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April 27, 2018

Via Electronic & U.S. Mails

Adrianna M. Crawl, Esq.
(waterqualitypetitions@waterboards.ca.gov)
Office of Chief Counsel
STATE WATER RESOURCE CONTROL BOARD
P.O. Box 100
Sacramento, California 95812

Re: **Requirements for Technical Reports Pursuant to California Water Code
Section 13267 Order dated March 30, 2018**

**Coldwater Cleaners, 4360 Coldwater Canyon Avenue, Studio City, California
91604 (SCP No. 1417)**

Dear Ms. Crawl:

Pursuant to Water Code § 13320 and Title 23 of California Code of Regulations §§ 2050-68, Coldwater Cleaners is writing to urge you to remove Coldwater Cleaners from California Water Code § 13267 Order No. R4-2018-0033 (“Order”), requiring it to submit a work plan to assess the indoor air quality inside the commercial building at 4360 Coldwater Canyon Avenue in Studio City, California, and to vertically delineate any volatile organic compounds (“VOC”) in the subsurface soil, soil vapor, or groundwater. *See* Exhibit A. Coldwater Cleaners also urgently requests a stay on the Regional Water Board’s Order, pending review of this petition by the State Water Board.¹ *See* Exhibit B.

Before Coldwater Cleaners explains, however, the reasons why it should be removed from the Order, Coldwater Cleaners would like to correct some of the erroneous factual findings or assumptions made in the Order. Among these, one of the most important corrections Coldwater

¹ Coldwater Cleaners first received notice of the Order on or about April 5, 2018. Because petitions must be received by the State Water Board within 30 days of the Order, Coldwater Cleaners did not have an opportunity to raise in writing to the Regional Water Board the issues addressed herein before filing a petition.

Cleaners has to offer is to the Regional Water Board's assertion in paragraph 4.0 that ". . . Coldwater Cleaners . . . operates the activity that resulted in the discharge of waste." This letter will demonstrate that:

- The Regional Water Board's understanding of the location and impact of the dry cleaners and Shell Gas Station is incomplete. The dry cleaners now in question, located at 4362 Coldwater Canyon Avenue in Studio City, used to be situated on an adjacent parcel, located at 12854 Moorpark Street, Studio City, which is currently MGS Dental Office of Studio City. The original dry cleaners, which was on record from approximately 1933 until 1975, was located at 12854 Moorpark Street, Studio City, until approximately 1975, when the development split. The original dry cleaners on the site was at a different location from that of Coldwater Cleaners. Coldwater Cleaners, however, is now on the site of the old Shell facility.
- The Regional Water Board's understanding of the timeline of operations on the current site is also incomplete. Coldwater Cleaners has not been in operation since 1966, nor has Anna Zenjiryman owned and operated the dry cleaners since 1966. Coldwater Cleaners has been in existence since 2012. Prior to that, the dry cleaners on the site was called Colfax Cleaners. Anna Zenjiryman purchased Colfax Cleaners from Adriana Diona in approximately 1995. The previous owner-operator, Adriana Diona, owned the dry cleaners from approximately 1978 to 1995, when she sold it to Anna Zenjiryman. Thus, the dry cleaners has been operated by Anna Zenjiryman since approximately 1995. Coldwater Cleaners is neither familiar with nor liable for the ownership of the dry cleaners prior to that time; however, the owner prior to Adriana Diona, whose identity is unknown, also owned another dry cleaning business on Colfax and Moorpark, and the dry cleaners was his second location. It is therefore necessary for the Regional Water Board to show – even if Coldwater Cleaners could be responsible for the levels of VOCs, which it cannot, as shown below – how long it took those compounds to reach the various levels of soil and groundwater that it is measuring.
- The Order mentions Equilon Enterprises LLC, dba Shell Oil, but fails to mention what actions the Regional Water Board is taking in regards to Shell Oil's operation of a gas station or performance of other activities on the premises for over twenty years. Gas stations are sufficiently toxic that their continuous operation on a single site has been enough to have that site designated a Superfund site. Coldwater Cleaners therefore asks that the Regional Water Board apprise it of the Regional Water Board's approaches to the responsible parties, with a particular emphasis on how the Regional Water Board will determine that, in the over twenty year period for which Shell operated on the site, no single operation performed over that period, including but definitely not limited to, their storage and sale of toxic pollutants contributed to the VOC levels. If the Regional Water Board is unable to demonstrate that Shell was not responsible, then there is no reason to impute that

responsibility to Coldwater Cleaners, nor to any dry cleaner operating on the premises.

