatment residuals meeting the definition of scrap metal in section 66260.10 are recycled. [66273.33(d)(3)(F)(6)(d)]
<input type="checkbox"/>	Accept for treatment, any universal waste electronic devices that are managed, or are required to be managed, as hazardous waste under chapters 10 through 22 of this division unless authorized to do so under hazardous waste management permit or other grant of authorization. [66273.33(d)(3)(F)(6)(e)]
<input type="checkbox"/>	Failed to comply with the requirements of sections 66265.18 and 66265.25 of chapter 15 as those requirements apply to facility location and design standards. [66273.33(d)(3)(F)(6)(f)]
<input type="checkbox"/>	Failed to ensure that all treatment is conducted in compliance with all applicable local and state air pollution control laws and regulations. [66273.33(d)(3)(F)(6)(g)]
<input type="checkbox"/>	Failed to conduct treatment only for the purposes of recycling one or more types of universal waste electronic devices. [66273.33(d)(3)(F)(6)(h)]
<input type="checkbox"/>	Failed to maintain on file copies of the most recent notifications and reports submitted to DTSC and a copy of any local air district permit and other permits required for the facility no later than 30 days prior to recycling or treating any UW waste electronic devices. [66273.33(d)(3)(F)(6)(i)]
<input type="checkbox"/>	Failed to make documents available to any representative of DTSC, the U. S. EPA, or a local governmental agency. [66273.33(d)(3)(F)(6)(i)]

<input type="checkbox"/>	Failed to deliver documents by person or by certified mail, return receipt requested, to DTSC when requested in writing. [66273.33(d)(3)(F)(6)(i)]
<input type="checkbox"/>	Failed to submit a written notification to DTSC no later than 30 days after ceasing treatment or recycling activities at the facility. [66273.33(d)(3)(F)(6)(j)]
<input type="checkbox"/>	Failed to submit a written notification to DTSC by certified mail, return receipt. [66273.33(d)(3)(F)(6)(j)]
<input type="checkbox"/>	Submitted an incomplete notification. [66273.33(d)(3)(F)(6)(j)]
Treatment Standards [per (D) above]	
<input type="checkbox"/>	Failed to prepare and submit to DTSC a written estimate of a cost for closure no later than 30 days prior to initially recycling or treating any universal waste electronic devices. [66273.33(d)(3)(F)(7)]
<input type="checkbox"/>	Failed to submit a written estimate of the facility closure cost by certified mail, return receipt. [66273.33(d)(3)(F)(7)(a)]
<input type="checkbox"/>	Submitted an incomplete closure cost estimate pursuant to the requirements specified in section 66265.142. [66273.33(d)(3)(F)(7)(a)]
<input type="checkbox"/>	Failed to evaluate, and adjust if necessary, the closure cost estimate annually to reflect changes in closing cost. [66273.33(d)(3)(F)(7)(a)]
<input type="checkbox"/>	Failed to submit to DTSC written documentation demonstrating financial assurance for closure no later than 30 days prior to initially recycling or treating any universal waste electronic devices [66273.33(d)(3)(F)(7)(b)]
<input type="checkbox"/>	Failed to submit written documentation demonstrating financial assurance for closure by certified mail, return receipt. [66273.33(d)(3)(F)(7)(b)]
<input type="checkbox"/>	Submitted incomplete documentation demonstrating financial assurance for closure pursuant to section 66265.143. [66273.33(d)(3)(F)(7)(b)]
<input type="checkbox"/>	Failed to submit to DTSC documentation demonstrating financial responsibility for liability no later than 30 days prior to initially recycling or treating any universal waste electronic devices [66273.33(d)(3)(F)(7)(c)]
<input type="checkbox"/>	Failed to submit documentation demonstrating financial responsibility for liability by certified mail, return receipt. [66273.33(d)(3)(F)(7)(c)]

<input type="checkbox"/>	Submitted complete documentation demonstrating financial responsibility for liability pursuant to section 66265.147. [66273.33(d)(3)(F)(7)(c)]
LABELING/MARKING	
<input type="checkbox"/>	Failed to properly label or clearly mark each container or pallet in or on which UW electronic devices are contained, including containers or pallets that also contain devices with one of the following phrases: "Universal Waste—Consumer Electronic Device(s)" or "UW—Consumer Electronic Device(s)." [66273.34(d)]
AND	
<input type="checkbox"/>	Failed to accumulate universal waste electronic devices within a designated area demarcated by boundaries that are clearly labeled. [66273.34(d)(1)]
ACCUMULATION TIME LIMITS	
<input type="checkbox"/>	Accumulated universal waste for longer than one year from the date the universal waste is generated, or received from another handler, unless the requirements of subsection (b) of these sections are met. [66273.35]
<input type="checkbox"/>	Failed to mark or label the length of time that the universal waste has been accumulated from the date it becomes a waste or is received. [66273.35(c)]
OR	
<input type="checkbox"/>	Failed to maintain an inventory system on-site that identifies the date each universal waste became a waste or was received. [66273.35(c)(1)&(2)]
OR	
<input type="checkbox"/>	Failed to maintain an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers of universal waste became a waste or was received. [66273.35(c)(3)&(4)]
OR	
<input type="checkbox"/>	Failed to place UW in a specific accumulation area and identifying the earliest date that any universal waste in the area became a waste or was received. [66273.35(c)(5)]
EMPLOYEE TRAINING	
<input checked="" type="checkbox"/>	Failed to provide training to ensure that all employees who handle or have responsibility for managing universal waste are thoroughly familiar with proper waste handling and emergency procedures, relative to their responsibilities during normal facility operations and emergencies. [66273.36]

RESPONSE TO RELEASES	
<input type="checkbox"/>	Failed to immediately contain all releases of universal wastes and other residues from universal wastes. [66273.37(a)]
<input type="checkbox"/>	Failed to determine whether any material resulting from the release is hazardous waste, and if so, manage the hazardous waste in compliance with all applicable requirements of this division. [66273.37(b)]
	Failed to properly repackage waste consisting only of residues of leaking, broken, or otherwise damaged universal waste. [66273.37(c)]
OFF-SITE SHIPMENTS	
<input type="checkbox"/>	Sent or delivered UW to a place other than another UW handler, a destination facility, or a foreign destination. [66273.18(a)]
<input type="checkbox"/>	Failed to comply with transporter requirements while self-transporting the universal waste. [66273.38(b)]
<input type="checkbox"/>	Failed to package, label, mark and placard the shipment, and prepare the proper shipping papers for UW offered for off-site transportation that meets the definition of hazardous materials under 49 CFR parts 171 through 180. [66273.38(c)]
<input type="checkbox"/>	Failure to ensure that the receiving handler agrees to receive the shipment from the originating handler prior to sending a shipment. [66273.38(d)]
<input type="checkbox"/>	Failure to either receive the UW back, or agree with the receiving handler on a destination facility to which the shipment will be sent, if the UW is rejected by the receiving handler or destination facility. [66273.38(e)(1)&(2)]
<input type="checkbox"/>	Failed to notify the originating handler to discuss reshipment, if the receiving handler rejects a shipment containing UW, or a portion of a shipment containing UW. [66273.38(f)(1)&(2)]
<input type="checkbox"/>	Failed to immediately notify DTSC of the illegal shipment, and provide the name, address, and phone number of the originating shipper if the facility receives a shipment containing hazardous waste that is not a universal waste. [66273.38(g)]
TRACKING UW SHIPMENTS	
<input type="checkbox"/>	Failed to keep a record of each shipment of universal waste <u>received</u> at the facility. [66273.39(a)]
<i>Failed to record any of the following information:</i>	
<input type="checkbox"/>	The name and address of the originating universal waste handler or foreign shipper from whom the universal waste was sent; [66273.39(a)(1)]

<input type="checkbox"/>	The quantity of each type of universal waste received (e.g., batteries, thermostats, lamps, mercury switches, etc.); [66273.39(a)(2)]
<input type="checkbox"/>	The date of receipt of the shipment of universal waste. [66273.39(a)(3)]
<input type="checkbox"/>	Failed to keep a record of each shipment of universal waste <u>sent</u> from the handler to off-site facilities. [66273.39(b)]
<i>Failed to record any of the following information:</i>	
<input type="checkbox"/>	The name and address of the universal waste handler, destination facility, or foreign destination to whom the universal waste was sent; [66273.39(b)(1)]
<input type="checkbox"/>	The quantity of each type of universal waste sent (e.g., batteries, thermostats, lamps, mercury switches, etc.); [66273.39(b)(2)]
<input type="checkbox"/>	The date the shipment of universal waste left the facility. [66273.39(b)(3)]
<input type="checkbox"/>	Failed to retain the records described in subsection (a) of this section for at least three years from the date of receipt of a shipment of universal waste; [66273.39(c)(1)]
<input type="checkbox"/>	Failed to retain the records described in subsection (b) of this section for at least three years from the date a shipment of universal waste left the facility. [66273.39(c)(2)]
EXPORT	
<input type="checkbox"/>	Failed to comply with the requirements applicable to a primary exporter in section 66262.53, 66262.56(a) (1) through (4), (6), and (b) and 66262.57; [66273.40(a)] [Note: Export to OECD countries specified in section 66262.58(a)(1) are subject to the requirements of article 8 of chapter 12]
AND	
<input type="checkbox"/>	Failed to obtain the consent of the receiving country and in conformance with the EPA Acknowledgement of Consent as defined in article 5 of chapter 12; and [66273.40(b)]
AND	
<input type="checkbox"/>	Failed to provide a copy of the EPA Acknowledgment of Consent for the shipment to the transporter transporting the shipment for export. [66273.40(c)]
<input type="checkbox"/>	Failed to notify DTSC and concurrently send a copy of that notification to the CUPA of an intended export before such consumer electronic device is scheduled to leave the United States. A completed notification shall be submitted four weeks before the initial shipment is intended to be shipped offsite. This notification shall cover export activities extending over a twelve (12) month or lesser period. [66273.40(d)]

Failed to include all of the following information: [66273.40(e)]	
<input type="checkbox"/>	Name, mailing address, and telephone number of the universal waste handler; [66273.40(e)(1)]
<input type="checkbox"/>	The foreign destination, for each type of consumer electronic device; [66273.40(e)(2)]
<input type="checkbox"/>	The amount of consumer electronic devices (by count or by weight); [66273.40(e)(2)(A)]
<input type="checkbox"/>	The estimated frequency or rate at which the consumer electronic device is to be exported and the period of time over which the consumer electronic device is to be exported; [66273.40(e)(2)(B)]
<input type="checkbox"/>	All points of entry to and departure from each foreign country through which the consumer electronic device will pass; [66273.40(e)(2)(C)]
<input type="checkbox"/>	A description of the means by which each shipment of consumer electronic devices will be recycled at the foreign destination; and [66273.40(e)(2)(D)]
<input type="checkbox"/>	The name and site address of the consignee or any alternate consignee. [66273.40(e)(2)(E)]
<input type="checkbox"/>	Failed to send the notifications submitted under subsection (d) of this section to DTSC, Hazardous Waste Management Program, State Regulatory Programs Division, P.O. Box 806, Sacramento, CA 95812-0806, with "Attention: Notification to Export Consumer Electronic Devices" prominently displayed on the front of the envelope. [66273.40(f)]

COMMENTS:

NOTE: The inspector shall also note in this section a description of all violations that were observed and corrected during the inspection.

See Summary of Violations
 Note: Inspected new facility but not observed treatment activity.
 DTSC will re-inspect once treatment activity starts for level D. Facility needs to submit FA, CCE to the Dept.

Cathode Ray Tube (CRT) Material Handler (MH) Inspection Report

Facility Name: ARC International Corporation
 Identification Number: CA L000273749 / CAR000145714
 Facility Address: 333 Turnbull Canyon Road
City of Industry, CA 91744
 Date Inspected: January 23, 2007
 Inspected By: Ellen Pates + Jessica Rodriguez
 Type of Inspection: Annual Re-inspection Complaint
 Consent given by: RAY REHEBY PITCHER Time: 11:10 AM

DISCLAIMER

This checklist is intended to provide guidance only. This checklist does not replace or supersede relevant statutes and regulations. The information contained in this checklist is based upon the statutes and regulations in effect as of the date the checklist was signed. Interested parties are advised to keep apprised of subsequent changes to relevant statutes and regulations.

Citations that start with the number "66" are to the California Code of Regulations (CCR), title 22, division 4.5. Citations that start with the number "42" are to the Public Resources Code, division 30, part 3, chapter 8.5.

If the CRT Recycler is a permitted Hazardous Waste (HW) Facility, the Inspector shall contact DTSC staff responsible for maintaining that facility's permit to determine if additional requirements apply to CRT activities carried out at the facility.

