



Shell Oil Company

P. O. Box 711
Martinez, California 94553
Telephone 228-6161

December 10, 1987

CERTIFIED MAIL

Mr. Dwight R. Hoenig, Chief
North Coast California Section
Toxic Substances Control Division
Department of Health Services
2151 Berkeley Way, Annex 7
Berkeley, CA 94704

Dear Mr. Hoenig,

In response to the Report of Violation received for Shell Oil Company's Martinez Manufacturing Complex (EPA ID No. CAD009164021) resulting from the May 13 and May 22, 1987 inspection, we submit the following.

Violation I.1.

"Drums in the drum storage area lacked a statement or statements which call attention to the particular hazardous properties of the waste."

The hazardous property of the material currently held in the hazardous waste drum storage area has been written on each of the drums. (Reference photograph I.1.1.) In the future, the hazardous property of the waste will be written on the drum label. (Reference drum label I.1.2.)

Violation I.2.

"The drum storage area, and the bulk waste storage area, lacked eyewashes and safety showers."

A portable self-contained eyewash and body spray will be installed by the drum storage area, the asbestos bin in the bulk waste storage area, and the Central Wet Box in the bulk waste storage area. (Reference Attachment I.) A portable eyewash and body spray unit was chosen over a permanent eyewash and safety shower installation for two reasons. First, permanent eyewashes and safety showers would be located at the dead end of water lines because the hazardous waste drum storage area and bulk waste storage area are in secluded areas. Therefore, the water in the

LAM 015916

DEMT-05049

lines will heat up during the summer months because of the lack of circulation. It has been Martinez's practice not to install permanent eyewashes and safety showers in such areas because of the safety aspects of using hot water for this type of safety equipment. Second, Martinez is developing a project to install a new waste management facility. When this project is finished the current hazardous waste drum storage area and bulk waste storage area will no longer be used. We are working towards completing construction by January 1, 1989. Therefore, we feel that the portable self-contained eyewash and body spray will meet the requirements of the regulations while the new area is designed and constructed. The self-contained eyewash and body spray units will be purchased and installed by January 22, 1988.

Violation I.3.

"The following hazardous waste management units lacked labels with the words "Hazardous Waste", as well as the composition and physical state of the waste, a statement or statements which call attention to the particular hazardous properties of the waste, the name and address of the person producing the waste, and the date upon which each period of accumulation begins:"

- a. A dropbox containing asbestos waste - A placard with the required information has been placed on the bin. (Reference photograph I.3.A-1 and I.3.A-2.)
- b. Drums that previously contained hazardous waste, located in the bulk waste storage area - Drums that are to be crushed and disposed of as hazardous waste will be accumulated in the hazardous waste drum storage area. Part of the hazardous waste drum storage area has been sectioned off with a chain for this use. Two sections were established; one to be used for drums which last contained a material classified as hazardous under federal regulations and the other to be used for drums which last contained a material classified as hazardous under state regulations. A placard with the required information will be hung on the chain for each section. (Reference photograph I.3.B-1 and I.3.B-2 and I.3.B-3.) The accumulation date on the placard will be the date that the first drum was placed in the area. All drums accumulated in the area will be crushed and disposed of at a Class I landfill within 90 days of the date on the placard.
- c. A waste transfer temporary storage bin, containing sulfur, lime, and oily trash - A placard with the required information has been placed on the bin. (Reference photograph I.3.C-1 and I.3.C-2.)
- d. The ASD filter cake temporary storage bins, containing 5% toluene and 95% inorganic filter cake - The ASD filter cake was sampled and analyzed in June 1987 to determine if the material

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could be declassified to a designated waste. Both Shell and Harding Lawson Associates, contracted by Acme Fill Corp. who was disposing the material, sampled and analyzed the material. (Harding Lawson Associates had Anatec Laboratories Inc., Curtis & Tompkins LTD., and Fireman's Fund Environmental Laboratory perform the analyses. We had Brown and Caldwell Laboratories perform the analyses.) It was determined that the material was not hazardous. The Regional Water Quality Control Board approved the material to be disposed at Acme Fill Corp. as a designated waste. Therefore, the ASD filter cake storage bins are no longer used for hazardous waste accumulation and do not require hazardous waste labels. The analyses of the material is included in Attachment II.

- e. The API Separator solids storage bins - A placard with the required information has been placed on the bins. (Reference photograph I.3.E-1 and I.3.E-2.)

Violation I.4.

"Tank No. 482 was not marked with the National Fire Prevention Association (NFPA) placard as required."

Upon reinspection of the tank by your staff during their inspection, an NFPA placard was indeed present on the tank. (Reference photograph I.4.1.)

Violation I.5.

"Inspection logs lacked the time of inspection and the date and nature of any repairs or other remedial actions."

Inspection logs in the hazardous waste facility areas have been revised to include the required information. (Reference Attachment III.)

Violation I.6.

"The Contingency Plan lacked a list of the names, addresses, and phone numbers of emergency coordinators."

The contingency plan has been revised to include the required information. (Reference Attachment IV. Please note that only the first 2 pages of the contingency plan are attached to show the addition of the emergency coordinator's name, address, and telephone number.)

Violation I.7.