- Conversely, there is ample evidence that Shell *is* responsible for VOC levels and that they should be ordered accordingly. For example, VOC can be created from repair shops of gas stations, including auto mechanics' premises. The current location of the dry cleaners was the site of the service and repair facility of the old gas station before it burned down. This can be proven by recourse to the Los Angeles Departments of Planning and Building and Safety. As a part of their infrastructure, they kept a huge oil tank, which is in all likelihood the source of the current VOC contamination. A simple internet search would have yielded the Regional Water Board this information.
- Air quality in the business has never been an issue. South Coast Air Quality Management District, which is the air pollution control agency for all of Orange County and the urban portions of Los Angeles, Riverside and San Bernardino counties, requires dry cleaners like Coldwater Cleaners (those using perc) to comply with SCAQMD Rule 1421 and the federal National Emission Standard for Hazardous Air Pollutants (NESHAP) and the state Airborne Toxic Control Measure (ATCM) for Emissions of Perchloroethylene from Dry Cleaning Operations (17 California Code of Regulations 93109, *et seq.*). South Coast Air Quality Management District has routinely inspected and renewed Coldwater Cleaners' permit to conduct its dry cleaning business because of its good operating practices with its perc dry cleaning machine. South Coast Air Quality Management District imposes on the dry cleaning business operation and maintenance requirements, leak check and repair requirements, environmental training requirements, reporting requirements (*e.g.*, pounds of clothes cleaned, gallons of solvent purchased, gallons of solvent used, number and type of filter cartridges disposed, and copies of all waste manifests) and recordkeeping (*e.g.*, logs showing the date and the pounds of materials cleaned per load, purchase and delivery receipts for perchloroethylene, records of receipts) and testing. South Coast Air Quality Management District also collects emission data from dry cleaners within the region, identifies facilities having localized impacts, to ascertain health risks, to notify nearby residents of significant risks, and to reduce those significant risks to acceptable levels. *See* Exhibit C.

Most importantly of all, it is crucial that you understand that, notwithstanding all of the above, it is actually impossible that for Coldwater Cleaners to have caused or created the discharge of the waste for which the Regional Water Board attempts to hold Coldwater Cleaners responsible. The Order asks in paragraph 6.0 that Coldwater Cleaners "adequately determine the extent of discharges of waste at ... the site." Coldwater Cleaners' discharge of waste at the site is nil.

Less than a year after purchasing the dry cleaning business in 1995, Coldwater Cleaners purchased a new dry cleaning machine – the R-Series Lindus.² Since purchasing the machine, Coldwater Cleaners has always maintained it, avoided risks during machine operation and from the solvents, and safeguarded the operator and environment. Since the day it was purchased, the machine has always had a floor safety tank on the bottom so that it can contain any solvent leaks, thereby safeguarding the surrounding environment, in the event of a spill or leak, which has never happened since the dry cleaners has been in existence. *See* Exhibit D.

This is not to say that all dry-cleaning machines are created equal; indeed, that is why Coldwater Cleaners purchased the R-Series Lindus in particular. This safety tank was not in the previous machine, and moreover this machine was installed on the floor, thereby creating a possibility of a spill. In terms of removal of “perc” or any hazardous materials, Coldwater Cleaners has always made use of a third party environment services company to handle the use and disposal. Specifically, Coldwater Cleaners has been with Veolia Environmental Services since approximately 2008. *See* Exhibit E. Prior to that, Coldwater Cleaners used Safety Kleen, Inc. Owing to its use of a third party, Coldwater Cleaners is able to demonstrate a strict chain of custody of *all* pollutants used on the premises and thereby demonstrate conclusively that *none* of the pollutants observed in Shell’s testing are the responsibility of Coldwater Cleaners. Although businesses are not required to keep records of this sort beyond four years, Coldwater Cleaners has maintained its records going back to 2008.