REGULATED WASTES

CRTs (AKA covered electronic devices) are defined as a cathode ray tube, cathode ray tube device, flat panel screen, or any other similar video display device with a screen size that is greater than four inches in size measured diagonally and which the DTSC determines, when discarded or disposed, would be a hazardous waste pursuant to Chapter 6.5 (commencing with Section 25100) of Division 20 of the Health and Safety Code. [42463(f)(1)]

Check box if violation: (if checked see attached SOV)

PROHIBITIONS	
<input type="checkbox"/>	Disposed of a CRT material. [66273.81(a)]
<input type="checkbox"/>	Diluted or treated a CRT material unless requirements of this section are met. [66273.81(b)]
NOTIFICATION & ANNUAL REPORT	
<input type="checkbox"/>	Failed to notify DTSC at least 30 days prior to accepting any CRT materials from an offsite source. [66273.82(a)]
<input type="checkbox"/>	Failed to submit an annual report to DTSC, if CRT MH accepted >5 CRTs, >5 CRT devices, or >100 kg of CRT glass per calendar year from any offsite source. [66273.82(b)(2)]
<input type="checkbox"/>	Failed to submit annual report to DTSC, if CRT MH generates ≥5,000 kg of CRT material per calendar year. [66273.82(b)(3)]
<input type="checkbox"/>	Failed to submit written annual report to DTSC by February 1 of each calendar year. [66273.82(b)]
<input type="checkbox"/>	Submitted an incomplete notification or annual report. [66273.82(a) & (b)(4)]
<input type="checkbox"/>	A CRT MH who performs data conversions derived from mass data failed to include the conversion factor(s) in the annual report. [66273.82(c)]
<input type="checkbox"/>	Failed to submit a written notification or annual report by certified mail, return receipt. [66273.82(d)]

WASTE MANAGEMENT	
<input type="checkbox"/>	Failed to contain any CRT materials in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the container. [66273.83(a)(1)]
<input type="checkbox"/>	Failed to immediately clean up and place in a container any CRT material that is broken or shows evidence of breakage, leakage, or damage. [66273.83(a)(2)]
<input type="checkbox"/>	Failed to safely remove CRTs from CRT devices. [66273.83(b)(1)]
<input type="checkbox"/>	Failed to determine whether any of the remaining portions of the CRT device or any other waste generated during the removal process exhibits any characteristic of a HW. [66273.83(b)(2)]
YOKE REMOVAL	
<input type="checkbox"/>	Failed to remove yoke without breaking CRT glass and MH does not meet treatment/recycling standards. [66273.83(c)(1)]
<input type="checkbox"/>	Failed to submit complete notification by certified mail regarding yoke removal. [66273.83(c)(2)]
<input type="checkbox"/>	Failed to maintain notification, air permit and other permits (as required), and produce these documents when requested. [66273.83(c)(3)]

<input type="checkbox"/>	Failed to submit the annual report to DTSC by February 1 of each calendar year and by certified mail. [66273.83(c)(4)]
<input type="checkbox"/>	Accepted CRTs or CRT devices that are managed, or are required to be managed as hazardous waste. [66273.83(c)(5)]
<input type="checkbox"/>	Failed to conduct treatment for the purpose of recycling the CRTs or CRT devices. [66273.83(c)(6)]
<input type="checkbox"/>	Failed to ensure all treatment is conducted over or in a containment device sufficient in size and construction to contain any CRT glass that may be released during yoke removal. [66273.83(c)(7)]
<input type="checkbox"/>	Failed to utilize only mechanical methods to remove the yoke. [66273.83(c)(8)]
<input type="checkbox"/>	Used heat, chemicals, or water in yoke removal process. [66273.83(c)(9)]
<input type="checkbox"/>	Failed to ensure that all persons that perform treatment are thoroughly familiar with hazards and have access to proper procedures and protective equipment necessary to safely conduct treatment and to comply with applicable requirements. [66273.83(c)(10)]
<input type="checkbox"/>	Failed to ensure that the facility is operated in compliance with all applicable local and state air pollution control laws and regulations. [66273.83(c)(11)]
<input type="checkbox"/>	Failed to ensure that the facility is operated in compliance with all applicable worker health and safety laws and regulations. [66273.83(c)(12)]
<input type="checkbox"/>	Failed to ensure that all materials generated as a result of the treatment processes are classified and managed properly. [66273.83(c)(13)]
<input type="checkbox"/>	Failed to ensure that the activities conducted at the facility are consistent with local zoning or land use requirements. [66273.83(c)(14)]
<input type="checkbox"/>	Failed to maintain compliance with location, seismic, and precipitation design standards requirements. [66273.83(c)(15)]
	CRT TREATMENT OR RECYCLING
<input type="checkbox"/>	Failed to notify DTSC no later than 30 days prior to treating or recycling the CRT material. [66273.83(d)(1)(A)(1)]
<input type="checkbox"/>	Failed to notify DTSC no later than 30 days prior to ceasing treatment or recycling activities. [66273.83(d)(1)(A)3]
<input type="checkbox"/>	Failed to notify the DTSC no later than 30 days after ceasing treatment or recycling activities. [66273.83(d)(1)(A)3]
<input type="checkbox"/>	Failed to complete notification and sign, and date notification as specified in title 22 CCR 66270.11. [66273.83(d)(1)(A)2, 4, 5 and 66273.83(d)(1)(B)]

<input type="checkbox"/>	Failed to submit to DTSC by certified mail a cost estimate for closure no later than 30 days prior to recycling or treating CRT materials. [66273.83(d)(2)]
<input type="checkbox"/>	Failed to submit to DTSC documentation demonstrating financial assurance for closure no later than 30 days prior to recycling or treating. [66273.83(d)(3)]
<input type="checkbox"/>	Failed to submit to DTSC documentation demonstrating financial responsibility for liability no later than 30 days prior to recycling or treating. [66273.83(d)(4)]
<input type="checkbox"/>	Failed to maintain on file the most recent notification and air permit (if required) and produce these records when requested. [66273.83(d)(5)]
<input type="checkbox"/>	Failed to prepare and submit an annual report to DTSC by February 1 of each calendar year. [66273.83(d)(6)]
<input type="checkbox"/>	Submitted an incomplete annual report. [66273.83(d)(6)]
<input type="checkbox"/>	Accepted any CRT material that is managed, or is required to be managed, as HW. [66273.83(d)(7)]
<input type="checkbox"/>	Conducted the treatment for the purpose of recycling one or more types of CRT glass and failed to reclaim the CRT glass at a CRT glass manufacturer or at a primary or secondary lead smelter. [66273.83(d)(8)]
<input type="checkbox"/>	Failed to ensure all treatment is conducted over or in a containment device sufficient in size and construction to contain any CRT glass that may be released. [66273.83(d)(9)]
<input type="checkbox"/>	Failed to utilize specified treatment methods. [66273.83(d)(10)]
<input type="checkbox"/>	Conducted treatment using chemicals or external heat other than specified in regulation. [66273.83(d)(11)]
<input type="checkbox"/>	Failed to ensure that the facility is operated in compliance with all applicable local and state air pollution control laws and regulations. [66273.83(d)(13)]
<input type="checkbox"/>	Failed to ensure that the facility is operated in compliance with all applicable worker health and safety laws and regulations. [66273.83(d)(14)]
<input type="checkbox"/>	Failed to ensure that all materials generated as a result of the treatment processes are properly classified and managed. [66273.83(d)(15)]
<input type="checkbox"/>	Failed to ensure that the activities conducted at the facility are consistent with local zoning or land use requirements. [66273.83(d)(16)]
<input type="checkbox"/>	Failed to maintain compliance with location standards and seismic and precipitation design standards requirements. [66273.83(d)(17)]

LABELING/MARKING	
<input checked="" type="checkbox"/>	Failed to properly label or clearly mark each container or pallet in or on which CRTs, CRT devices or CRT glass are contained. [66273.84]
<input type="checkbox"/>	Failed to properly label a designated area where CRTs and CRT devices are accumulated within demarcated boundaries. [66273.84)(d)]
<input type="checkbox"/>	Stored CRTs and CRT devices along with other materials in designated CRT accumulation areas. [66273.84)(d)]
ACCUMULATION TIME LIMITS	
<input type="checkbox"/>	Accumulated CRT material for more than one year from the date the universal waste (UW) is generated, or received from another handler. [66273.85(a)]
<input type="checkbox"/>	Failed to demonstrate the length of time that the UW has been accumulated from the date it became a waste or was received. [66273.85(b)]
EMPLOYEE TRAINING	
<input type="checkbox"/>	Failed to ensure that persons removing CRTs are thoroughly familiar with the techniques and safety precautions required to safely remove CRTs. [66273.83(b)(1)(C)]
<input type="checkbox"/>	Failed to ensure that all persons that perform treatment or recycling are thoroughly familiar with the associated hazards and have access to the proper procedures and protective equipment necessary to safely conduct the treatment. [66273.83(d)(12)]
<input checked="" type="checkbox"/>	Failed to inform all employees who handle or have responsibility for managing CRT material of the proper handling and emergency procedures. [66273.86(a)]
<input type="checkbox"/>	Employees who manage or handle waste CRT materials failed to receive specified initial training. [66273.86(b)]
<input type="checkbox"/>	Employees failed to take part in annual review of the initial training. [66273.86(c)]
RESPONSE TO RELEASES	
<input type="checkbox"/>	Failed to immediately contain all releases of CRT material and residues from CRT material. [66273.87(a)]
<input type="checkbox"/>	Failed to determine whether any material resulting from a release is a HW. [66273.87(b)]
<input type="checkbox"/>	Failed to manage any material determined to be HW as HW. [66273.87(b)]
<input type="checkbox"/>	Managed residues of leaking, broken, or damaged CRT material as UW without repackaging according to applicable standards. [66273.87(c)]

OFF-SITE SHIPMENTS	
<input type="checkbox"/>	Sent or took CRT material to a place other than another CRT MH, a destination facility, or a foreign destination. [66273.88(a)]
<input type="checkbox"/>	A CRT MH that transports CRT material off-site failed to comply with the UW transporter requirements. [66273.88(b)]
<input type="checkbox"/>	A CRT MH that offers CRT material that meets the definition of a hazardous material for off-site transportation failed to package, label, mark and placard the shipment according to applicable United States Department of Transportation (U.S DOT) regulations. [66273.88(c)]
<input type="checkbox"/>	The originating CRT MH failed to obtain an agreement from the receiving CRT MH prior to sending a shipment of CRT material. [66273.88(d)]
<input type="checkbox"/>	The originating CRT MH failed to follow rejected load procedures. [66273.88(e)]
<input type="checkbox"/>	The receiving CRT MH that rejects a shipment of CRT material failed to follow rejected load procedures. [66273.88(f)]
<input type="checkbox"/>	A CRT MH that receives a shipment of CRT material containing HW failed to notify DTSC of the shipment. [66273.88(g)]
<input type="checkbox"/>	A CRT MH that receives a shipment of non-hazardous, non-UW, failed to manage the waste in compliance with applicable federal, state, and local solid waste regulations. [66273.88(h)]
EXPORT	
<input type="checkbox"/>	Failed to notify DTSC four weeks before the intended initial shipment of CRT material to any foreign destination. [66273.90(a)]
<input type="checkbox"/>	Failed to notify CUPA of the intended export. [66273.90(a)]
<input type="checkbox"/>	Submitted an incomplete notification. [66273.90(b)]
<input type="checkbox"/>	Failed to notify the DTSC at least 60 days prior to export, the destination, contents, and volume of covered electronic waste (e-waste) to be exported to any foreign destination. [42476.5(a)]
<input type="checkbox"/>	Failed to demonstrate that the importation of covered e-waste is not prohibited by any applicable law or regulation of the country of destination and that any import is conducted in accordance with all applicable laws. [42476.5(b)]
<input type="checkbox"/>	Failed to forward required import and operating licenses to the DTSC. [42476.5(b)]

<input type="checkbox"/>	Failed to demonstrate that exportation of covered e-waste is conducted only in accordance with applicable international law. [42476.5(c)]
<input type="checkbox"/>	Failed to demonstrate that the management of the exported covered e-waste will be handled within the country of destination in accordance with applicable rules, standards, and requirements adopted by the Organization for Economic Cooperation and Development (OECD) for the environmentally sound management of e-waste. [42476.5(d)]
<input type="checkbox"/>	Failed to demonstrate that the covered e-waste is being exported for the purpose of reuse or recycling. [42476.5(e)]
RECORDKEEPING	
<input type="checkbox"/>	Failed to maintain a copy of any local air district permits and other permits required for the facility no later than 30 days prior to recycling or treating any CRT material. [66273.83(d)(5)(B)]
<input type="checkbox"/>	Failed to maintain records of employee training received for at least three years from the date the employee last worked at the facility. [66273.86(d)]
<input type="checkbox"/>	Incomplete shipment record of CRT material received. [66273.89(a)]
<input type="checkbox"/>	Incomplete shipment record of CRT material sent. [66273.89(b)]

COMMENTS:

NOTE: The inspector shall also note in this section a description of all violations that were observed and corrected during the inspection.

See Summary of Violations

Note: Inspected new facility but not observed treatment activity.

DTSC will re-inspect once treatment activity starts for level D.

Facility needs to submit FA, CEE.

HAZARD APPRAISAL AND RECOGNITION PLAN PRESITE VISIT FORM

SECTION A. FIELD TEAM

Prepared by: Ellen Pates
 Date: 1/18/2007
 Phone: (818) 551-2987

	Name	Unit/Agency	Responsibility (Lead Field Staff)
1	Jessica Rodriguez	SCD	Back-up
2	Ellen Pates	SCD	Lead
3			
4			
5			
6			

SECTION B. SITE DESCRIPTION

Site Name: ARC INTERNATIONAL
 PCA No: 22322 Project #: 550211 WP: 48
 Address: 333 Tumbull Canyon Road
 City: City of Industry State: CA Zip: 91744
 Site Phone No.: (626) 606-0200

NOTE: Attach Map of Site and Directions to Hospital

Contact Person: Sunny Young
 Type of Operation/Waste Stream (Describe): E-waste SB 20 Recycling
 Purpose of Visit (Describe): SB 20 E-waste Inspection
 Site Visit Date (s): 1/22/07
 Estimated Time on Site: Hours/Day: 8 Days: 1
 Nearest Hospital and Address: 14282 Amar Road, La Puente CA
 Phone No.: (626) 917-4481

SECTION C. NUMBER OF SAMPLES TO BE COLLECTED

Air:	Surface Impoundment	
Drum (s)	Surface Water:	
Groundwater	Tank (s)	
Soil/Sediment:	Waste/Sludge	
Sump/Pit	Other	

SECTION D. POTENTIAL HAZARDS

1. Chemical Hazards	2. Physical Hazards
<input type="checkbox"/> Carcinogens	<input type="checkbox"/> Confined Space (Source _____)
<input type="checkbox"/> Corrosives	<input type="checkbox"/> Heat or Cold Stress (Expected (Temp _____ °F))
<input type="checkbox"/> Developmental Health Hazards (Teratogen)	<input type="checkbox"/> Machinery Construction
<input type="checkbox"/> Explosives	<input type="checkbox"/> Noise (Source/Decibels)
<input type="checkbox"/> Dusts	<input type="checkbox"/> Oxygen Deficiency
<input type="checkbox"/> Flammables	<input type="checkbox"/> Radioactive materials
<input type="checkbox"/> Inorganic Vapor Gases	<input type="checkbox"/> Biohazards
<input type="checkbox"/> Metals	<input checked="" type="checkbox"/> Other (Specify)
<input type="checkbox"/> Oxidizers	Universal Waste Electronic Devices
<input type="checkbox"/> PCBs	CRT'S
<input type="checkbox"/> Pesticides	
<input type="checkbox"/> Reproductive Health Hazards	
<input type="checkbox"/> Skin Absorption	
<input type="checkbox"/> Solvents	

(Use this space to describe hazards)
 Do not enter truck, open drums/lids/containers.
 Be aware of moving vehicles

SECTION E. BASIC INFORMATION ON POTENTIAL HAZARDS

(Attach copies of HARP Chemical Data Sheets or other appropriate information as suggested in instructions.)