"The following hazardous waste sites have been closed without submitting a closure plan to DHS at least 180 days before the date that closure is expected to begin..." (Tank 881 and 1068 are the

LAM 015918

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tanks referenced.)

During the inspection we discussed this issue with the inspectors. At that time we were unable to develop a resolution to this complex issue. We feel that further discussions with your staff will be necessary. We propose addressing this issue separately from the other violations and will initiate the discussions with your staff.

Violation I.8.

"Upon completion of closure, Shell has failed to submit to the Department certification both by themselves and by an independent qualified professional engineer registered in California, that the facilities listed in violation 7, have been closed in accordance with the specifications in the approved closure plan."

This violation will be handled in concert with Violation I.7.

Additional Information

As requested, listed below are the analyses for the centrifuge solids.

<u>METAL</u>	<u>CONCENTRATION</u>
Barium	800 - 1200 ppm
Chromium	1000 - 1400 ppm
Lead	100 - 300 ppm
Nickel	200 - 600 ppm
Zinc	1400 - 1800 ppm

If you have any questions in regard to this matter please contact Miriam Conner at (415) 228-6161, extension 3693.

Very truly yours,

Original Signed by J.C. Moorad

J. C. Moorad, Manager
Environmental Conservation
Martinez Manufacturing Complex

cc: William L. Brown - DHS
Charlene Williams - DHS

bc: J. H. Jacobs - H.O.
R. E. Bowen
ECD File 6.4, MFC File A.2.1.2

LAM 015919

DFMC-05052

Portable Stainless Steel Tank (10 gals)

Models 7602.10.2



Portable, Self-Contained Eye-Wash Unit for Hazardous Areas

Here is emergency first-aid in a stainless steel tank for flushing away harmful chemicals or foreign particles from the eyes, face and body. The unit aids in preventing serious (and often permanent) injury on locations remote from a water supply. Particularly useful for chemical fields, agricultural operations, construction job sites, petroleum installations — virtually any activity involving risk of eye or skin damage from chemical burns or foreign substances where water is normally not available. Heads are covered with plastic caps that remove when water is turned on.

Model 7602.10.2 (Combination Eye-Wash and Face and Body Spray)

Heads: twin Buna N covered ABS plastic patented Soft-Flo® heads angled to direct streams of cleansing water into eyes.

Valve: push-type brass ball valve that stays open until manually closed.

Stream Control: steady water flow assured with Haws® dependable dual automatic pressure compensation devices.

Hand spray: eye/face and body spray with exclusive Feather-Flo™ spray head operated with squeeze lever, handle valve and mounted on 8' heavy duty rubber hose.

Tank: 10 gallon capacity with 8 gallons of usable water. .042" stainless steel tank with carrying handle. Air pressure filled through tire type valve to recommended 100 PSIG.

Pressure gauge; safety relief valve (set at 120 PSIG) and tire-type valve are mounted on the tank. Additional relief valve built into tank cover, factory set in 100-130 PSIG range with manual override lever.

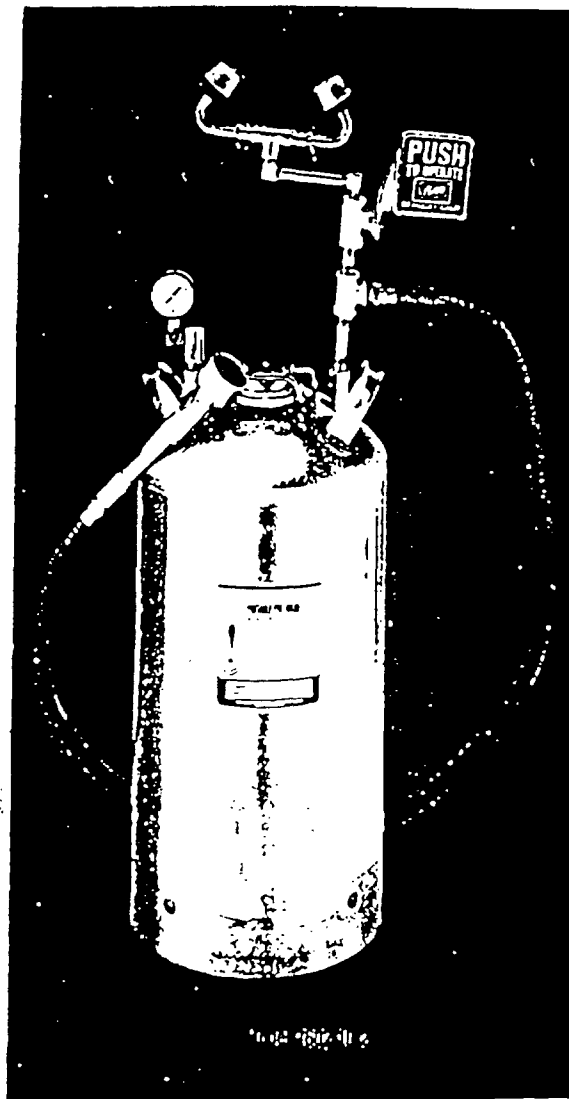
Measurements: overall height, 43"; diameter, 12 1/2"

Shipping weight: approx. 37 lbs.