The process of disposing of the perc has always been the same since purchasing the drying cleaning business. Coldwater Cleaners disposes of the “cooked perc” and filters by placing them in barrels, and these too are placed on floor safety tanks to safeguard the environment. *See* Exhibit F. Once the barrels are full, Coldwater Cleaners calls Veolia to the dry cleaners who then removes the barrels from the premises, replacing them with empty barrels. Veolia also transfers the new perc into the dry cleaning machine. Coldwater Cleaners never handles the perc.

The table on page 2, in paragraph 3.0, states that the Regional Water Board is listing the “maximum” detected concentrations since testing began. The maximum concentrations, however, range in age from six to twelve years. Therefore, the current concentrations are lower, because you have not used any measurements taken more recently than 2012. Even if Coldwater Cleaners could be held responsible for VOC level on the site, which it categorically cannot, it would be necessary for the Regional Water Board to supply current measurements of pollutants *and* to derive

² LINDUS established in Parma in 1976, is a renowned producer of dry cleaning machines. The skill and entrepreneurship of its founders allowed an immediate success in very demanding markets the world over, particularly in USA, Japan and Canada. On September 20, 2010, LINDUS move to Parma, due to the acquisition from Bergparma s.r.l. LINDUS production has always been known as a synonym for quality, reliability and innovation. Its range of machines complies with the strictest technological standards. Focal points of its production are respect for the environment, reduced consumption, reduced maintenance, flexibility of application and an original look. Advanced management techniques enable Bergparma s.r.l. to provide technical assistance and spare parts even for machines that were phased out of production several years ago. LINDUS, models, today entered in BERGPARGMA company, not only represents a milestone in the Italian history entrepreneurship, but also a brand renowned the world over for quality, efficiency and reliability.

from them a fresh set of cancer risk calculations. Moreover, there is a logical inconsistency in seeking to hold a party responsible for polluting groundwater at a site on which, as the Regional Water Board states on page three in paragraph 3.1, “. . . all groundwater wells are dry . . .”

Not only does Coldwater Cleaners not dispose of pollutants in the way that the Regional Water Board alleges, it would not even make sense to do so. This is simply because perc is too valuable to throw away. Moreover, since Coldwater Cleaners can show a chain of custody for the disposal of their pollutants, and that it avoided any risks of a spill or leak through use of a dry cleaning machine with a floor safety tank on the bottom, the only possible solutions lie elsewhere.

I. LEGAL ANALYSIS AND REQUEST FOR STAY

Section 2 of the Order provides that Water Code § 13267 subdivision (b)(1) states, in part that in conducting an investigation the regional water board may require any person who is, among other things, suspected of having discharged waste, to furnish technical or monitoring program reports. Water Code § 13267 subdivision (b)(1) also apparently provides that the burden of such reports, including costs, shall bear a reasonable relationship to the need for the reports and benefits and that the regional board “*shall provide the person with a written explanation with regard to the need for the reports and shall identify the evidence that supports requiring that person to provide the reports.*” (emphasis added). Therefore, the Water Board is unable to adequately provide evidence sufficient to compel Coldwater Cleaners to provide the reports the Regional Water Board requests in the Order.

Section 3 of the Order states that the Regional Board, in providing the explanation with regard to the reports and identifying the evidence that supports requiring that person to provide reports, is relying upon investigations that were conducted at the site since 1994, before Coldwater Cleaners was in existence. Any conclusions as to the supposed culpability of a tenant who took possession of the premises two years later, therefore, that uses those investigations as their premises, are faulty.

Section 3.1 of the Order further states that Shell has been conducting quarterly monitoring of the groundwater pollution levels at MW-1 through MW-14. What is the physical distribution of these sites? What is the trend of levels over time? Do the wells show a greater concentration of pollutants at the site of old Shell infrastructures, or at the site of the new, environmentally-friendly dry cleaners? Since Coldwater Cleaners has not polluted the site it is certainly likely that the VOCs described in the Order – if they are a kind of VOC particular to an antiquated dry cleaning process – were found on the site of the old dry cleaning establishment, rather than on the site of the new one.