SECTION F. EXPOSURE CONTROL METHODS

Engineering (E) Administrative (A) Work Practices (WP)

Describe: Walkthrough of the facility and Record Review Evaluation

SECTION G. REQUIRED PERSONAL PROTECTIVE EQUIPMENT

Level of Protection: B C D
Gloves (s) Outer = O, Inner = I
 Cotton/Vinyl Tyvek
 Silver Shield/4H P.E Tyvek
 Neoprene Saranex
 Nitrile PVC
 Grip/Glove/Kevlar (when needed) Tychem
 Viton

Respirator: A/P Cartridge: _____ SCBA Escape

Other Safety Gear:

Boot Covers Hearing Protection Plugs Muffs
 Boots Eye Protection Safety Vest
 Hard Hats Other

SECTION H. SURVEY EQUIPMENT

Combustible Gas/Oxygen Meter Radiation Meter
 Photoionization Detector Lamp: _____
 Organic Vapor Analyzer (OVA) Aerosol/Particle Monitor
 CMF Chip (Specify) _____ Noise Dosimeter
 PAC III WBGT Meter
 Other (Specify) N/A

*Personal Data KAM
 * 15 levels, each 0.05 mg/m³
 above background, leave
 to "clean" air*

SECTION I. OTHER HYGIENE AND SAFETY EQUIPMENT

Available	Bring	
On Site		
<input type="checkbox"/>	<input type="checkbox"/>	Canopy/Tarp/Umbrella
<input type="checkbox"/>	<input type="checkbox"/>	Drinking Water
<input type="checkbox"/>	<input type="checkbox"/>	Shower/Eye Wash
<input type="checkbox"/>	<input type="checkbox"/>	Fire Extinguisher
<input type="checkbox"/>	<input type="checkbox"/>	First Aid Kit
<input type="checkbox"/>	<input type="checkbox"/>	Plastic Sheetting/Buckets/Bags
<input type="checkbox"/>	<input type="checkbox"/>	Portable Toilets
<input type="checkbox"/>	<input type="checkbox"/>	Washing Facilities

SECTION J. PERSONAL MONITORING

Do You Need Industrial Hygiene Monitoring? Yes No

SECTION K. REVIEW/APPROVAL

[Signature] 1-19-07
 Industrial Hygienist (Review) Date
[Signature] 1-22-07
 Supervisor (Approval) Date

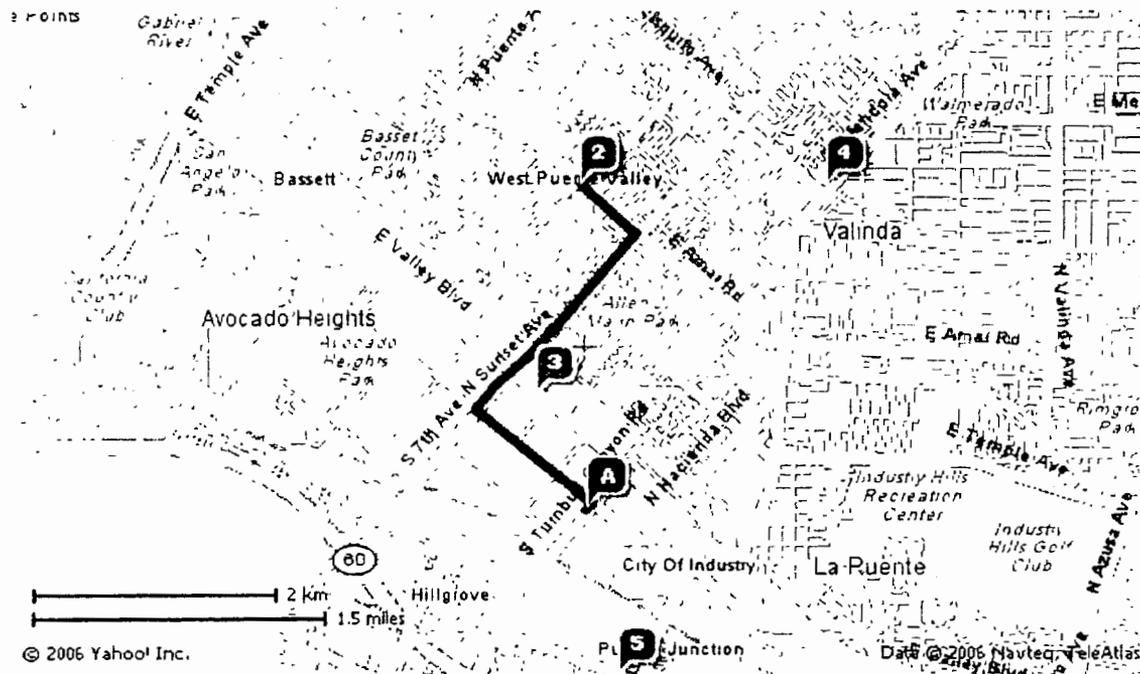
YAHOO! DRIVING DIRECTIONS

A Saint Gobain Calmar (626) 330-3162
 333 Turnbull Canyon Road, City of Industry, CA 91744

1. Start at **333 TURNBULL CANYON RD, CITY OF INDUSTRY** - go **0.0** mi
2. Turn **L** on **E PROCTOR AVE** - go **0.8** mi
3. Turn **R** on **S 7TH AVE** - go **0.3** mi
4. Continue on **N SUNSET AVE** - go **1.0** mi
5. Turn **L** on **E AMAR RD** - go **0.4** mi
6. Arrive at **14282 AMAR RD, LA PUENTE**, on the **L**

B Medical Clinic Urgent Care (626) 917-4481
 14282 Amar Rd, La Puente, CA

Total Distance: 2.5 miles, Total Travel Time: 5 mins



Your Points of Interest

- | | |
|---|---|
| <p>1. Vista Specialty Hospital San Gabriel Valley ★★★★★
 14148 Francisquito Ave, Baldwin Park, CA
 Phone: (626) 388-2700</p> <p>2. Medical Clinic Urgent Care
 14282 Amar Rd, La Puente, CA
 Phone: (626) 917-4481</p> <p>3. Southern California Animal Hospital</p> | <p>4. Homox Medical Equipment
 1643 N Hacienda Blvd, La Puente, CA
 Phone: (626) 918-3211</p> <p>5. St Francis Animal Hospital
 15708 Gale Ave, Hacienda Heights, CA
 Phone: (626) 968-4709</p> |
|---|---|

When using any driving directions or map, it's a good idea to do a reality check and make sure the road still exists, watch out for construction, and follow all traffic safety precautions. This is only to be used as an aid in planning.

State of California-California Environmental Protection Agency

Department of Toxic Substances Control

LIABILITY CERTIFICATE OF INSURANCE*If additional space is needed, add attachment.*

Insurer Name: Evanston Insurance Company	Address: 310 Highway 35 South Red Bank, NJ 07701	License Number: 35378 Issued by State of: IL
Insured Name: ARC International Corp. dba Coastal Corp.	Address: 680 S. Lemon Avenue, City of Industry, CA 91716	

Hazardous Waste Facilities/TTUs Covered: [Enter Information For Each Facility/TTU]

LIMITS OF LIABILITY

NAME OF FACILITY/TTU	ADDRESS OF FACILITY/TTU	HAZARDOUS WASTE FACILITY/TTU ID NUMBER	SUDDEN* OCCURRENCES EACH OCCURRENCE/ ANNUAL AGGREGATE AMOUNT	NONSUDDEN* OCCURRENCES EACH OCCURRENCE/ ANNUAL AGGREGATE AMOUNT
Silicon Valley Facility	2227 Commerce Pl Hayward CA 94545	CAL000298600	\$5mm \$5mm	/
Los Angeles Facility	333 Turnbull Canyon Rd, City of Industry, CA	CAR000180257	\$5mm \$5mm	/
			/	/
Policy Number 06PRG01617	Effective Date 11/09/06-07	Total \$5mm \$5mm	Total /	

* Excluding legal costs and deductibles

INSURER CERTIFICATION:

- This endorsement certifies that this policy has provided liability insurance covering bodily injury and property damage in connection with the insured's obligation to demonstrate financial responsibility under California Code of Regulations, Title 22, Division 4.5, Chapter 14 and 15, Article 8, Sections 66264.147 and 66265.147. The coverage applies to the above listed facilities/transportable treatment units [TTUs] in the amounts listed for sudden and/or nonsudden occurrences or both, and are exclusive of legal defense costs.

If the endorsement is for an excess insurance policy, complete the following sentence:
 "\$ _____ each occurrence and \$ _____ annual aggregate in excess of the underlying limits of \$ _____ each occurrence and \$ _____ annual aggregate."

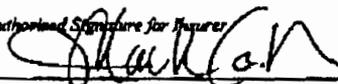
State of California-California Environmental Protection Agency

Department of Toxic Substances Control

2. The Insurer further certifies the following with respect to the insurance described above:

- (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.
- (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in California Code of Regulations, Title 22, Division 4.5, Chapter 14 and 15, Article 8, Section 66264.147 and 66265.147.
- (c) Whenever requested by the Department of Toxic Substances Control (DTSC), the Insurer agrees to furnish to DTSC a signed duplicate of the original policy and all endorsements.
- (d) Cancellation of the insurance, whether by the insurer or the insured, a parent corporation providing insurance coverage for its subsidiary, or by a firm having an insurable interest in and obtaining liability insurance on behalf of the owner or operator of hazardous waste management facility TTU, may occur only by sending notice of cancellation by either registered or certified mail to DTSC. Cancellation will not be effective until after the expiration of sixty [60] days after receipt of notice of cancellation as evidenced by the returned receipt.
- (e) Any other termination of the insurance may occur only by sending notice of cancellation by either registered or certified mail to DTSC. Cancellation will not be effective until after the expiration of thirty [30] days after receipt of cancellation as evidenced by the returned receipt.

The party below certifies that this document is being executed in accordance with the requirements of California Code of Regulations, Title 22, Division 4.5, Chapter 14 and 15, Article 8, Sections 66264.147 and 66265.147, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more states.

<i>Authorized Signature for Insurer</i> 	<i>Title</i> Vice President
<i>Typed or Printed Name of Person Signing</i> Mark G. Brown	<i>Date</i> 1/15/2007

Address of Person Signing For Insurer

310 Highway 35 South, Red Bank, NJ 07701

PRIVACY STATEMENT

This information is requested by the Department of Toxic Substances Control under the Health and Safety Code, Section 25343 in order to verify adequate financial assurance of hazardous waste facilities/transportable treatment units. Completion of this form is mandatory. The consequence of not completing the form is denial of a permit to operate a hazardous waste facility/TTU. Information may be provided to U.S. Environmental Protection Agency, State Attorney General, Air Resources Board, California Integrated Waste Management Board, Energy Resources Conservation and Development Commission, Water Resources Control Board and California Regional Water Quality Control Boards. For more information or access to your records, contact the Department of Toxic Substances Control, 2800 Cal Center Drive, Sacramento, California 95825, (916) 286-3545.

State of California - California Environmental Protection Agency

Department of Toxic Substances Control

LIABILITY ENDORSEMENT

If additional space is needed, add attachment.

Insurer Name: Evanston Insurance Company		Address: 310 Highway 35 South Red Bank, NJ 07701		License Number: 35378	
				Issued by State of: IL	
Insured Name: ARC International Corp. dba Coastal Corp.		Address 680 S. Lemon Avenue, City of Industry, CA 91716			
Hazardous Waste Facilities/TTUs Covered: [Enter Information for Each Facility/TTU] Limits of Liability					
NAME	ADDRESS	TO NUMBER HAZARDOUS WASTE FACILITY/TTU	SUDDEN* OCCURRENCES Each Occurrence/ Annual Aggregate Amount	NONSUDDEN* OCCURRENCES Each Occurrence/ Annual Aggregate Amount	
Silicon Valley Facility	2227 Commerce Pl Hayward, CA 94545	CAL000298600	\$5mm / \$5mm	/	
Los Angeles Facility	833 Turnbull Canyon Rd, City of Industry, CA	CAR000180257	\$5mm / \$5mm	/	
			/	/	
Policy Number: 06PRG01617		Effective Date: 11/09/2006-07	Total \$5mm / \$5mm	Total: /	

*Excluding legal costs and deductibles

INSURER CERTIFICATION:

1. This endorsement certifies that the policy to which the endorsement is attached provides liability insurance covering bodily injury and property damage in connection with the insured's obligation to demonstrate financial responsibility under California Code of Regulations, Title 22, Division 4.5, Chapter 14 and 15, Article 8, Sections 66264.147 and 66265.147. The coverage applies to the above listed facilities/transportable treatment units [TTUs] in the amounts listed for sudden and/or nonsudden occurrences or both, and are exclusive of legal defense costs.

If the endorsement is for an excess insurance policy, complete the following sentence: "\$ _____ each occurrence and \$ _____ annual aggregate in excess of the underlying limits of \$ _____ each occurrence and \$ _____ and \$ _____ annual aggregate."

2. The insurance afforded with respect to such occurrences is subject to all of the terms and conditions of the policy; provided, however, that any provisions of the policy inconsistent with subsections [a] through [e] of this paragraph 2 are hereby amended to conform with subsections [a] through [e]:
- [a] Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy to which this endorsement is attached.
- [b] The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in California Code of Regulations, Title 22, Division 4.5, Chapter 14 and 15, Article 8, Section 66254.147 and 66265.147.

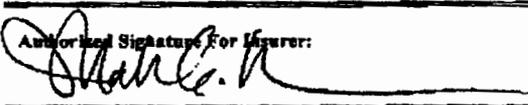
State of California - California Environmental Protection Agency

Department of Toxic Substances Control

- [c] Whenever requested by the Department of Toxic Substances Control [DTSC], the Insurer agrees to furnish to DTSC a signed duplicate original of the policy and all endorsements.
- [d] Cancellation of the endorsement, whether by the Insurer, the insured, a parent corporation providing insurance coverage for its subsidiary, or by a firm having an insurable interest in and obtaining liability insurance on behalf of the owner or operator of the facility(ies)/TTU(s), may occur only by sending notice of cancellation by either registered or certified mail to DTSC. Cancellation will not be effective until after the expiration of sixty [60] days after receipt of the notice of cancellation as evidenced by the returned receipt.
- [e] Any other termination of the endorsement may occur only by sending notice of cancellation by either registered or certified mail to DTSC. Cancellation will not be effective until after the expiration of thirty [30] days after receipt of cancellation as evidence by the returned receipt.

Attached to and forming part of policy No. [insert policy number] 062401617 issued by [insert name of insurer] Evanston Insurance Company herein called the Insurer, of [insert address of insurer] 310 Highway 35 South, Red Bank, NJ to [insert name of insured] MRC International Corp. of [insert address of insured] 690 S. Leomon Avenue, City of Industry, CA 91716 this [insert number of date] 15th day of [insert month] January, [insert year] 2007. The effective date of said policy is [insert number of date] 9th day of [insert month] November, [insert year] 2006.

The party below certifies that this document is being executed in accordance with the requirements of California Code of Regulations, Title 22, Division 4.5, Chapter 14 and 15, Article 8, Sections 66264.147 and 66265.147, and the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines Insurer, in one or more states.

Authorized Signature For Insurer: 	Title: Vice President
Typed or Printed Name of Person Signing: Mark G. Brown	Date: 1/15/2007
Address of Person Signing For Insurer: 310 Highway 35 South, Red Bank, NJ 07701	

PRIVACY STATEMENT

This information is requested by the Department of Toxic Substances Control, under Health and Safety Code, Section 25245 in order to verify adequate financial assurance of hazardous waste facilities/transportable treatment units. Completion of the form is mandatory. The consequence of not completing the form is denial of a permit to operate a hazardous waste facility/TTU. Information may be provided to U.S. Environmental Protection Agency, State Attorney General, Air Resources Board, California Integrated Waste Management Board, Energy Resources Conservation and Development Commission, Water Resources Control Board and California Regional Water Quality Control Boards. For more information or access to your records, contact the Department of Toxic Substances Control, 8800 Cal Center Drive, Sacramento, California 95826, (916) 255-3545.