ALL EMERGENCY EQUIPMENT SHOULD BE TESTED WEEKLY

Specifications subject to change without notice

Pat. Nos. 3,609,755; 3,622,052; 3,602,436



This unit will supply approximately 8 minutes of continuous flow of water from the eye-wash or one minute 30 seconds of water from the hose spray. It is meant to provide emergency relief only to victim prior to being transferred to a first aid station or medical facility.

LAM 015920



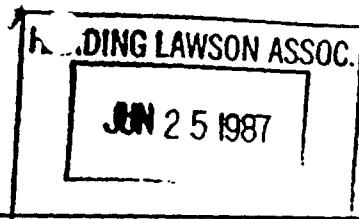
EMERGENCY EQUIPMENT

HAWS DRINKING FOUNTAIN COMPANY
GENERAL OFFICE
P.O. Box 1999, Berkeley, California
Telephone 415/863-1000
ABLE - HAWK - 1111

DPMC-05053



ATTACHMENT II



435 Tesconi Circle

Santa Rosa, California 95401

707-526-7200

Philip Crispell
Harding Lawson Associates
200 Rush Landing Rd.
PO Box 6107
Novato, CA 94947

June 23, 1987
ANATEC Log No: 9485 (-1).
Series No: 281/057
Client Ref: 5829,003.02

Subject: URGENT Priority Analytical Results for One Sample
Identified as "Shell Filter Cake" Received on
June 9, 1987.

Dear Mr. Crispell:

Analysis of the sample referenced above has been completed. This report serves as written confirmation of results transmitted verbally on June 15 and June 16, 1987.

The sample was analyzed for benzene, toluene and xylenes. The "total" concentration of several metals was also measured. As discussed, the sample was to receive analysis for "Waste Extraction Test (WET)-soluble" inorganics as referenced in Title 22, Article 11, Section 66699 of the California Administrative Code if any of the "total" metal concentrations exceeded the ⁵TTLC (Total Soluble Threshold Limit Concentrations) values listed in the California Administrative Code (ibid). Since none of the results exceeded the TTLC, the WET-extraction and analysis was not performed.

The sample was prepared for volatile aromatic (benzene, toluene and xylenes) measurements by weighing portions of sample into vials which were later sealed with septa and crimp caps. Each vial was heated for one hour at 90°C during which time light hydrocarbons were expected to equilibrate in distribution between sample and headspace. Headspace gases were then analyzed by gas chromatography and compared to standards prepared with reagent-grade benzene, toluene and xylenes.

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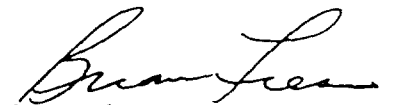
Details of the analytical methodology are consistent with requirements specified in "Guidelines for Addressing Fuel Leaks," revised February, 1986, Regional Water Quality Control Board, San Francisco Bay Region; the preparation procedure used is described in "Headspace Method," Method 5020 for gasoline in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," U.S. EPA SW-846, 2nd edition, revised 1984.

To measure "total" concentrations of the inorganics, a portion of the sample was digested with appropriate mineral acids, diluted with reagent water and analyzed using the atomic spectroscopic techniques referenced in Table 1. Table 2 contains summarized results and the applicable TTLC values.

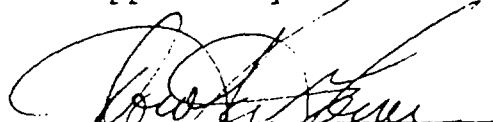
Various quality control samples were analyzed with the samples, including blank, replicate, external standards, method standards and analyte-fortified sample spikes. Results of the quality control analyses are not included in this report, but are available upon request.

Should you have any questions regarding procedures or results, please call.

Submitted by:


Brian Fies
Atomic Spectroscopist

Approved by:


Dorothy Gower
Project Manager

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DPMC-05055



TABLE 1. ANALYTICAL METHODS

<u>Parameter</u>	<u>Analytical Technique¹</u>	<u>EPA Method No.²</u>
<u>Atomic Spectroscopic Methods</u>		
Antimony	ICPAES	6010
Arsenic	AAS-HGA	7060
Barium	ICPAES	6010
Beryllium	ICPAES	6010
Cadmium	ICPAES	6010
Chromium (total)	ICPAES	6010
Chromium (hexavalent)	AAS-Flame	7197
Cobalt	ICPAES	6010
Copper	ICPAES	6010
Lead	ICPAES	6010
Mercury	AAS-CV	7470
Molybdenum	ICPAES	6010
Nickel	ICPAES	6010
Selenium	AAS-HGA	7740
Silver	ICPAES	6010
Thallium	ICPAES	6010
Vanadium	ICPAES	6010
Zinc	ICPAES	6010
<u>Organic Chemistry Methods</u>		
Benzene, toluene & xylenes	Headspace method/ gas chromatography	5020

¹Atomic spectroscopic technique:

AAS --Atomic absorption spectroscopy

HGA --Heated graphite atomization

Flame --Flame atomization

CV --Cold vapor generation

ICPAES--Inductively coupled argon plasma atomic emission spectroscopy

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²"Test Methods for Evaluating Solid Waste," U.S. EPA SW-846, Volumes 1A-C: Laboratory Manual Physical/Chemical Methods, Third Edition, November 1986.