Either the Regional Water Board negligently omitted to obtain these facts, or it already has them and has chosen to withhold them because it is easier to pursue a small family-owned business than a global oil corporation. If the Regional Water Board did obtain these facts, it would surely have adduced them if they offered any evidence to support its assignation of responsibility to Coldwater Cleaners. Therefore, the Regional Water Board either did not obtain the groundwater

monitoring reports, or obtained them and failed to pass on their conclusions; in either case, it seems that the Regional Water Board has not been dealing openly and fairly.

Section 4 of the Order suggests that, as a result of the samples collected, Coldwater Cleaners is automatically responsible for the discharges of waste identified because Coldwater Cleaners operates the activity that resulted in the discharge of waste. As shown above, this is false. The Regional Water Board has provided no evidence for its claims, and Coldwater Cleaners can provide ample evidence to disprove its suggestion.

Based on the foregoing, it is actually impossible as a matter of fact that Coldwater Cleaners contributed to any contamination at the site. Coldwater Cleaners assumes no liability for the operations of previous tenants. Just because Coldwater Cleaners is the current dry cleaners at the site does not mean it is responsible or that it should automatically have to bear the burden of responding to this Order. Based on the foregoing, there are undeniably substantial questions of fact with regards to the Regional Water Board's Order.

Moreover, the financial burden represented by the testing and reporting the Regional Water Board mandates is unconscionable. The burden is not only unconscionable because of Coldwater Cleaners' complete lack of responsibility in this issue. This is a small business with no culpability, run by an individual who would be unable to meet the costs involved, even possibly raising the specter bankruptcy or causing the business to close its doors. Even if Coldwater Cleaners could be held partly responsible – which they cannot – for any environmental toxicity at the site – at whatever the current levels are – Coldwater Cleaners would have to contest, among other things, the schedule of deadlines the Regional Water Board supplies pending a mutually satisfactory resolution to the issue, as well as request a stay of the Regional Water Board's Order pending review by the State Water Board.

Granting a stay risks no meaningful harm to the public. Testing on this site has supposedly been happening since 1994 – prior to the purchase of the dry cleaners and for over a decade. If this represented a genuine and imminent threat, then the Regional Water Board would have acted sooner to gather the information it seeks. Because these tests have been being run for twenty-four years at this point, it is inarguable that a stay would cause substantial harm to the public. If the Water Board alleges that action must be taken now, else Coldwater Cleaners might be liable, then it begs the question: why was not any action mandated at some point in the previous twenty-four years? The most recent measurement cited in the Order is six years old. It is therefore clear from the Regional Water Board's own actions that this matter is not as pressing as the schedule of deadlines implies. Coldwater Cleaners therefore requests a stay while this matter is resolved, based on the internal evidence in the Order that there is no imminent public health risk.

II. CONCLUSION

The Regional Water Board is unable to demonstrate who is truly liable for this contamination besides Shell Oil Company. Coldwater Cleaners will not accept the arbitrary allocation of blame for actions not taken by Coldwater Cleaners.

For all of the above reasons, Coldwater Cleaners must respectfully request that you remove Coldwater Cleaners from the Order.

Coldwater Cleaners understands that the Water Board does important work, and it supports the Water Board's work to safeguard the environment. However, it is factually, ethically, and legally insupportable to assign blame in this way. Coldwater Cleaners urges you to reconsider and look forward to discussing the matter further at your convenience.

Respectfully Submitted,



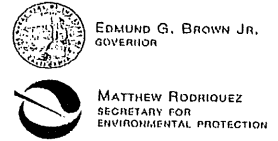
Armen Zenjiryan
for Anna Zenjiryan and Coldwater Cleaners

AZ |

cc: Ms. Jessica Pao
Water Resource Control Engineer
Remediation Section
Los Angeles Regional Water Quality Control Board
320 West 4th Street, Suite 200
Los Angeles, California 90013

Raafat Iskander
RS & KT Iskander Trust
23701 Kivik Street
Woodland Hills, California 91367