Jerry Devon
Leasing Director

First Industrial Realty Trust, Inc.
114 Pacifica, Suite 220
Irvine, California 92618
T: (949) 486-1976
F: (949) 486-1971
C: (310) 343-3262
jdevon@firstindustrial.com
www.firstindustrial.com

Date: December 2008

Address: 333 Turnbull Canyon Rd.
City of Industry, CA 91744

Dear Sir or Madam,

As you are aware, ARC, located at 333 Turnbull Canyon Rd, City of Industry, California, operates a facility that accepts computers and other electronic devices. These devices are considered hazardous waste in California. As part of our operations, ARC will also recycle these devices by dismantling them and then sending the components to other recyclers for further reuse. Based on these activities, we are considered a handler/recycler of universal waste electronic devices.

By way of this letter, I am notifying you, the property owner, that we are conducting a hazardous waste treatment and recycling operation at the facility pursuant to Title 22, California Code of Regulations, Division 4.5, and Chapter 23 as required by these regulations.

Sincerely,

Bruce Jan
General Manager

12/2/08
Jerry Devon
First Industrial Realty Trust

ARC ARC International Corporation

December 20th 2006

Department of Toxic Substances Control
Hazardous Waste Management Program
Regulatory Program Development Division
PO Box 806
Sacramento, CA 98512-0806
Attention: UWED/CRT Materials Handling Activities

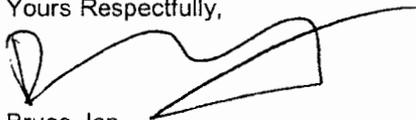
Subject: Updates to DTSC Form 1388

Dear Sir or Madam,

Please find attached the changes to ARC International Corporation's business information. ARC is planning to change our existing address at 911 S. Bixby to a new physical address at 333 Turnbull Canyon Rd. in the City of Industry. The Trust Agreement (Schedule A) has been updated with our new address and once the transition has been done, the location at 911 S. Bixby will be taken off. Please update the changes and keep on file as necessary.

Your prompt attention and assistance is greatly appreciated.

Yours Respectfully,



Bruce Jan
General Manager

ARC International Corporation – Headquarters
680 S. Lemon Ave.
Walnut, CA 91789
Main: 626-606-0200
Direct: 626-606-1002
Fax: 909-598-3819
Email: Bruce@arcic.com
www.arcic.com

Attachment: DTSC-1388

BJ/aw

**Notice of Intent to Handle and Treat or Recycle
Universal Waste Electronic Devices (UWEDs) and/or Cathode Ray Tube (CRT) Materials**

A. Handler Information [22 CCR sections 66273.13/.33(d)(2)(A)(1) - (7) and 66273.82(a)(1) - (7)]. Please fill in the information requested below.

Handler (Facility) Name ARC International Corporation Phone (626) 606-0200

Physical Address 333 Turnbull Canyon Rd. City of Industry LA CA 91744
Street City County State Zip

Mailing Address 680 S. Lemon Ave. Walnut LA CA 91789
Street City County State Zip

Contact Person (Name/Title) Sunny Young Phone (626) 606-1068

Mailing Address 680 S. Lemon Ave Walnut LA CA 91789
Street City County State Zip

Facility Owner Jay Hooper Phone (626) 606-1088

Mailing Address 680 S. Lemon Ave. Walnut LA CA 91789
Street City County State Zip

E-Mail address information@arcic.com (if available)

EPA ID Number CAL000293749 / CAR000145714 (if applicable)
000315696

B. Proposed Handling Activities [22 CCR sections 66273.13/.33(d)(2)(A)(8) - (9) and 66273.82(a)(8) - (9)]. Please check the box(es) that describes the source(s) of the materials you will collect. Please check the box(es) that describes the types of materials you will collect. Check all applicable boxes.

Materials Accepted From:

- Businesses
- Households
- Government agencies
- Other collectors
- Other *please specify* Schools

Materials to Be Handled

- (Check all that apply)
- CRT Materials
 - UWEDs
 - Universal Waste Batteries
 - Universal Waste Lamps
 - Exempt Circuit Boards
 - Other Scrap Metal

C. Please specify where you intend to send the materials you will receive from offsite sources. If you intend to export materials, please complete Section "D" below. Attach additional sheets if needed.

Destination Facility or Handler

1: Name SEE Attachment 1 Phone () _____

Address _____
Street City State Zip

Country _____ Phone () _____

Mailing Address _____
Street City State Zip

Country _____

EPA ID number _____ (if applicable)

Materials Shipped

- (Check all that apply)
- Bare CRTs
 - CRT Devices
 - CRT Glass
 - UWEDs
 - Universal Waste Batteries
 - Universal Waste Lamps
 - Exempt Circuit Boards
 - Other Scrap Metal

2: Name See Attachment Phone ()

Address _____
Street City State Zip

Country _____ Phone ()

Mailing Address _____
Street City State Zip

Country _____

EPA ID number _____ (if applicable)

- Bare CRTs
- CRT Devices
- CRT Glass
- UWEDs
- Universal Waste Batteries
- Universal Waste Lamps
- Exempt Circuit Boards
- Other Scrap Metal

3: Name _____ Phone ()

Address _____
Street City State Zip

Country _____ Phone ()

Mailing Address _____
Street City State Zip

Country _____

EPA ID number _____ (if applicable)

- Bare CRTs
- CRT Devices
- CRT Glass
- UWEDs
- Universal Waste Batteries
- Universal Waste Lamps
- Exempt Circuit Boards
- Other Scrap Metal

D. Exports. If you intend to export, please refer to the requirements found in 22 CCR sections 66273.20 (small quantity handler), 66273.40 (large quantity handler), and/or 66273.90 (CRT material handler). Please specify the name of the facility that will export material(s) you have received and the type of materials intended for export.

Facility That Will Export Material

1: Name ARC International Corp. Phone (626) 606-0200

Address 333 Turnbull Canyon Rd. City of Industry CA 91744
Street City State Zip

Country USA Phone (626) 606-0200

Mailing Address _____
Street City State Zip

EPA ID number CAL000273749 (if applicable)

Materials Exported

(Check all that apply)

- Bare CRTs
- CRT Devices
- CRT Glass
- UWEDs
- Universal Waste Batteries
- Universal Waste Lamps
- Exempt Circuit Boards
- Other Scrap Metal

2: Name P/S See Attachment Phone ()

Address _____
Street City State Zip

Country _____ Phone ()

Mailing Address _____
Street City State Zip

EPA ID number _____ (if applicable)

- Bare CRTs
- CRT Devices
- CRT Glass
- UWEDs
- Universal Waste Batteries
- Universal Waste Lamps
- Exempt Circuit Boards
- Other Scrap Metal

E. Cathode Ray Tube Material Treatment [22 CCR section 66273.83(c) or (d)]. Please fill in the information requested below. Attach additional sheets if necessary. Include photographs and diagrams if desired.

1. Describe the type of CRT materials you handle and intend to treat and/or recycle.

CRT Monitor and TV, CRT Terminals

2. Describe the treatment and/or recycling process(es) you will conduct.

Please See Attachment 3.

3. Check the box(es) that best describes your treatment/recycling activities.

- A. Removal of CRT from CRT device without breaking CRT glass. [Note: If this is the only treatment you perform, do not fill out this form. Please use Form 1382 instead.]
- B. CRT vacuum release without breaking CRT glass.
- C. Yoke removal without breaking CRT glass.
- D. Process CRTs (CRT glass breakage—without the use of heat, chemicals or water). [You must check one or more below.]
 - Remove necks/electron guns
 - Separate panel from funnel
 - Size reduction, crushing, cutting, sawing, compacting, shredding
 - Other (e.g. manufacture of glass) please specify _____

E. All of the following documents must be submitted with this form if you have checked "D" above.

- I have attached documentation estimating the cost of facility closure prepared pursuant to title 22, California Code of Regulations, section 66265.142.
- I have attached documentation demonstrating financial assurance for closure pursuant to title 22, California Code of Regulations, section 66265.143.
- I have attached documentation demonstrating financial responsibility for liability pursuant to title 22, California Code of Regulations, section 66265.147.

F. Universal Waste Electronic Device Treatment [22 CCR section 66273.13/.33(d)(3)(F)(1)(a)(4)]. Please fill in the information requested below. Attach additional sheets if necessary. Include photographs and diagrams if desired.

1. Describe the types of UWEDs you handle and intend to treat and/or recycle.

Printer, Scanner, CPU, Keyboard, Mice, Telephone, Radio, DVD/VCR
Players, Calculator, other UWEDs

2. Describe the treatment and/or recycling process(es) you will conduct.

Please See Attachment 4.

3. Check the box(es) that best describes your treatment/recycling activities.

- A. Removes discrete components typically removed during the normal operation of the UWED (batteries, ink cartridge, etc.) and the handler conducts the disassembly in a manner prescribed in the operating manual for the device. [Note: If this is the only treatment you perform, do not fill out this form. Please use Form 1382 instead.]
- B. Dismantling UWEDS into only their respective components using:
 Manual methods and hand tools or mechanical separation of parts only.
 Other *please specify* _____
 Treatment residuals are components of the electronic device (e.g., circuit boards, integrated circuits, metals, plastic, wiring, universal waste batteries and lamps, etc.)
- C. Processing (without heat, chemicals or water)
 Shred or cut, etc., whole or parts of UWED after removing batteries, lamps, and other universal wastes.
 Components of UWEDs are processed after removal (e.g., circuit boards, chips, other components).
 Resultant materials generated from treatment are scrap metal and universal waste batteries and lamps.
- D. Processing (without heat, chemicals or water)
 Size reduction, crushing, cutting, sawing, compacting, shredding
 Separation technology
 Other *please specify* _____
 Treatment residuals exhibit a hazardous waste characteristic and do not meet the definition of scrap metal or do not qualify for management as universal waste.
- E. All of the following documents are required if you have checked "D" above.
- I have attached documentation estimating the cost of facility closure prepared pursuant to title 22, California Code of Regulations, section 66265.142.
- I have attached documentation demonstrating financial assurance for closure pursuant to title 22, California Code of Regulations, section 66265.143.
- I have attached documentation demonstrating financial responsibility for liability pursuant to title 22, California Code of Regulations, section 66265.147.

G. Property Owner Notification [22 CCR sections 66273.13/33(d)(3)(F)(1)(a)(6) and 66273.83(c)(2)(A)(2)(e) or 66273.83(d)(1)(A)(2)(e)].

I have attached documentation demonstrating that I, the CRT material handler and/or UWED handler, has notified the property owner (if different from the handler) that I am conducting hazardous waste treatment and recycling operation(s) at the facility pursuant title 22, California Code of Regulations, division 4.5, chapter 23 (Universal Waste Regulations).

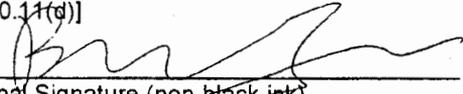
I, the CRT material handler and/or UWED handler, am the property owner of the facility specified in Section "A".

H. Inspection

I, the CRT material handler and/or UWED handler, am aware that the facility specified in Section "A" is subject to unannounced inspections by state or local agencies to verify compliance with applicable universal waste regulations, air laws, worker health and safety laws, local zoning requirements and seismic and precipitation design standard requirements.

I. Certification

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 be 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. [title 22, California Code of Regulations, division 4.5, chapter 20, section 66270.11(d)]

 General Manager 12/20/06
Original Signature (non-black ink) Title Date

J. Notifications must be submitted to DTSC by certified mail, return receipt request.

MAIL TO: Department of Toxic Substances Control
Hazardous Waste Management Program
Regulatory Program Development Division
P.O. BOX 806
Sacramento, CA 95812-0806
Attention: UWED/ CRT Materials Handling Activities

Attachment 1

Company Name	Address	Phone #	Materials
Ecology Auto Parts	13780 Imperial Highway Santa Fe Springs CA 90670	(T) 562-404-8683 Cont: Babara	Scrap Metal
CANA HOLDINGS, INC	3100 CHINO HILLS PKY., # 1232 CHINO HILLS, CA 91709	(T) 909-606-3985	Scrap Metal UWEDs Exempt Circuit Boards
Moore & Stephens	1199 S. Fairway Dr. Walnut, CA 91789	(T) 909-568-4273	Scrap Metal UWEDs Exempt Circuit Boards
GMC greenwood Management Co.	218 W. Garvey Ave., Suite 1 Monterey Park, CA 91754	(T) 347-573-6290 Cont.: Robert	Scrap Metal UWEDs Exempt Circuit Boards
Guangda Development USA Inc.	300 E. Main St. Unit # C Ontario, CA 91762	(T) 909-983-1270 Cont.: Wen Qing	Scrap Metal UWEDs Exempt Circuit Boards
USA Golden Bridge Enterprise	1476 Monterey Pass Rd. Monterey Park, CA 91754	(T) 323-268-6195 Cont.: Henry Z.	Scrap Metal UWEDs Exempt Circuit Boards
Tycoon Materials, Inc.	4965 Firenze Dr. Cypress, CA 90630	(T) 714-728-9828 Cont.: Hugh W. Wan	Scrap Metal UWEDs Exempt Circuit Boards
AERC Recycling	30677 Huntwood Ave. Hayward, CA 94544	510) 429-1129 Andrea Rodriguez	UW Lamps
Filter Recycling	180 W. Monte Ave. Rialto CA 92316	909-873-4141 Steve Masters	UW Batteries

Attachment 2

Company Name	Address	Phone #	Material
THANH DAT CO., LTD	KM NO. 4 HAI YEN HAMLET A MONG CAI TOWN, QUANG NINH PROVINCE, VIETNAM	(T) 33-778805-882455	Bare CRT
		(F)33-778805-882455	CRT Devices
		Cont: Than Dat	UWEDs UW Batteries Exempt Circuit Boards Other Scrap Metal
Wing Fat Hong Intel LTD.	Kingswood Villas. TSW. NT Hong Kong	(T) 852-9093-2002	Bare CRT
		(F)852-2422-0002	CRT Devices UWEDs UW Batteries Exempt Circuit Boards Other Scrap Metal
Kamitix LTD	FTA, 5/F, Cheerbond Court 156 Boundary St. KLN Hong Kong	(T)852-9436-6288	Bare CRT
		(F) 852-2338-7619	CRT Devices UWEDs UW Batteries Exempt Circuit Boards Other Scrap Metal
		Cont: Lau	
Eiltong Subic, Inc.	Lot 65B Golden Future St. Subic Bay Industrial Park PHI, Philippines	(T) 63-47-252-3308	Bare CRT
		Cont. : Sandy	CRT Devices UWEDs UW Batteries Exempt Circuit Boards Other Scrap Metal

Hankik Electric glass Co., LTD	150 Gongdan-Dong, Kumi-City Korea	(T) 82-54-468-1148	CRT Glass
Samsung Corning	Samsung Corning (Malaysia) SDN. BHD Lot 635 & 660 Lawasan Perindustrian Tuanku Kaafar, 71450 Sungai Gadut, Negeri Sembilan Darul Khusus, Malaysia	Tel: 06-677-9700	CRT Glass
Philip LG	LG Philips Displays Brasil Ltda. Rod. Presidente Dutra, Km 156 - Rio Comprido São José dos Campos São Paulo Brasil Zip 12240-420	Silvio Fachim Purchasing Head Ph. +55 11 21553106	CRT Glass



Attachment: 3 .