TABLE 2. SUMMARIZED RESULTS FOR "SHELL FILTER CAKE"
(ANATEC LAB NO. 9485-1)

Parameter	Regulatory Criteria ¹	Results
	TTL ² (mg/Kg)	Total ² (mg/Kg)
Antimony, & compounds	500	<20
Arsenic, & compounds	500	0.7
Barium, & compounds ³	10,000	4.2
Beryllium, & compounds	75	<0.5
Cadmium, & compounds	100	<0.5
Chromium (VI), & compounds	500	NA ⁴
Chromium, & compounds	2,500	6.2
Cobalt, & compounds	8,000	<1
Copper, & compounds	2,500	1.9
Lead, & compounds	1,000	<10
Mercury, & compounds	20	<0.05
Molybdenum, & compounds	3,500	<1
Nickel, & compounds	2,000	3.8
Selenium, & compounds	100	<0.2
Silver, & compounds	500	<1
Thallium, & compounds	700	<10
Vanadium, & compounds	2,400	3.4
Zinc, & compounds	5,000	8.0
Benzene	--	ND ⁵
Toluene	--	ND
Xylene	--	60

¹TTL--Total Threshold Limit Concentrations²mg/Kg--Data are expressed in units of milligrams analyte per kilogram sample, as-received basis.³Excludes barium sulfate.⁴NA--Not analyzed; value for "total" chromium fell below regulatory limit for hexavalent chromium.⁵ND--Not detected.

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DPMC-05057

LAB NUMBER: 12758-3
 CLIENT: HARDING LAWSON ASSOC.
 SAMPLE ID: Shell-Filter Cake
 JOB NO. 5829,003.02
 LOCATION: Acme, Martinez

DATE RECEIVED: 5/19/87
 DATE REPORTED: 6/2/87

CAM 17 METALS BY ICP SPECTROMETRY: EPA 6010 IN SOIL & WASTES
 DIGESTION METHOD: EPA 3010

METAL	CONC (mg/kg)	DETECTION LIMIT (mg/Kg)
Arsenic	ND	20
Antimony	ND	20
Barium	ND	20
Beryllium	ND	20
Cadmium	ND	2
Chromium (total)	ND	2
Cobalt	ND	20
Copper	ND	2
Lead	ND	20
Mercury	ND	0.02
Molybdenum	ND	20
Nickel	ND	2
Selenium	ND	20
Silver	ND	2
Thallium	ND	20
Vanadium	ND	20
Zinc	ND	2

=====

QA - QC SUMMARY

	%RPD	%SPIKE		%RPD	%SPIKE
Arsenic	<1	102	Beryllium	<1	92
Selenium	<1	93	Thallium	<1	104
Antimony	<1	106	Copper	12.5	108
Zinc	13.2	114	Chromium	11.4	108
Lead	3	106	Moly	25	92
Cadmium	<1	112	Silver	<1	105
Nickel	8.7	115	Mercury	11.4	89
Barium	3.3	106	Cobalt	<1	64
Vanadium	2	120			

ND = NONE DETECTED. mg/Kg = parts per million.

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**FIREMAN'S FUND
INSURANCE COMPANIES**

Environmental Laboratory
3700 Lakeville Highway
Petaluma, CA 94952
(707) 778-4160

ENVIRONMENTAL LABORATORY

HARDING LAWSON ASSOC.

JUN 22 1987

Phillip Crispell
Harding Lawson
7655 Redwood Blvd.
Novato, CA 94947

Page 1

L A B O R A T O R Y R E S U L T S

Supply/Order No.: *SHELL FILTER CAKE*
Client's Survey No.: ACME LANDFILL
Contract/PO No.: NO CONTRACT NUMBER
Release No.: 5829,003,02

Laboratory Job No.: 871785
Date Received: 06/10/87
Date Reported: 06/18/87
Client Code: HARD5

MERCURY (AA FLAMELESS EPA 7470), 3010 ACID DIGEST

MATRIX: WASTE, CA EXTRACT

LABNO SMPLNO	COMPOUND	FOUND MG/LT	CA STLC MG/LT	DET. LIM. MG/LT
11339 5829,003,02	HG	0.00024	0.20000	0.00020

ANALYST: PRECY ROBINSON

LAM 015926

APPROVED BY
JERRY TUMA, PH.D., CIH
DIRECTOR, ENVIRONMENTAL LABORATORY

DEMC-05059

et



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Environmental Laboratory
3700 Lakeville Highway
Petaluma, CA 94952
(707) 778-4160

ENVIRONMENTAL LABORATORY

Page 2

LABORATORY RESULTS

Laboratory Job No.: 871785

ASSAY:METAL SCAN BY ICP(EPA 6010)
FILTER CAKE

LABNO	SMPLNO-ID	RESULTS		DET. LIM.
-----	-----	-----		-----
11339	5829,003,02	WASTE	CA TTLC	
	AG	<0.20 MG/KG	500.000	0.20
	AS	<2.0 MG/KG	500.000	2.0
	BA	DETECTED MG/KG	10000.000	0.40
	BE	<0.40 MG/KG	75.000	0.40
	CD	<0.40 MG/KG	100.000	0.40
	CO	<0.40 MG/KG	8000.000	0.40
	CR	DETECTED MG/KG	2500.000	0.40
	CU	DETECTED MG/KG	2500.000	0.40
	FE	248.63 MG/KG		0.40
	HG	DETECTED MG/KG	20.000	0.8
	MN	3.94 MG/KG		0.40
	MO	<0.40 MG/KG	3500.000	0.40
	NI	DETECTED MG/KG	2000.000	0.40
	PB	<0.8 MG/KG	1000.000	0.8
	SB	<2.0 MG/KG	500.000	2.0
	SE	<2.0 MG/KG	100.000	2.0
	SN	<0.8 MG/KG		0.8
	TL	<4.0 MG/KG	700.000	4.0
	V	DETECTED MG/KG	2400.000	0.40
	ZN	1.44 MG/KG	5000.000	0.40