EXHIBIT A



EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

March 30, 2018

Raafat Iskander
RS & KT Iskander Trust
23701 Kivik Street
Woodland Hills, CA 91367-5831

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7017 0190 0000 4169 4610

Anna Zenjiryan
Coldwater Cleaners
4360 Coldwater Canyon Avenue
Studio City, CA 91604

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7017 0190 0000 4169 4634

SUBJECT: REQUIREMENT FOR TECHNICAL REPORTS PURSUANT TO CALIFORNIA WATER CODE SECTION 13267 ORDER

SITE: COLDWATER CLEANERS, 4360 COLDWATER CANYON AVENUE, STUDIO CITY, CA 91604 (SCP NO. 1417)

Dear Mr. Iskander and Ms. Zenjiryan:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is the public agency with primary responsibility for the protection of ground and surface water quality for all beneficial uses within major portions of Los Angeles and Ventura counties, including the above-referenced site (Site).

Regional Board records indicate operations at the at the Site included the former Shell Service Station that operated from approximately 1953 to 1976 and Coldwater Cleaners that began operation from 1966 to the present date. The Regional Board has reviewed multiple subsurface investigation reports and determined that soil and groundwater have been impacted by total petroleum hydrocarbons (TPH) and volatile organic compounds (VOCs) at the Site.

Enclosed is a California Water Code section 13267 Order No. R4-2018-0033 (Order) requiring RS & KT Iskander Trust and Coldwater Cleaners to submit a workplan to assess the indoor air quality inside the commercial building at the Site and a workplan to vertically and laterally delineate VOCs in the subsurface soil, soil vapor, and groundwater.

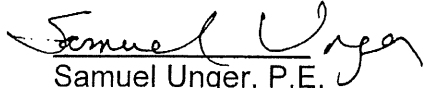
Raafat Iskander
Anna Zenjiryan

- 2 -

March 30, 2018
SCP No. 1417

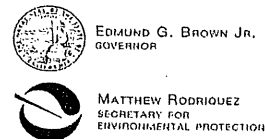
If you have any questions regarding this letter, please contact Ms. Jessica Pao at (213) 576-6729 or via email at Jessica.Pao@waterboards.ca.gov or contact Ms. Jillian Ly, Unit Chief at (213) 576-6664 or via email at Jillian.Ly@waterboards.ca.gov.

Sincerely,


Samuel Unger, P.E.
Executive Officer

Enclosure: Investigative Order No. R4-2018-0033

cc: Deborah Pryor, Equilon Enterprises, LLC, dba Shell Oil Products US
Jeff O'Keefe, Division of Drinking Water (Jeff.OKeefe@waterboards.ca.gov)
Rafael Villegas, LADWP Water Rights Group (Rafael.Villegas@ladwp.com)
Chris Repp, LADWP Water Rights Group (Chris.Repp@ladwp.com)
LADWP Water Rights Group (WaterRights@ladwp.com)



Los Angeles Regional Water Quality Control Board

INVESTIGATIVE ORDER NO. R4-2018-0033

**CALIFORNIA WATER CODE SECTION 13267
ORDER TO PROVIDE TECHNICAL REPORTS:
A WORKPLAN TO ASSESS INDOOR AIR QUALITY, AND
A WORKPLAN TO DELINEATE VOLATILE ORGANIC COMPOUNDS (VOCs)
IN SOIL, SOIL VAPOR, AND GROUNDWATER.**

**DIRECTED TO
RS & KT ISKANDER TRUST,
COLDWATER CLEANERS,**

**COLDWATER CLEANERS AND
FORMER SHELL SERVICE STATION
4360 COLDWATER CANYON AVENUE
STUDIO CITY, CALIFORNIA 91604
(SCP NO. 1417)**

**ON
MARCH 30, 2018**

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) makes the following findings and issues this Order pursuant to Water Code section 13267 requiring RS & KT Iskander Trust and Coldwater Cleaners to further investigate and assess the site located at 4360 Coldwater Canyon Avenue in Studio City, California (Site).