E. Cathode Ray Tube Material Treatment

2. Describe the treatment and/or recycling process(es) you will conduct.
 - When shipment arrives, each pallet of CRT will be weighted and a receiving report along with a receiving number is created.
 - CRTs will be temporarily stored on pallets in our warehouse waiting for disassembling and disposal.
 - The CRT Tubes will then be sent to our machine for crushing.
 - CRT Glass will be kept in structurally sound containers/Gaylord boxes, per DTSC, Title 22, Section 66273.83(a)(1) standard, and ship to final destination for CRT Glass Recycling.

F. Universal Waste Electronic Device Treatment

2. Describe the treatment and/or recycling process(es) you will conduct.
 - When shipment arrives, each pallets of UWEDs will be weighted and a receiving report along with a receiving number is created.
 - UWEDs will be temporarily stored on pallets in our warehouse waiting for dissembling and disposal.
 - After each unit is dissembled, we will pick out the reusable parts, boards, plastics, cords, metals, etc. These materials will then be packed into boxes or palletized and shipped to reusers such as plastic manufacturers.
 - The remaining parts will then be sent to our destruction machine for destruction under the safety guideline set by the EPA and other government agencies.
 - After these materials are being destructed, plastics, glasses, metals will be separated our again for reuse.
 - After we have separated all the reusable and recyclable material, the remaining will then be sent to disposal services.



Attachment: 4

E. Cathode Ray Tube Material Treatment

2. Describe the treatment and/or recycling process(es) you will conduct.
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 - After each unit is dissembled, we will pick out the reusable parts, boards, plastics, cords, metals, etc. These materials will then be packed into boxes or palletized and shipped to reusers such as plastic manufacturers.
 - The remaining parts will then be sent to our destruction machine for destruction under the safety guideline set by the EPA and other government agencies.
 - After these materials are being destructed, plastics, glasses, metals will be separated our again for reuse.
 - After we have separated all the reusable and recyclable material, the remaining will then be sent to disposal services.

ACORD TM **CERTIFICATE OF LIABILITY INSURANCE** DATE (MM/DD/YYYY)
12/12/2006

PRODUCER Phone: (526) 300-9000 Fax: 526-570-0908
NEW CENTURY INS SERVICES, INC.
 16 N. 2ND ST.
 ALHAMBRA CA 91801

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

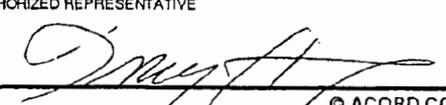
INSURED
ARC INTERNATIONAL CORP.
 911 S. BIXBY DR.
 CITY OF INDUSTRY CA 91745

INSURERS AFFORDING COVERAGE	NAIC #
INSURER A: EVANSTON INSURANCE COMPANY	
INSURER B:	
INSURER C:	
INSURER D:	
INSURER E:	

COVERAGES
 THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED, NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. AGGREGATE LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS

INSR LTR	ADDL INSR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS								
A		GENERAL LIABILITY <input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS MADE <input checked="" type="checkbox"/> OCCUR GEN'L AGGREGATE LIMIT APPLIES PER <input type="checkbox"/> POLICY <input type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC	06PKG01617	11/09/06	11/09/07	EACH OCCURRENCE \$ 5,000,000 DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 50,000 MED EXP (Any one person) \$ 5,000 PERSONAL & ADV INJURY \$ 5,000,000 GENERAL AGGREGATE \$ 5,000,000 PRODUCTS-COMP/OP AGG. \$ N/A								
		AUTOMOBILE LIABILITY <input type="checkbox"/> ANY AUTO <input type="checkbox"/> ALL OWNED AUTOS <input type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/> HIRED AUTOS <input type="checkbox"/> NON-OWNED AUTOS				COMBINED SINGLE LIMIT (Ea accident) \$ BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$								
		GARAGE LIABILITY <input type="checkbox"/> ANY AUTO				AUTO ONLY - EA ACCIDENT \$ OTHER THAN AUTO ONLY: EA ACC \$ AGG \$								
		EXCESS / UMBRELLA LIABILITY <input type="checkbox"/> OCCUR <input type="checkbox"/> CLAIMS MADE <input type="checkbox"/> DEDUCTIBLE <input type="checkbox"/> RETENTION \$				EACH OCCURRENCE \$ AGGREGATE \$ \$ \$								
		WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? If yes, describe under SPECIAL PROVISIONS below				<table border="1"> <tr> <td>WC STATUTORY LIMITS</td> <td>OTHER</td> </tr> <tr> <td>E L EACH ACCIDENT</td> <td>\$</td> </tr> <tr> <td>E L DISEASE-EA EMPLOYEE</td> <td>\$</td> </tr> <tr> <td>E L DISEASE-POLICY LIMIT</td> <td>\$</td> </tr> </table>	WC STATUTORY LIMITS	OTHER	E L EACH ACCIDENT	\$	E L DISEASE-EA EMPLOYEE	\$	E L DISEASE-POLICY LIMIT	\$
WC STATUTORY LIMITS	OTHER													
E L EACH ACCIDENT	\$													
E L DISEASE-EA EMPLOYEE	\$													
E L DISEASE-POLICY LIMIT	\$													
A		OTHER: ENVIRONMENTAL IMPAIRMENT LIABILITY CONTRACTORS POLLUTION LIABILITY	06PKG01617	11/09/06	11/09/07	LIMITS: \$5,000,000 LIMITS: \$5,000,000								

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/EXCLUSIONS ADDED BY ENDORSEMENT/ SPECIAL PROVISIONS
 THIS CERTIFICATE IS FOR INFORMATION-ONLY PURPOSES.

CERTIFICATE HOLDER	CANCELLATION
ARC INTERNATIONAL CORP. 911 S. BIXBY DR. CITY OF INDUSTRY CA 91745 Attention:	SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING INSURER WILL ENDEAVOR TO MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO DO SO SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE INSURER, ITS AGENTS OR REPRESENTATIVES. AUTHORIZED REPRESENTATIVE 



Date: December 2006

Address: 333 Turnbull Canyon Rd.
City of Industry, CA 91744

Dear Sir or Madam,

As you are aware, ARC, located at 333 Turnbull Canyon Rd, City of Industry, California, operates a facility that accepts computers and other electronic devices. These devices are considered hazardous waste in California. As part of our operations, ARC will also recycle these devices by dismantling them and then sending the components to other recyclers for further reuse. Based on these activities, we are considered a handler/recycler of universal waste electronic devices.

By way of this letter, I am notifying you, the property owner, that we are conducting a hazardous waste treatment and recycling operation at the facility pursuant to Title 22, California Code of Regulations, Division 4.5, and Chapter 23 as required by these regulations.

Sincerely,

A handwritten signature in black ink, appearing to be "Bruce Jan", written over a horizontal line.

Bruce Jan
General Manager

TRUST AGREEMENT

Trust Account Number: 6711751900

This agreement is entered into as of February 9, 2005 and between:

GRANTOR	TRUSTEE
Owner/Operator Name ARC INTERNATIONAL CORP.	Trustee Name Union Bank of California, N.A.
Address 91745 911 S Bixby Dr. City of Industry, CA	Address 120 S San Pedro St. 4 Floor, LA, CA 90012
<input checked="" type="checkbox"/> Corporation • Association <input type="checkbox"/> Partnership • Proprietorship In the State of <u>California</u>	<input checked="" type="checkbox"/> A National Bank <input type="checkbox"/> Incorporated in the State of _____

Please indicate if this Trust Agreement is for either closure and/or postclosure or liability or both.

- Closure and/or Postclosure
- Liability

Please indicate if this Trust Agreement is a Trust Agreement, a Standby Trust Agreement or both.

- Trust Agreement
- Standby Trust Agreement
- Both

TERMS OF AGREEMENT

WHEREAS, the Department of Toxic Substances Control (DTSC), a department of the State of California, has established certain regulations applicable to the Grantor, requiring that an owner or operator of a hazardous waste management facility/transportable treatment unit (TTU) shall provide assurance that funds will be available when needed for closure and/or postclosure care of the facility/TTU and/or

WHEREAS, the Department of Toxic Substances Control (DTSC), a department of the State of California, has established certain regulations applicable to the Grantor, requiring that an owner or operator of a hazardous waste management facility/TTU or group of facilities/TTUs must demonstrate financial responsibility for bodily injury and property damage to third parties caused by sudden accidental and/or nonsudden accidental occurrences arising from the operations of the facility/TTU or group of facilities/TTUs.

WHEREAS, the Grantor has elected to establish a trust to provide all or part of such financial assurance for the facilities/TTUs identified herein.

WHEREAS, the Grantor, acting through its duly authorized officers, has selected the Trustee to be the Trustee under this agreement, and the Trustee is willing to act as Trustee.

NOW, THEREFORE, the Grantor and the Trustee agree as follows:

Section 1. Definitions. As used in this Agreement:

- (a) The term "Grantor" means the owner or operator who enters into this Agreement and any successor or assigns of the Grantor.
- (b) The term "Trustee" means the Trustee who enters into this Agreement and any successor Trustee.
- (c) The term "Beneficiary" means the State of California, Department of Toxic Substances Control.

Section 2. Identification of Facilities/TTUs and Cost Estimates. This Agreement pertains to the facilities/TTUs and cost estimates identified on attached Schedule A. (On Schedule A for each facility/TTU list the hazardous waste facility/TTU US EPA identification number, name, address, and the current closure and/or postclosure cost estimates (Indicate the closure and postclosure amounts separately.), or portions thereof, for which financial assurance is demonstrated by this Agreement.)

~~Section 2.1. Identification of Facilities/TTUs. This agreement pertains to the facilities/TTUs identified on attached Schedule A. (On Schedule A for each facility/TTU, list the EPA Identification Number, name, and address of the facility(ies)/TTU(s) and the amount of liability coverage, or portions thereof, if more than one instrument affords combined coverage as demonstrated by this Agreement.)~~

Section 3. Establishment of Fund. The Grantor and the Trustee hereby establish a trust fund, the "Fund" for the benefit of the Beneficiary. The Grantor and the Trustee intend that no third party has access to the Fund except as herein provided. The Fund is established initially as consisting of the property, which is acceptable to the Trustee, described in Schedule B attached hereto. Such property and any other property subsequently transferred to the Trustee is referred to as the Fund, together with all earnings and profits thereon, less any payments or distributions made by the Trustee pursuant to this Agreement. The Fund shall be held by the Trustee, IN TRUST, as hereinafter provided. The Trustee shall not be responsible nor shall it undertake any responsibility for the amount or adequacy of, nor any duty to collect from the Grantor, any payments necessary to discharge any liabilities of the Grantor established by the Beneficiary.

~~Section 3.1. Establishment of Fund. The Grantor and Trustee hereby establish a standby trust fund, hereinafter the "Fund", for the benefit of any and all third parties injured or damaged by (sudden and/or non-sudden) _____ accidental occurrences arising from operation of the facility(ies) covered by this Guarantee, in the amounts of (up to one million dollars) _____ per occurrence and (up to two million dollars) _____ annual aggregate for sudden accidental occurrences and (up to three million dollars) _____ per occurrence and up to six million dollars) _____ annual aggregate for non sudden occurrences, except that the Fund is not establish for the benefit of third parties for the following:~~

~~(a) Bodily injury or property damage for which _____ (insert Grantor), is obligated to pay damages by reason of the assumption of liability in a contract or agreement. This exclusion does not apply to liability for damages that _____ (insert Grantor) would be obligated to pay in the absence of the contract or agreement.~~

~~(b) Any obligation of _____ (insert Grantor) under a workers' compensation, disability benefit, or unemployment compensation law or any similar law.~~

~~(c) Bodily injury to:~~

~~(1) An employee of _____ (insert Grantor) arising from, and in the course of, employment by _____ (insert Grantor); or~~

~~(2) The spouse, child, parent, brother, or sister of that employee as a consequence of, or arising from, and in the course of employment by _____ (insert Grantor). This exclusion applies:~~

~~(A) Whether _____ (insert Grantor) may be liable as an employer or in any other capacity; and~~

~~(B) To any obligation to share damages with or repay another person who must pay damages because of the injury to persons identified in paragraphs (1) and (2).~~

~~(d) Bodily injury or property damage arising out of the ownership, maintenance, use or entrustment to others of any aircraft, motor vehicle or watercraft.~~

~~(e) Property damage to:~~

~~(1) Any property owned, rented, or occupied by _____ (insert Grantor);~~

~~(2) Premises that are sold, given away or abandoned by _____ (insert Grantor) if the property damage arises out of any part of those premises;~~

~~(3) Property loaned to _____ (insert Grantor);~~

~~(4) Personal property in the care, custody or control of _____ (insert Grantor);~~

~~(5) That particular part of real property on which _____ (insert Grantor) or any contractors or subcontractors working directly or indirectly on behalf of _____ (insert Grantor) are performing operations; if the property damage arises out of these operations.~~

~~In the event of combination with another mechanism for liability coverage, the fund shall be considered _____ (insert primary) or _____ (insert excess) coverage.~~

The Fund is established initially as consisting of the property, which is acceptable to the Trustee, described in Schedule B attached hereto. Such property and any other property subsequently transferred to the Trustee is referred to as the Fund, together with all earnings and profits thereon, less any payments or distributions made by the Trustee pursuant to this Agreement. The Fund shall be held by the Trustee, IN TRUST, as hereinafter provided. The Trustee shall not be responsible nor shall it undertake any responsibility for the amount or adequacy of, nor any duty to collect from the Grantor, any payments necessary to discharge any liabilities for the Grantor established by the Beneficiary.

Section 4. Payment for Closure and Postclosure Care. The Trustee shall make payments from the Fund as the Beneficiary shall direct, in writing, to provide for the payment of the costs of closure and/or postclosure care of the facilities/TTUs covered by this Agreement. The Trustee shall reimburse the Grantor or other persons as specified by the Beneficiary from the Fund for closure and post closure expenditures in such amounts as the Beneficiary shall direct in writing. In addition, the Trustee shall refund to the Grantor such amounts as the Beneficiary specifies in writing. Upon refund, such funds shall not constitute part of the Fund as defined herein.