DETECTED=DETECTED BUT NOT QUANTITATED
QUANTITATION LIMIT=3.3- DETECTION LIMIT.
ANALYST:PRECY ROBINSON

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DFMC-05080



FIREMAN'S FUND
INSURANCE COMPANIES
Environmental Laboratory
3700 Lakeville Highway
Petaluma, CA 94952
(707) 778-4160

ENVIRONMENTAL LABORATORY

LABORATORY RESULTS

Page 3

Laboratory Job No.: 871785

ASSAY: SOLVENTS IN SOIL/WASTE BY HEADSPACE(GC/FID)
MATRIX: SOIL

LABNO SMPLNO-ID	RESULTS
-----	-----
11339 5829,003,02	
BENZENE	0.698 UG/GM
TOLUENE	0.120 UG/GM
XYLENE	54.903 UG/GM

ANALYST: JOHN T. BYCHOWSKI

LAM 015928

DPMC-05061



BROWN AND CALDWELL LABORATORIES

1255 POWELL STREET EMERYVILLE, CA 94608 • (415) 428-2300

ANALYTICAL REPORT

LOG NO: E87-06-204

Received: 09 JUN 87

Reported: 30 JUN 87

Mr. Ed Salvador
Shell Oil Co., Environmental Lab
P.O. Box 711
Martinez, California 94553

Purchase Order: MR 99743-DK

REPORT OF ANALYTICAL RESULTS

Page 1

LOG NO	SAMPLE DESCRIPTION, EP LEACH SAMPLES	DATE SAMPLED
06-204-1	ASD Filter Cake	JUNE 4 1987
PARAMETER	06-204-1	
EPA, EP TOX Extraction	06.15.87	
Arsenic, mg/L	0.02	
Barium, mg/L	<0.1	
Cadmium, mg/L	<0.01	
Chromium, mg/L	0.10	
Lead, mg/L	<0.1	
Mercury, mg/L	<0.0002	
Selenium, mg/L	<0.01	
Silver, mg/L	<0.01	

LAM 015929

DPMC-05082



BROWN AND CALDWELL LABORATORIES

1255 POWELL STREET EMERYVILLE, CA 94608 • (415) 428-2300

ANALYTICAL REPORT

LOG NO: E87-06-204

Received: 09 JUN 87

Reported: 30 JUN 87

Mr. Ed Salvador
Shell Oil Co., Environmental Lab
P.O. Box 711
Martinez, California 94553

Purchase Order: MR 99743-DK

REPORT OF ANALYTICAL RESULTS

Page 2

LOG NO	SAMPLE DESCRIPTION, CALIF WASTE EXTRACT SAMPLES	DATE SAMPLED
06-204-2	ASD Filter Cake	
PARAMETER	06-204-2	
Antimony, mg/L	<0.1	
Arsenic, mg/L	0.07	
Barium, mg/L	<0.1	
Beryllium, mg/L	<0.01	
Cadmium, mg/L	<0.01	
Chromium, mg/L	0.14	
Cobalt, mg/L	<0.05	
Copper, mg/L	0.18	
Lead, mg/L	0.1	
Mercury, mg/L	<0.001	
Molybdenum, mg/L	<0.1	
Nickel, mg/L	0.13	
Selenium, mg/L	<0.01	
Silver, mg/L	0.04	
Thallium, mg/L	<0.1	
Vanadium, mg/L	<0.2	
Zinc, mg/L	<0.01	
CAM WET Extraction	06.15.87	

LAM 015930

DFMC-05083



BROWN AND CALDWELL LABORATORIES

1255 POWELL STREET EMERYVILLE, CA 94608 • (415) 428-2300

ANALYTICAL REPORT

LOG NO: E87-06-204

Received: 09 JUN 87

Reported: 30 JUN 87

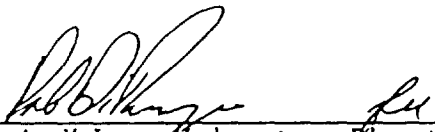
Mr. Ed Salvador
Shell Oil Co., Environmental Lab
P.O. Box 711
Martinez, California 94553

Purchase Order: MR 99743-DK

REPORT OF ANALYTICAL RESULTS

Page 3

LOG NO	SAMPLE DESCRIPTION, SLUDGE SAMPLES	DATE SAMPLED
06-204-3	ASD Filter Cake	
PARAMETER	06-204-3	
EPA Method 8020		
Date Extracted	06.24.87	
1,2-Dichlorobenzene, mg/kg	<0.5	
1,3-Dichlorobenzene, mg/kg	<0.5	
1,4-Dichlorobenzene, mg/kg	<0.5	
Chlorobenzene, mg/kg	<0.5	
Benzene, mg/kg	1.0	
Ethylbenzene, mg/kg	47	
Toluene, mg/kg	3.2	
Total Xylene Isomers, mg/kg	210	