Section 4.1. Payment for Bodily Injury or Property Damage. The Trustee shall satisfy a third party liability claim by making payments from the Fund only upon receipt of one of the following documents:

(a) Certification from the Grantor and the third party claimant(s) that the liability claim should be paid. The certification must be worded as follows, except that instructions in brackets are to be replaced with the relevant information and the brackets deleted.

Certification of Valid Liability Claim

The undersigned, as parties _____ (insert name of Grantor) and _____ (insert name and address of third party claimant(s)), hereby certify that the claim of bodily injury and/or property damage caused by (sudden or nonsudden) accidental occurrence arising from operating hazardous waste treatment, storage, or disposal facility/TTU should be paid in the amount of \$ _____.

(Signature)
(Grantor) _____
(Grantor) _____

(Signature)
(Claimant(s)) _____
(Claimant(s)) _____

or (b) A valid final court order, establishing a judgment against the Grantor for bodily injury or property damage caused by sudden or nonsudden accidental occurrences arising from the operation of the Grantor's facility/TTU or group of facilities/TTUs.

Section 5. Payments Comprising the Fund. Payments made to the Trustee for the Fund shall consist of cash or securities acceptable to the Trustee.

Section 6. Trustee Management. The Trustee shall invest and reinvest the principal and income of the Fund and keep the Fund invested as a single fund, without distinction between principal and income, in accordance with general investment policies and guidelines which the Grantor may communicate in writing to the Trustee from time to time, subject, however, to the provisions of this section. In investing, reinvesting, exchanging, selling, and managing the Fund, the Trustee shall discharge his or her duties with respect to the trust fund solely in the interest of the Beneficiary and with the care, skill, prudence, and diligence under the circumstances then prevailing which persons of prudence, acting in a like capacity and familiar with such matters, would use in the conduct of an enterprise of a like character and with like aims, except that:

(i) Securities or other obligations of the Grantor, or any other owner or operator of the facilities/TTUs, or any of their affiliates as defined in the Investment Company Act of 1940, as amended, 15 U.S.C. 80a-2(a), shall not be acquired or held, unless they are securities or other obligations of the Federal or State Government.

(ii) The Trustee is authorized to invest the Fund in time or demand deposits of the Trustee, to the extent insured by an agency of the Federal or State Government, and

(iii) The Trustee is authorized to hold cash awaiting investment or distribution uninvested for a reasonable time and without liability for the payment of interest thereon.

Section 7. Commingling and Investment. The Trustee is expressly authorized in its discretion:

(a) To transfer from time to time any or all of the assets of the Fund to any common, commingled or collective trust fund created by the Trustee in which the Fund is eligible to participate, subject to all of the provisions thereof, to be commingled with the assets of other trusts participating therein; and

(b) To purchase shares in any investment company registered under the Investment Company Act of 1940, 15 U.S.C. 80a-1 et seq., including one which may be created, managed, underwritten or to which investment advice is rendered or the shares of which are sold by the Trustee. The Trustee may vote such shares in its discretion.

Section 8. Express Powers of Trustee. Without in any way limiting the powers and discretion conferred upon the Trustee by the other provisions of this Agreement or by law, the Trustee is expressly authorized and empowered:

(a) To sell, exchange, convey, transfer or otherwise dispose of any property held by it, by public or private sale. No person dealing with the Trustee shall be bound to see to the application of the purchase money or to inquire into the validity or expediency of any such sale or other disposition;

(b) To make, execute, acknowledge and deliver any and all documents of transfer and conveyance and any and all other instruments that may be necessary or appropriate to carry out the powers herein granted;

(c) To register any securities held in the Fund in its own name or in the name of a nominee and to hold any security in bearer form or in book entry, or to combine certificates representing such securities with certificates of the same issue held by the Trustee in other fiduciary capacities, or to deposit or arrange for the deposit of such securities in a qualified central depository even though, when so deposited, such securities may be merged and held in bulk in the name of the nominee of such depository with other securities deposited therein by another person, or to deposit or arrange for the deposit of any securities issued by the United States Government, or any agency or instrumentality thereof, with a Federal Reserve bank, but the books and records of the Trustee shall at all times show that all such securities are part of the Fund;

(d) To deposit any cash in the Fund in interest-bearing accounts maintained or savings certificates issued by the Trustee, in its separate corporate capacity, or in any other banking institution affiliated with the Trustee, to the extent insured by an agency of the Federal or State Government; and

(e) To compromise or otherwise adjust all claims in favor of or against the Fund.

Section 9. Taxes and Expenses. All taxes of any kind that may be assessed or levied against or in respect of the Fund and all brokerage commissions incurred by the Fund shall be paid from the Fund. All other expenses incurred by the Trustee in connection with the administration of this Trust, including fees for legal services rendered to the Trustee, the compensation of the Trustee to the extent not paid directly by the Grantor, and all other proper charges and disbursements of the Trustee shall be paid from the Fund.

Section 10. Annual Valuation. The Trustee shall annually, at least 30 days prior to the anniversary date of establishment of the Fund, furnish to the Grantor and to the Beneficiary a statement confirming the value of the Trust. Any securities in the Fund shall be valued at market value as of no more than 60 days prior to the anniversary date of establishment of the Fund. The failure of the Grantor to object in writing to the Trustee within 90 days after the statement has been furnished to the Grantor and Beneficiary shall constitute a conclusively binding assent by the Grantor, barring the Grantor from asserting any claim or liability against the Trustee with respect to matters disclosed in the statement.

Section 11. Advice of Counsel. The Trustee may from time to time consult with counsel, who may be counsel to the Grantor; with respect to any question arising as to the construction of this Agreement or any action to be taken hereunder. The Trustee shall be fully protected, to the extent permitted by law, in acting upon the advice of counsel.

Section 12. Trustee Compensation. The Trustee shall be entitled to reasonable compensation for its services as agreed upon in writing from time to time with the Grantor.

Section 13. Successor Trustee. The Trustee may resign or the Grantor may replace the Trustee, but such resignation or replacement shall not be effective until the Grantor has appointed a successor trustee and this successor accepts the appointment. The successor trustee shall have the same powers and duties as those conferred upon the Trustee hereunder. Upon the successor trustee's acceptance of the appointment, the Trustee shall assign, transfer and pay over to the successor trustee the funds and properties then constituting the Fund. If, for any reason, the Grantor cannot or does not act in the event of the resignation of the Trustee, the Trustee may apply to a court of competent jurisdiction for the appointment of a successor trustee or for

instructions. The successor trustee shall specify the date on which it assumes administration of the trust in a writing sent to the Grantor, Beneficiary, and the present Trustee by certified mail ten days before such change becomes effective. Any expenses incurred by the Trustee as a result of any of the acts contemplated by this Section shall be paid as provided in Section 9.

Section 14. Instructions to the Trustee. All orders, requests and instructions by the Grantor to the Trustee shall be in writing, signed by such persons as are designated in the attached Exhibit A or such other designees as the Grantor may designate by amendment to Exhibit A. The Trustee shall be fully protected in acting without inquiry in accordance with the Grantor's orders, requests and instructions. All orders, requests and instructions by the Beneficiary to the Trustee shall be in writing, signed by the Beneficiary designees, and the Trustee shall act and shall be fully protected in acting in accordance with such orders, requests and instructions. The Trustee shall have the right to assume, in the absence of written notice to the contrary, that no event constituting a change or a termination of the authority of any person to act on behalf of the Grantor or the Beneficiary hereunder has occurred. The Trustee shall have no duty to act in the absence of such orders, requests and instructions from the Grantor and/or Beneficiary, except as provided for herein.

Section 15. Notice of Nonpayment. The Trustee shall notify the Grantor and the Beneficiary, by either registered or certified mail within 10 days following the expiration for the 30-day period after the anniversary of the establishment of the Trust, if no payment is received from the Grantor during that period. After the pay-in period is completed, the Trustee shall not be required to send a notice of nonpayment.

~~Section 15.1. Notice of Nonpayment. If a payment for bodily injury or property damage is made under Section 4 of this Trust, the Trustee shall notify the Grantor of such payment and the amount(s) thereof within five (5) working days. The Grantor shall, on or before the anniversary date of the establishment of the Fund following such notice, either make payments to the Trustee in amounts sufficient to cause the Trust to return to its value immediately prior to the payment of claims under Section 4, or shall provide written proof to the Trustee that other financial assurance for liability coverage has been obtained equaling the amount necessary to return the Trust to its value prior to the payment of claims. If the Grantor does not either make payments to the Trustee or provide the Trustee with such proof, the Trustee shall within 10 working days after the anniversary date of the establishment of the Fund provide a written notice of non payment to the Beneficiary.~~

Section 16. Amendment of Agreement. This agreement may be amended by an instrument in writing executed by the Grantor, the Trustee and the Beneficiary, or by the Trustee and the Beneficiary, if the Grantor ceases to exist.

Section 17. Irrevocability and Termination. Subject to the right of the parties to amend this Agreement as provided in Section 16, this Trust shall be irrevocable and shall continue until terminated at the written agreement of the Grantor, the Trustee, and the Beneficiary, or by the Trustee and the Beneficiary, if the Grantor ceases to exist. Upon termination of the Trust, all remaining trust property, less final trust administration expenses, shall be delivered to the Grantor.

Section 18. Immunity and Indemnification. The Trustee shall not incur personal liability of any nature in connection with any act or omission, made in good faith, in the administration of this Trust, or in carrying out any directions by the Grantor or the Beneficiary issued in accordance with this Agreement. The Trustee shall be indemnified and saved harmless by the Grantor or from the Trust Fund, or both, from and against any personal liability to which the Trustee may be subjected by reason of any act or conduct in its official capacity, including all expenses reasonably incurred in its defense in the event the Grantor fails to provide such defense.

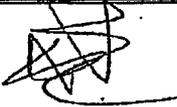
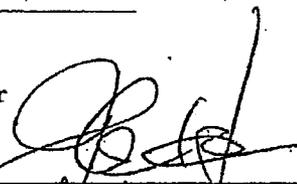
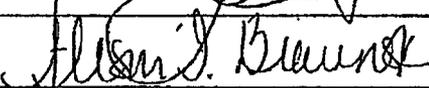
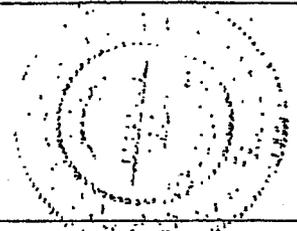
Section 19. Choice of Law. This Agreement shall be administered, construed and enforced according to the laws of the State of California.

Section 20. Interpretation. As used in this Agreement, words in the singular include the plural and words in the plural include the singular. The descriptive headings for each Section of this Agreement shall not affect the interpretation or the legal efficacy of this Agreement.

Section 21. Primary or Excess Coverage. In the event this trust fund is used in combination with another mechanism coverage for closure and/or postclosure care, this fund shall be considered (insert "primary" or "excess") Primary coverage.

~~Section 21.1 Primary or Excess Coverage. In the event of combination with another mechanism for liability coverage, the fund shall be considered (insert "primary" or "excess") _____ coverage.~~

IN WITNESS WHEREOF the parties have caused this Agreement to be executed by their respective officers duly authorized and their corporate seals to be hereunto affixed and attested as of the date first above written; the parties below certify that this document is being executed in accordance with the requirements of California Code of Regulations, Title 22, Division 4.5, Chapter 14 and 15. Article 8, Sections 66264.140 through 66264.148 and Sections 66265.140 through 66265.148.

Signature of Grantor 	Title CFO
Typed or Printed Name of Person Signing <u>SHAN HOOPER</u>	Seal
Attest: Title Jay Hooper President 	
Signature of Trustee  Typed or Printed Name of Person Signing <u>Alison T. Braunstein</u>	Title Vice President Seal 
Attest: Title  V.P.	

PRIVACY STATEMENT

This information is requested by the Department of Toxic Substances Control, under Health and Safety Code, Section 25245, in order to verify adequate financial assurance of hazardous waste facilities/TTUs. Completion of the form is mandatory. The consequence of not completing the form is denial of a permit to operate a hazardous waste facility/TTU. Information may be provided to U. S. Environmental Protection Agency, State Attorney General, Air Resources Board, California Integrated Waste Management Board, Energy Resources Conservation and Development Commission, Water Resources Control Board and California Regional Water Quality Control Boards. For more information or access to your records, contact the Department of Toxic Substances Control, 8800 Cal Center Drive, Sacramento, California, 95826, (916) 255-3545.

EXHIBIT A

TRUST AGREEMENT BY AND BETWEEN ARC International Corp.

AND THE Union Bank of California, N.A.

As provided for in Section 14 of the Trust Agreement, the persons, other than the officials of the Beneficiary identified in Section 14 of the Trust Agreement, who, until this Exhibit A is amended, shall have the authority to make orders, requests, and instructions to the Trustee are:

Officials of the Grantor.

Officials of the Grantor who have authority to give instructions are:

Name(s): Shan Hooper

Title(s): CFO

EXHIBIT A

Any orders, requests or instructions by the Grantor to the Trustee, pursuant to the foregoing Agreement, may be signed by any one of the following persons:

Name(s): Shan Hooper

Title(s): CFO

**TRUST AGREEMENT/STANDBY TRUST
SCHEDULE A**

This Agreement demonstrates financial assurance for the following cost estimate(s) for the following facility(ies)/TTU(s):

Hazardous Waste Facility/TTU Identification Number	Name of Facility/TTU	Address of Hazardous Waste Facility/TTU	Cost Estimates for which Financial Assurance Being Demonstrated by this Agreement
	ARC INTERNATIONAL CORP.	911 S. BIXBY DR. CITY OF INDUSTRY CA, 91745	Closure: \$47,000.00 Postclosure: Closure: Postclosure: Closure: Postclosure: Total: \$47,000.00

The cost estimates listed here were last adjusted on (date): 1/10/2005

This Agreement demonstrates financial assurance for liability coverage for the following facility(ies)/TTU(s): CAL 000273749

Hazardous Waste Facility/TTU Identification Number	Name of Facility/TTU	Address of Hazardous Waste Facility/TTU	Liability Coverage Being Demonstrated by this Agreement
			Sudden per occurrence: Sudden Annual aggregate: Nonsudden per occurrence: Nonsudden Annual aggregate: Sudden per occurrence: Sudden Annual aggregate: Nonsudden per occurrence: Nonsudden Annual aggregate: Sudden per occurrence: Sudden Annual aggregate: Nonsudden per occurrence: Nonsudden Annual aggregate: Total aggregate:

The Liability coverage listed here is effective on (date): _____

TRUST AGREEMENT (ONLY)
SCHEDULE B

The fund is established initially as consisting of the following:

\$ 50,000.00 Fifty Thousand Dollars***** as evidenced by
Amount Spell Out Dollar Amount

East West Bank Check Number 10947
Name of Institution Drawn On

dated 02/08/2005

I hereby certify that funds have been received and deposited.