D. A. McLean, Laboratory Director

LAM 015931

DPMC-05064

Guidelines for Checking Safety Equipment List No. 2

1. Visually observe all fire extinguishers and fire blanket boxes. Record any defects found in the "Defects Found" column; i.e., broken seal, missing inspection card, fire blanket missing. Record any corrections made in the "How Corrected" column; i.e., replaced broken seal, replaced fire extinguisher, replaced fire blanket.
2. Visually observe all steam hoses and lances. Hose should be in good condition and lance attached, and hose rolled up. Record any defects found in the "Defects Found" column; i.e., steam hose has a tear, steam lance missing. Record any corrections made in the "How Corrected" column; i.e., replaced steam hose, replaced steam lance.
3. Test all emergency showers and eye baths by turning them on. Record any defects found in the "Defects Found" column and any corrections made in the "How Corrected" column.
4. If a piece of safety equipment is found defective and cannot be corrected by you, initiate a work request ticket and write in the ticket number and WRI in the "How Corrected" column.
5. If a piece of safety equipment is not defective, write in "No Defects" in both the "Defects Found" column and the "How Corrected" column.
6. The Operator completing the Safety Equipment List No. 2 is required to sign the Process Operator slot at the bottom of each sheet and enter the date and time of the inspection in the "Date/Time Inspected" column for each piece of safety equipment. There will be no "ditto", "check" marks, or blank spaces in the "Defects Found" "Date/Time Inspected", and "How Corrected" columns.
7. The Operations Foreman will sign and date each Safety Equipment Check List No. 2 sheet.
8. The Safety Equipment Check List No. 2, and any work requests that were initiated because of a defect, will be routed to the EM&SR Training Coordinator.

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DFMC-05065

UTILITIES PLANT OPERATING PROCEDURES NO. 6

SAFETY EQUIPMENT CHECK LIST NO. 2

LOCATION	EQUIPMENT	DEFECTS FOUND	DATE/TIME INSPECTED	HOW CORRECTED	DATE CORRECTED	OPER INIT
EAST OF TK. 383	130# ANSUL FIRE EXTINGUISHER					
WEST OF COB #2 AT GRADE	SAFETY SHOWER & EYE BATH	1				
BETWEEN COB #2 & #3 ON HOPPER DECK	SAFETY SHOWER & EYE BATH					
NE CORNER COB #1	STEAM HOSE AND LANCE					
NE CORNER COB #1	FIRE BLANKET					
NW CORNER COB #1	130# ANSUL FIRE EXTINGUISHER					
NE CORNER COB #2	FIRE BLANKET					
NE CORNER COB #2	130# ANSUL FIRE EXTINGUISHER					
NE CORNER COB #2	STEAM HOSE AND LANCE					
SE CORNER COB #2	STEAM HOSE AND LANCE					
BETWEEN COB #2 AND #3	STEAM HOSE AND LANCE					
NW CORNER COB #3	130# ANSUL FIRE EXTINGUISHER					

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DPMC-05066

PROCESS OPERATOR: _____

OPERATIONS FOREMAN
DATE: _____

UTILITIES PLANT OPERATING PROCEDURES NO. 6

SAFETY EQUIPMENT CHECK LIST NO. 2

LOCATION	EQUIPMENT	DEFECTS FOUND	DATE/TIME INSPECTED	HOW CORRECTED	DATE CORRECTED	QPER INIT
NW CORNER COB #3	FIRE BLANKET					
NW CORNER COB #3	STEAM HOSE AND LANCE					
SW OF COB #3	STEAM HOSE AND LANCE					
CONVEYOR PLATFORM OFF OF COB #1 STAIRWAY	CO2 FIRE EXTINGUISHER					
CONVEYOR PLATFORM OFF COB #2 & #3 STAIRWAY	CO2 FIRE EXTINGUISHER					
SOUTH END COB #3 STEAM DRUM	STEAM HOSE AND LANCE					
WEST SIDE COB #2 STEAM DRUM	STEAM HOSE AND LANCE					

LAM 015934

DPMC-05067

PROCESS OPERATOR:

OPERATIONS FOREMAN:
DATE:

ATTACHMENT IV

X. CONTINGENCY PLAN

The Federal Resource Conservation and Recovery Act (RCRA) and the California Department of Health Services require that companies storing, treating or disposing of hazardous wastes have a written contingency plan designed to minimize hazards to human health and the environment in the event of:

- (1) Fires
- (2) Explosions
- (3) Any unplanned, or non sudden, release of hazardous waste into
air, soil, or surface water.

Since there is no fundamental differences in the hazard characteristics of the hazardous wastes stored/treated and the hazardous materials found elsewhere in the Complex, emergencies in the hazardous waste areas are handled like emergencies anywhere else in the Complex.

Specific procedures for response to, and control of, any emergency are contained in the Shell Oil Emergency Manual. This manual forms the basis of our emergency and contingency procedures and is updated semi-annually.

Shell's Oil Spill Contingency Plan, Spill Prevention Control and Countermeasure Plan and the Environmental Procedures Manuals also contain information relevant to controlling emergencies.

Copies of these manuals and procedures are not included, however, they are available in the Environmental Conservation Department for inspection by the U.S. Environmental Protection Agency, and the California Department of Health Services.

LAM 015935

Refinery personnel are required to be familiar with and specifically trained in the procedures specified in these documents as is relevant to their job assignments.

A description of the "key" features in our contingency plan follows.

Emergency Procedures:

The emergency response procedures are as follows:

- 1) An alarm may be turned in from any phone by calling the officer on duty at the Complex Security Communications Center.
- 2) The Security Officer will activate the Complex alarm system and page emergency response teams. The following will respond:
 - a) Members of the Basic Fire Crew on duty at the Complex
 - b) Auxiliary Fire Crew
 - c) Operating personnel of area involved
 - d) Health and Safety Response Team
 - e) Emergency Response Team of area involved
 - f) Community Relations/Environmental Response Team
 - g) Departmental Duty Personnel
 - h) Complex Duty Person

Emergency Coordinator:

The Manager Health and Safety Department has been designated as Emergency Coordinator for the Complex. He or his delegate are either on duty at the Complex, or on call at any time.

Coordinator: A.C.(Arnie) Dreier	215 St. Germain Lane Pleasant Hill, CA 94523	(415)827-2763
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Alternate: J.(John) Ryan	1386 Lupine Ct. Concord, CA 94521	(415)827-2587
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LAM 015936

I.1.2

HAZARDOUS WASTE

STATE AND FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE, OR PUBLIC SAFETY AUTHORITY, OR THE
U.S. ENVIRONMENTAL PROTECTION AGENCY, OR THE
CALIFORNIA DEPARTMENT OF HEALTH SERVICES.

PROPER U.S. DOT
DESCRIPTION HAZARDOUS WASTE SOLID, N.O.S., ORM-E, NA9189 (K051) (RQ)

HAZARDOUS PROPERTIES/DESCRIPTION: TOXIC. API SEPARATOR SOLIDS 95-100%,
PETROLEUM OIL 0-5%.

GENERATOR INFORMATION:

NAME SHELL OIL COMPANY
ADDRESS P.O. BOX 711
CITY MARTINEZ STATE CA ZIP 94553

EPA ID NO. CAD009164021 EPA WASTE NO.(S): K051 STATE WASTE CODE: 181

ACCUMULATION START DATE 01/01/87 STATE MANIFEST DOCUMENT NO. 00000001

HANDLE WITH CARE!
CONTAINS HAZARDOUS OR TOXIC WASTES

LAM 015937

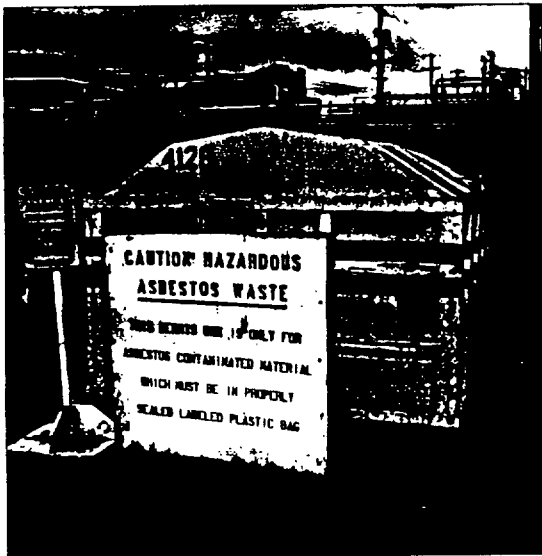
DFMC-05070



I.1.1.

12/11/87

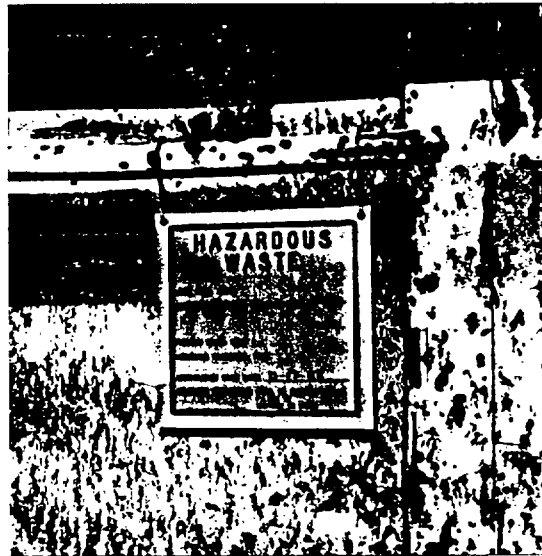
HAZARDOUS WASTE DRUMS



I.3.A-1

12/9/87

ASBESTOS BIN



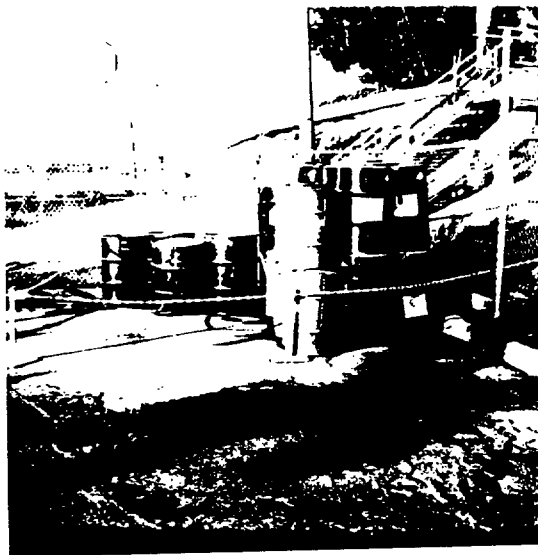
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12/9/87