Table with 2 columns: Authorized Signature, Title, Typed or Printed Name of Person Signing, Address. Contains signature of Alison T. Braunstein and address of Union Bank of California.

STANDBY TRUST AGREEMENT (ONLY)

SCHEDULE B

List of Property Compromising Trust Fund

None at the time of the trust establishment. Funding of this Standby Trust Agreement is contingent upon drafts against that primary,

Surety Bond or Letter of Credit number and issued by the
Issuing Institution on Date in

accordance with the terms of that Surety Bond or Letter of Credit

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

State of California

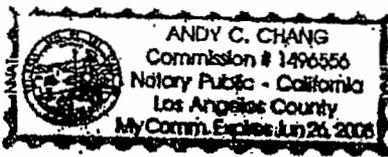
County of Los Angeles } ss.

On Feb 8th 2015 before me, ANDY C. CHANG

personally appeared STAN HOOPER

personally known to me
 proved to me on the basis of satisfactory evidence

to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.



WITNESS my hand and official seal.

 Signature of Notary Public

OPTIONAL

Though the information below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.

Description of Attached Document

Title or Type of Document: _____

Document Date: _____ Number of Pages: _____

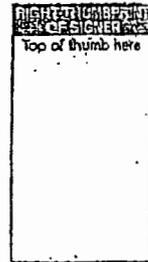
Signer(s) Other Than Named Above: _____

Capacity(ies) Claimed by Signer

Signer's Name: _____

- Individual
- Corporate Officer — Title(s): _____
- Partner — Limited General
- Attorney-in-Fact
- Trustee
- Guardian or Conservator
- Other: _____

Signer Is Representing: _____



FINANCIAL ASSURANCE CHECKLIST FOR TRUST FUNDS

Parent Company Name & Address:

Facility Name & Address: *ARC International Corp.
911 S. Bixby Drive
Industry, CA 91745*

EPA ID No.: *CAL000273749*

Facility Contact Person/Title: *Kara Yu*

Facility Contact Phone No.: *(626) 855-8011*

Instrument Covers (Circle all that apply): Closure Postclosure Sudden Liability Nonsudden Liability

Land Disposal Facility (Circle one): Yes No

Trustee Name & Address: *Union Bank of California, N.A.
120 S. San Pedro St., 4th Floor
Los Angeles, CA 90012*

Trustee Contact Person/Title: *Alison Braunstein / Vice President*

Trustee Contact Phone No.: *(213) 972-5674*

Trust Fund Effective Date: *2/9/2005*

Trust Fund Expiration Date: *—*

Trust Fund Instrument No.: *6711751900*

Number of Years Remaining
in the Trust Fund Pay-in
Period (N/A for liability):
8

Current Value of Trust Fund: Closure: \$ *51,463.91 (03/31/02)* Postclosure: \$

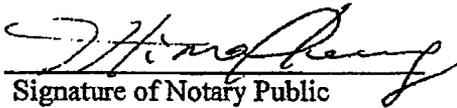
	Trust Fund	Department Requirements
Closure Amount	<i>\$ 47,000</i>	<i>*\$ 43,800</i>
Closure Source Document	<i>Schedul A</i>	<i>Per Inspector</i>
Closure Document Date	<i>2/9/05</i>	<i>1/21/05</i>
Postclosure Amount	<i>/</i>	<i>/</i>
Postclosure Source Document	<i>/</i>	<i>/</i>
Postclosure Document Date	<i>/</i>	<i>/</i>

* Adjusted for inflation, the current closure cost estimate = \$ 44,720

ACKNOWLEDGEMENT FOR TRUST AGREEMENT

Sate of California
County of Los Angeles

On this 4/17/06, before me personally came Rebecca Hooper to me known, who, being by me duly sworn, did depose and say that she resides at 18 Bishop CT Arcadia, California 91006, that she is the CFO of ARC International Corp., the corporation described in and which executed the above instrument; that he knows the seal of said corporation; that the seal affixed to such instrument is such corporate seal; that it was so affixed by order of the Board of Directors of said corporation, and that she signed her name thereto by like order.


Signature of Notary Public



MINNA CHANG
Printed Name of Notary Public

4/18/06
Date

ALL-PURPOSE ACKNOWLEDGMENT

State of California

County of Los Angeles } SS.

On 4/18/06 before me, MINNA CHANG
(DATE) (NOTARY)

personally appeared REBECCA HOOPER
SIGNER(S)

personally known to me - OR - proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.



WITNESS my hand and official seal.

Minna Chang
NOTARY'S SIGNATURE

OPTIONAL INFORMATION

The information below is not required by law. However, it could prevent fraudulent attachment of this acknowledgment to an unauthorized document.

CAPACITY CLAIMED BY SIGNER (PRINCIPAL)

- INDIVIDUAL
- CORPORATE OFFICER

- PARTNER(S)
- ATTORNEY-IN-FACT
- TRUSTEE(S)
- GUARDIAN/CONSERVATOR
- OTHER: _____

SIGNER IS REPRESENTING:
NAME OF PERSON(S) OR ENTITY(IES)

DESCRIPTION OF ATTACHED DOCUMENT

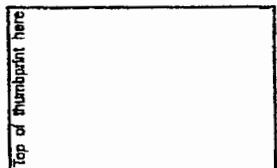
Acknowledgment for Trust Agreement
TITLE OR TYPE OF DOCUMENT

ONE (1)
NUMBER OF PAGES

4/18/06
DATE OF DOCUMENT

OTHER _____

RIGHT THUMBPRINT
OF
SIGNER



UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA

(NAME OF COURT)

As part of the naturalization process, you have the opportunity to legally change your name. Please complete lines 1 - 8 (Type or print clearly).

My full and correct name (current name):

1. REBECCA SHAN IIANG HOOPER
(FIRST) (MIDDLE) (LAST)

2. Address: 18 Bishop Ct Arcadia, CA 91006
(Number/Street) (City/State) (Zip Code)

3. Country of Nationality: China, People's Republic Of 4. Date of Birth: 03/10/1971
(Month) (Day) (Complete Year)

5. Alien Registration Card (Green Card) Number: A 075 684 180

6. I certify that I am not seeking a change of name for any unlawful purpose such as the avoidance of debt or evasion of law enforcement.

7. I petition the court to change my name to:

REBECCA HOOPER
(FIRST) (MIDDLE) (LAST)

8. Date: 4/15/2005 [Signature]
Signature of Petitioner, (current name)

CERTIFICATION OF NAME CHANGE

I CERTIFY THAT THE ABOVE PETITION WAS GRANTED BY THE COURT ON MAY 23 2005
(Date)

SHERILL R. CARTER
(Clk)
Rose Marie Ash
(Deputy Clerk)

IMPORTANT INFORMATION

Your copy of this petition, along with your Certificate of Naturalization, which you will receive upon taking the oath of allegiance, will verify that you elected to change your name. Your Certificate of Naturalization bears your new name as changed per Order of the Court.

State of California-California Environmental Protection Agency

Department of Toxic Substances Control

LIABILITY CERTIFICATE OF INSURANCE

If additional space is needed, add attachment.

Insurer Name: Westchester Surplus Lines Ins. Co.		Insured Name: ARC International Corp.	
Insurer Address: 438 Walnut Street Philadelphia, PA 19106		Insured Address: 991 Sixby Drive City of Industry, CA 91745	
License Number: NAIC 10172	Issued by State of: Georgia		

Hazardous Waste Facilities/TTUs Covered:

Hazardous Waste Facilities/TTUs Covered: [Enter Information For Each Facility/TTU]			LIMITS OF LIABILITY.	
Name	Address	Hazardous Waste Facility/TTU Identification Number	Sudden* Occurrences Each Occurrence/Annual Aggregate Amount	Non-sudden* Occurrences Each Occurrence/Annual Aggregate Amount
ARC International Corp.	911 Sixby Drive City of Industry, CA 91745		\$1,000,000/ \$2,000,000	\$1,000,000/ \$2,000,000
Policy Number G22064358 002		Effective Date 3-1-2006	Total \$1,000,000/ \$2,000,000	Total \$1,000,000/ \$2,000,000

* Excluding legal costs and deductibles

Insurer Certification

1. The insurer hereby certifies that it has issued liability insurance covering bodily injury and property damage to the insured in connection with the insured's obligation to demonstrate financial responsibility under California Code of Regulations, title 22, division 4.6, chapter 14 and 15, article 8, sections 66264.147 and 66265.147. The coverage applies at the facilities/transportable treatment units (TTU) listed above for:

- sudden accidental non-sudden accidental occurrences, or both.

The coverage provided by the above policy is

- primary coverage excess coverage

If excess coverage, the primary coverage mechanism shall also be demonstrated.

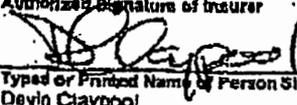
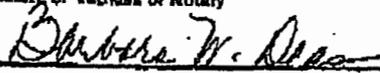
2. The insurer further certifies the following with respect to the insurance described above:

- (a) Bankruptcy or insolvency of the insured shall not relieve the insurer of its obligations under the policy.
- (b) The insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in California Code of Regulations, title 22, division 4.6, chapter 14 and 15, article 8, section 66264.147 and 66265.147.
- (c) Whenever requested by the Department of Toxic Substances Control (DTSC), the insurer agrees to furnish to DTSC a signed duplicate of the original of the policy and all endorsements.
- (d) Cancellation of the insurance, whether by the insurer, the insured, a parent corporation providing insurance coverage for its subsidiary, or by a firm having an insurable interest in and obtaining liability insurance on behalf of the owner or operator of the hazardous waste management facility/TTU will be effective only upon written notice and only after the expiration of 90 days after a copy of such written notice is received by DTSC as evidenced by a duly executed return receipt.
- (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the DTSC as evidenced by a duly executed return receipt.

State of California-California Environmental Protection Agency

Department of Toxic Substances Control

I hereby certify that the wording of this instrument is identical to the wording specified in California Code of Regulations, title 22, section 69254.151, subsection (j), is being executed in accordance with California Code of Regulations, title 22, division 4.5, chapter 14 and 15, article 8, and that the insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more states.

Authorized Signature of Insurer 	Title AVP
Typed or Printed Name of Person Signing Devin Claypool	
Signature of Witness or Notary 	Date 4-13-2006

PRIVACY STATEMENT

This information is requested by the Department of Toxic Substances Control under Health and Safety Code section 25245, in order to verify adequate financial assurance of hazardous waste facilities/transportable treatment units (TTU). Completion of this form is mandatory. The consequence of not completing the form is denial of a permit to operate a hazardous waste facility/TTU. Information may be provided to the U. S. Environmental Protection Agency, State Attorney General, Air Resources Board, California Integrated Waste Management Board, Energy Resources Conservation and Development Commission, Water Resources Control Board, and California Regional Water Quality Control Boards. For more information or access to your records, contact the Department of Toxic Substances Control, 8800 Cal Center Drive, Sacramento, California 95826, (916) 255-8545.

SUMMARY OF VIOLATIONS

On AUGUST 9, 2006, the Department of Toxic Substances Control (DTSC), California Environmental Protection Agency, conducted an inspection at:

Facility Name: ARC INTERNATIONAL

Facility Address: 911 SOUTH BIXBY DRIVE, CITY OF INDUSTRY, CA 91745

EPA ID Number: CAL000293749

County Name: LOS ANGELES

As a result of that inspection, the 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. If you disagree with any of the violations listed in Section I, you must give the inspector who issued the Notice to Comply a written notice of disagreement.

You must correct the violations listed in Section III: Minor Violations, within 0 days. Within five working days of achieving compliance, you must sign the statement certifying compliance at the bottom of Section III and return it to DTSC at the address 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 violation. DTSC may reinspect this facility at any time.

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 or the findings of the report. 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 that have not been corrected within the time provided in the Notice to comply.

Company Representative Accepting Summary

Name Gordon Liu

Title Environmental Compliance

Signature Gordon Liu

Date 08/09/06

Department Representative

Name Cathleen Chavez

Title HAZ. SUBSTANCES SCIENTIST

Signature Cathleen Chavez

Date 8/9/06

SUMMARY OF VIOLATIONS

Facility Name: ARC INTERNATIONAL Date: AUGUST 9, 2006

SECTION I: CLASS I VIOLATIONS AND REQUIRED CORRECTIVE ACTION

① ILLEGAL DISPOSAL

ARC INTERNATIONAL INC. VIOLATED CALIFORNIA CODE OF REGULATIONS (CCR), TITLE 22, SECTION 66273.81 (a) ^{and HSC 25189.2 (c)} ON OR ABOUT AUGUST 9, 2006, ARC DISPOSED CRT GLASS ON ADJACENT PROPERTY.

EVIDENCE: OBSERVATIONS BY ELLEN PATES and CATHIE CHAVEZ
STATEMENTS BY OPERATORS
PHOTOGRAPHS - CRT GLASS ON DIRT and GAYLORD BOXES CONTAINING DIRT and ~~CRUSHED~~ CRUSHED CRT GLASS and TRASH BIN

SCHEDULE OF COMPLIANCE:

EFFECTIVE IMMEDIATELY, ARC INTERNATIONAL INC. SHALL SUBMIT A CLEAN-UP PLAN FOR APPROVAL TO THE DEPARTMENT AND WILL IMPLEMENT APPROVE PLAN. THIS PLAN IS FOR OFFSITE DISPOSAL TO DIRT ON ADJACENT PROPERTIES.

② RESPONSE TO RELEASES

ARC INTERNATIONAL INC. VIOLATED CCR, TITLE 22, SECTION 66273.87(a), ON OR ABOUT AUGUST 9, 2006, ARC FAILED TO IMMEDIATELY CONTAIN ALL RELEASES OF CRT MATERIAL AND RESIDUES FROM CRT MATERIALS.

EVIDENCE: OBSERVATION BY MS. CHAVEZ and ELLEN PATES
PHOTOGRAPHS - CRT GLASS INSIDE BUILDING, IN PARKING LOT and UNDER PROCESSORS.

SCHEDULE OF COMPLIANCE: EFFECTIVE IMMEDIATELY, ARC SHALL PROPERLY CONTAIN ALL RELEASES OF CRT MATERIALS and RESIDUES (GLASS). ARC MUST PROVIDE A CLEAN-UP PLAN FOR PARKING LOT RELEASES AND GLASS STORAGE AREAS INSIDE THE WAREHOUSE

SUMMARY OF VIOLATIONSFacility Name: ARC INTERNATIONAL INC Date: AUGUST 9, 2006**Continuation Sheet for SECTION I: CLASS I VIOLATIONS
AND REQUIRED CORRECTIVE ACTION****(3) WASTE MANAGEMENT**

ARC INTERNATIONAL INC. VIOLATED CALIFORNIA CODE OF REGULATIONS, TITLE 22, SECTION 66273.83 (a)(1), ON OR ABOUT AUGUST 8, 2006, ^{9 SEP.} ARC INTERNATIONAL FAILED TO CONTAIN ANY CRT MATERIALS IN CONTAINERS OR PACKAGES THAT ARE STRUCTURALLY SOUND, ADEQUATE TO PREVENT BREAKAGE.

EVIDENCE: OBSERVATIONS BY INSPECTORS
PHOTOGRAPHS -- BROKEN AND PUNCTURED GAYLORD BOXES
TORNED/RE-USED GAYLORD BOXES

SCHEDULE OF COMPLIANCE:

W/IN 30 DAYS, ARC INTERNATIONAL SHALL CONTAIN ANY CRT MATERIALS IN CONTAINERS OR PACKAGES THAT ARE STRUCTURALLY SOUND.

(4) CRT TREATMENT

ARC INTERNATIONAL INC. VIOLATED CER, TITLE 22, SECTION 66273.83 (d)(9) ON OR ABOUT AUGUST 9, 2006, ARC FAILED TO ENSURE ALL TREATMENT IS CONDUCTED OVER OR IN A CONTAINMENT DEVICE SUFFICIENT IN SIZE AND CONSTRUCTION TO CONTAIN ANY CRT GLASS THAT MAY BE RELEASED.

SUMMARY OF VIOLATIONS

Facility Name: APC INTERNATIONAL INC Date: AUGUST 9, 2006

**Continuation Sheet for SECTION I: CLASS I VIOLATIONS
AND REQUIRED CORRECTIVE ACTION**

EVIDENCE: OBSERVATIONS OF INSPECTORS
PHOTOGRAPHS

SCHEDULE OF COMPLIANCE:

EFFECTIVE IMMEDIATELY, CEASED ALL OPERATIONS OF
ALL TREATMENT UNITS (CPT PROCESSING EQUIPMENT)

Cathode Ray Tube (CRT) Material Handler (MH) Inspection Report

Facility Name: ARC INTERNATIONAL
 Identification Number: CA000293749
 Facility Address: 911 SOUTH BIXBY DRIVE
CITY OF INDUSTRY, CA 91745
 Date Inspected: AUGUST 9, 2006
 Inspected By: CATHLEEN CHAVEZ and ELLEN PATES
 Type of Inspection: Annual Re-inspection Complaint
 Consent given by: GORDON LIU Time: 10:30 AM

DISCLAIMER

This checklist is intended to provide guidance only. This checklist does not replace or supersede relevant statutes and regulations. The information contained in this checklist is based upon the statutes and regulations in effect as of the date the checklist was signed. Interested parties are advised to keep apprised of subsequent changes to relevant statutes and regulations.

Citations that start with the number "66" are to the California Code of Regulations (CCR), title 22, division 4.5. Citations that start with the number "42" are to the Public Resources Code, division 30, part 3, chapter 8.5.

If the CRT Recycler is a permitted Hazardous Waste (HW) Facility, the inspector shall contact DTSC staff responsible for maintaining that facility's permit to determine if additional requirements apply to CRT activities carried out at the facility.

REGULATED WASTES

CRTs (AKA covered electronic devices) are defined as a cathode ray tube, cathode ray tube device, flat panel screen, or any other similar video display device with a screen size that is greater than four inches in size measured diagonally and which the DTSC determines, when discarded or disposed, would be a hazardous waste pursuant to Chapter 6.5 (commencing with Section 25100) of Division 20 of the Health and Safety Code. [42463(f)(1)]

Check box if violation: (if checked see attached SOV)

PROHIBITIONS	
<input checked="" type="checkbox"/>	Disposed of a CRT material. [66273.81(a)]
<input type="checkbox"/>	Diluted or treated a CRT material unless requirements of this section are met. [66273.81(b)]
NOTIFICATION & ANNUAL REPORT	
<input type="checkbox"/>	Failed to notify DTSC at least 30 days prior to accepting any CRT materials from an offsite source. [66273.82(a)]
<input type="checkbox"/>	Failed to submit an annual report to DTSC, if CRT MH accepted >5 CRTs, >5 CRT devices, or >100 kg of CRT glass per calendar year from any offsite source. [66273.82(b)(2)]
<input type="checkbox"/>	Failed to submit annual report to DTSC, if CRT MH generates ≥5,000 kg of CRT material per calendar year. [66273.82(b)(3)]
<input type="checkbox"/>	Failed to submit written annual report to DTSC by February 1 of each calendar year. [66273.82(b)]
<input type="checkbox"/>	Submitted an incomplete notification or annual report. [66273.82(a) & (b)(4)]
<input type="checkbox"/>	A CRT MH who performs data conversions derived from mass data failed to include the conversion factor(s) in the annual report. [66273.82(c)]
<input type="checkbox"/>	Failed to submit a written notification or annual report by certified mail, return receipt. [66273.82(d)]

WASTE MANAGEMENT	
<input checked="" type="checkbox"/>	Failed to contain any CRT materials in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the container. [66273.83(a)(1)]
<input checked="" type="checkbox"/>	Failed to immediately clean up and place in a container any CRT material that is broken or shows evidence of breakage, leakage, or damage. [66273.83(a)(2)]
<input type="checkbox"/>	Failed to safely remove CRTs from CRT devices. [66273.83(b)(1)]
<input type="checkbox"/>	Failed to determine whether any of the remaining portions of the CRT device or any other waste generated during the removal process exhibits any characteristic of a HW. [66273.83(b)(2)]
YOKE REMOVAL	
<input type="checkbox"/>	Failed to remove yoke without breaking CRT glass and MH does not meet treatment/recycling standards. [66273.83(c)(1)]
<input type="checkbox"/>	Failed to submit complete notification by certified mail regarding yoke removal. [66273.83(c)(2)]
<input type="checkbox"/>	Failed to maintain notification, air permit and other permits (as required), and produce these documents when requested. [66273.83(c)(3)]

<input type="checkbox"/>	Failed to submit the annual report to DTSC by February 1 of each calendar year and by certified mail. [66273.83(c)(4)]
<input type="checkbox"/>	Accepted CRTs or CRT devices that are managed, or are required to be managed as hazardous waste. [66273.83(c)(5)]
<input type="checkbox"/>	Failed to conduct treatment for the purpose of recycling the CRTs or CRT devices. [66273.83(c)(6)]
<input type="checkbox"/>	Failed to ensure all treatment is conducted over or in a containment device sufficient in size and construction to contain any CRT glass that may be released during yoke removal. [66273.83(c)(7)]
<input type="checkbox"/>	Failed to utilize only mechanical methods to remove the yoke. [66273.83(c)(8)]
<input type="checkbox"/>	Used heat, chemicals, or water in yoke removal process. [66273.83(c)(9)]
<input type="checkbox"/>	Failed to ensure that all persons that perform treatment are thoroughly familiar with hazards and have access to proper procedures and protective equipment necessary to safely conduct treatment and to comply with applicable requirements. [66273.83(c)(10)]
<input type="checkbox"/>	Failed to ensure that the facility is operated in compliance with all applicable local and state air pollution control laws and regulations. [66273.83(c)(11)]
<input type="checkbox"/>	Failed to ensure that the facility is operated in compliance with all applicable worker health and safety laws and regulations. [66273.83(c)(12)]
<input type="checkbox"/>	Failed to ensure that all materials generated as a result of the treatment processes are classified and managed properly. [66273.83(c)(13)]
<input type="checkbox"/>	Failed to ensure that the activities conducted at the facility are consistent with local zoning or land use requirements. [66273.83(c)(14)]
<input type="checkbox"/>	Failed to maintain compliance with location, seismic, and precipitation design standards requirements. [66273.83(c)(15)]
CRT TREATMENT OR RECYCLING	
<input type="checkbox"/>	Failed to notify DTSC no later than 30 days prior to treating or recycling the CRT material. [66273.83(d)(1)(A)(1)]
<input type="checkbox"/>	Failed to notify DTSC no later than 30 days prior to ceasing treatment or recycling activities. [66273.83(d)(1)(A)3]
<input type="checkbox"/>	Failed to notify the DTSC no later than 30 days after ceasing treatment or recycling activities. [66273.83(d)(1)(A)3]
<input type="checkbox"/>	Failed to complete notification and sign, and date notification as specified in title 22 CCR 66270.11. [66273.83(d)(1)(A)2, 4, 5 and 66273.83(d)(1)(B)]

<input type="checkbox"/>	Failed to submit to DTSC by certified mail a cost estimate for closure no later than 30 days prior to recycling or treating CRT materials. [66273.83(d)(2)]
<input type="checkbox"/>	Failed to submit to DTSC documentation demonstrating financial assurance for closure no later than 30 days prior to recycling or treating. [66273.83(d)(3)]
<input type="checkbox"/>	Failed to submit to DTSC documentation demonstrating financial responsibility for liability no later than 30 days prior to recycling or treating. [66273.83(d)(4)]
<input type="checkbox"/>	Failed to maintain on file the most recent notification and air permit (if required) and produce these records when requested. [66273.83(d)(5)]
<input type="checkbox"/>	Failed to prepare and submit an annual report to DTSC by February 1 of each calendar year. [66273.83(d)(6)]
<input type="checkbox"/>	Submitted an incomplete annual report. [66273.83(d)(6)]
<input type="checkbox"/>	Accepted any CRT material that is managed, or is required to be managed, as HW. [66273.83(d)(7)]
<input type="checkbox"/>	Conducted the treatment for the purpose of recycling one or more types of CRT glass and failed to reclaim the CRT glass at a CRT glass manufacturer or at a primary or secondary lead smelter. [66273.83(d)(8)]
<input checked="" type="checkbox"/>	Failed to ensure all treatment is conducted over or in a containment device sufficient in size and construction to contain any CRT glass that may be released. [66273.83(d)(9)]
<input type="checkbox"/>	Failed to utilize specified treatment methods. [66273.83(d)(10)]
<input type="checkbox"/>	Conducted treatment using chemicals or external heat other than specified in regulation. [66273.83(d)(11)]
<input type="checkbox"/>	Failed to ensure that the facility is operated in compliance with all applicable local and state air pollution control laws and regulations. [66273.83(d)(13)]
<input type="checkbox"/>	Failed to ensure that the facility is operated in compliance with all applicable worker health and safety laws and regulations. [66273.83(d)(14)]
<input type="checkbox"/>	Failed to ensure that all materials generated as a result of the treatment processes are properly classified and managed. [66273.83(d)(15)]
<input type="checkbox"/>	Failed to ensure that the activities conducted at the facility are consistent with local zoning or land use requirements. [66273.83(d)(16)]
<input type="checkbox"/>	Failed to maintain compliance with location standards and seismic and precipitation design standards requirements. [66273.83(d)(17)]

LABELING/MARKING	
<input type="checkbox"/>	Failed to properly label or clearly mark each container or pallet in or on which CRTs, CRT devices or CRT glass are contained. [66273.84]
<input type="checkbox"/>	Failed to properly label a designated area where CRTs and CRT devices are accumulated within demarcated boundaries. [66273.84)(d)]
<input type="checkbox"/>	Stored CRTs and CRT devices along with other materials in designated CRT accumulation areas. [66273.84)(d)]
ACCUMULATION TIME LIMITS	
<input type="checkbox"/>	Accumulated CRT material for more than one year from the date the universal waste (UW) is generated, or received from another handler. [66273.85(a)]
<input type="checkbox"/>	Failed to demonstrate the length of time that the UW has been accumulated from the date it became a waste or was received. [66273.85(b)]
EMPLOYEE TRAINING	
<input type="checkbox"/>	Failed to ensure that persons removing CRTs are thoroughly familiar with the techniques and safety precautions required to safely remove CRTs. [66273.83(b)(1)(C)]
<input type="checkbox"/>	Failed to ensure that all persons that perform treatment or recycling are thoroughly familiar with the associated hazards and have access to the proper procedures and protective equipment necessary to safely conduct the treatment. [66273.83(d)(12)]
<input type="checkbox"/>	Failed to inform all employees who handle or have responsibility for managing CRT material of the proper handling and emergency procedures. [66273.86(a)]
<input type="checkbox"/>	Employees who manage or handle waste CRT materials failed to receive specified initial training. [66273.86(b)]
<input type="checkbox"/>	Employees failed to take part in annual review of the initial training. [66273.86(c)]
RESPONSE TO RELEASES	
<input checked="" type="checkbox"/>	Failed to immediately contain all releases of CRT material and residues from CRT material. [66273.87(a)]
<input type="checkbox"/>	Failed to determine whether any material resulting from a release is a HW. [66273.87(b)]
<input type="checkbox"/>	Failed to manage any material determined to be HW as HW. [66273.87(b)]
<input type="checkbox"/>	Managed residues of leaking, broken, or damaged CRT material as UW without repackaging according to applicable standards. [66273.87(c)]

OFF-SITE SHIPMENTS	
<input type="checkbox"/>	Sent or took CRT material to a place other than another CRT MH, a destination facility, or a foreign destination. [66273.88(a)]
<input type="checkbox"/>	A CRT MH that transports CRT material off-site failed to comply with the UW transporter requirements. [66273.88(b)]
<input type="checkbox"/>	A CRT MH that offers CRT material that meets the definition of a hazardous material for off-site transportation failed to package, label, mark and placard the shipment according to applicable United States Department of Transportation (U.S DOT) regulations. [66273.88(c)]
<input type="checkbox"/>	The originating CRT MH failed to obtain an agreement from the receiving CRT MH prior to sending a shipment of CRT material. [66273.88(d)]
<input type="checkbox"/>	The originating CRT MH failed to follow rejected load procedures. [66273.88(e)]
<input type="checkbox"/>	The receiving CRT MH that rejects a shipment of CRT material failed to follow rejected load procedures. [66273.88(f)]
<input type="checkbox"/>	A CRT MH that receives a shipment of CRT material containing HW failed to notify DTSC of the shipment. [66273.88(g)]
<input type="checkbox"/>	A CRT MH that receives a shipment of non-hazardous, non-UW, failed to manage the waste in compliance with applicable federal, state, and local solid waste regulations. [66273.88(h)]
EXPORT	
<input type="checkbox"/>	Failed to notify DTSC four weeks before the intended initial shipment of CRT material to any foreign destination. [66273.90(a)]
<input type="checkbox"/>	Failed to notify CUPA of the intended export. [66273.90(a)]
<input type="checkbox"/>	Submitted an incomplete notification. [66273.90(b)]
<input type="checkbox"/>	Failed to notify the DTSC at least 60 days prior to export, the destination, contents, and volume of covered electronic waste (e-waste) to be exported to any foreign destination. [42476.5(a)]
<input type="checkbox"/>	Failed to demonstrate that the importation of covered e-waste is not prohibited by any applicable law or regulation of the country of destination and that any import is conducted in accordance with all applicable laws. [42476.5(b)]
<input type="checkbox"/>	Failed to forward required import and operating licenses to the DTSC. [42476.5(b)]