ASBESTOS BIN

LAM 015938

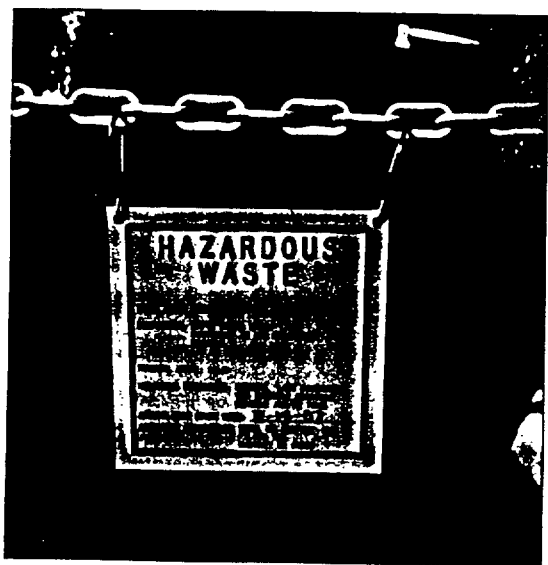
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I.3.B-1

12/9/87

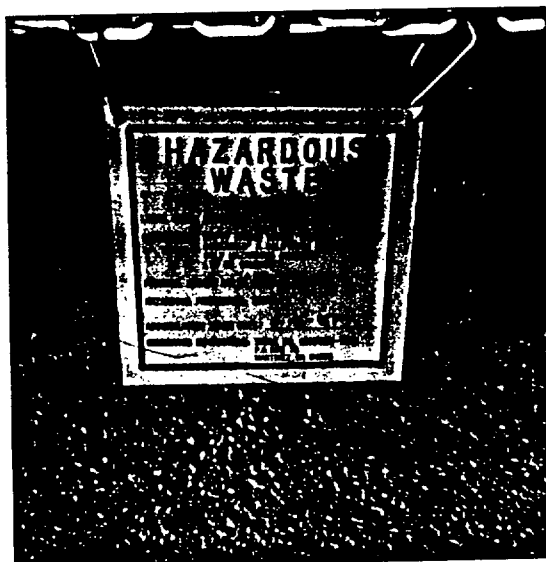
EMPTY DRUM



I.3.B-2

12/9/87

EMPTY DRUMS



I.3.B-3

12/9/87

EMPTY DRUMS

LAM 015939

DFMC-05072



LAM 015940

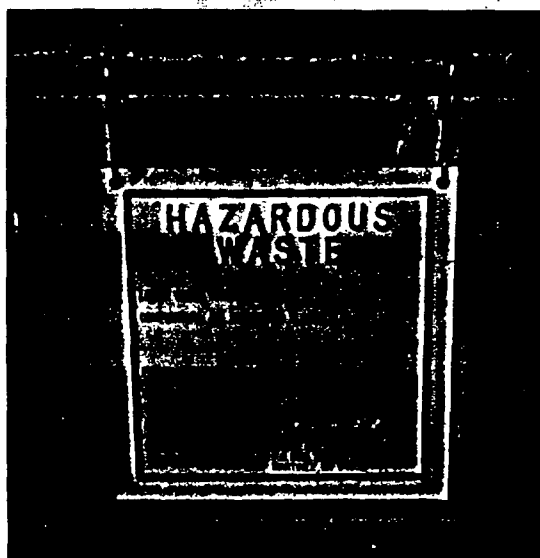
DPMC-05073



I.3.E-1

12/9/87

API SEPARATOR SOLIDS



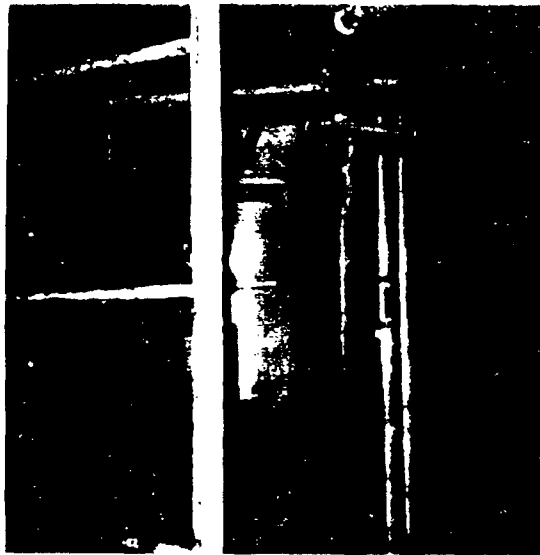
I.3.E-2

12/9/87

API SEPARATOR SOLIDS

LAM 015941

DPMC-05074



I.A.1

12/7/87

TANK 482

LAM 015942

DPMC-05075

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Technical Correspondence
1987

LAM 015915

DPMC 05048.1