1. The Site is a two-story commercial building located in the southeast corner of Coldwater Canyon Avenue and Moorpark Street in Studio City. Currently the building units are occupied by Paglacci's restaurant, Coldwater Cleaners, and Oh La La Nail Salon. The Site was historically addressed as 12860 Moorpark Street and 4360, 4362, 4364, 4366, and 4370 Coldwater Canyon Avenue. The Coldwater Cleaners dry cleaning facility has been in operation since approximately 1966 and a former Shell gasoline service station was in operation from 1953 to 1976. In 1985, five underground storage tanks (USTs) [10,000-gallon, 8,000-gallon, 6,000-gallon, and 4,000-gallon containing gasoline and diesel fuel, and one 550-gallon waste oil] and all associated piping and fuel dispensers were removed from the Site.
 - 1.1. Due to the historical uses at the Site, soil, soil vapor, and groundwater investigations and other corrective actions have been conducted by Equilon Enterprises LLC, dba Shell Oil

MADELYN GLICKFELD, CHAIR | SAMUEL UNGER, EXECUTIVE OFFICER

320 West 4th St., Suite 200, Los Angeles, CA 90013 | www.waterboards.ca.gov/losangeles

♻️ RECYCLED PAPER

Products US (Shell) since 1994, pursuant to California Health & Safety Code section 25296.10 and California Code of Regulations, Title 23, sections 2720-2728.

1.2. Based on Shell's investigations to date and reports Shell has submitted to the Regional Board, it appears that the Site has been impacted by volatile organic compounds (VOCs), primarily tetrachloroethylene (PCE) and trichloroethylene (TCE), in addition to total petroleum hydrocarbons (TPH).

2. Water Code section 13267, subdivision (b)(1) states, in part:

"In conducting an investigation specified in subdivision (a), the regional board may require that any person who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge waste within its region, or any citizen or domiciliary, or political agency or entity of this state who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge waste outside of its region that could affect the quality of waters within its region shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. In requiring those reports, the regional board shall provide the person with a written explanation with regard to the need for the reports, and shall identify the evidence that supports requiring that person to provide the reports."

3. The Regional Board has reviewed multiple reports of subsurface investigations that were conducted at the Site since 1994 and has evidence that indicates the subsurface soil and groundwater is impacted by VOCs. The maximum detected concentrations for PCE, and TCE are summarized in the table below:

Soil Vapor			
	Concentration	Location and depth	Date of Sample
PCE	8,900 µg/L ^[1]	SV-6, 20 ft bgs ^[2]	July 2012
TCE	290 µg/L	SV-4, 20 ft bgs	July 2012
Soil			
PCE	10,000 µg/kg ^[3]	GP-1, 20 ft bgs	April 2006
TCE	5,500 µg/kg	GP-1, 20 ft bgs	April 2006
Groundwater			
PCE	16,000 µg/L	MW-4	January 2009
TCE	540 µg/L grab sample	GP-1	April 2006

^[1] µg/L – micrograms per liter

^[2] ft bgs – feet below ground surface

^[3] µg/kg – micrograms per kilogram

3.1. Shell has been conducting quarterly groundwater monitoring since August 1999 and continues to date. There are a total of fourteen groundwater monitoring wells located on and offsite (MW-1 through MW-14). Based on the fourth quarter 2017 groundwater

monitoring report, all groundwater wells are dry due to the decreasing groundwater levels.

- 3.2. Five sub-slab vapor pins (SSV-1 through SSV-5) were installed beneath the commercial building and vapor samples were collected and analyzed in 2013 and 2014. A vapor intrusion risk evaluation was conducted using the maximum detected PCE and TCE concentrations of 220 µg/L and 5.2 µg/L, respectively. The cancer risk calculations were 1.1×10^{-3} for PCE and 1.7×10^{-5} for TCE, which exceeds the residential cancer risk level of 1×10^{-6} .
- 3.3. Based on the cancer risk evaluation in 2014, a soil vapor extraction (SVE) pilot test was conducted in 2016. Two SVE wells (SVE-1 and SVE-2) were installed and screened from 15 to 25 ft bgs (SVE-1) and 10 to 20 ft bgs (SVE-2). The SVE system was operated for approximately 9.75 hours and resulted in very low well flow rates and no vacuum response from observation wells MW-1 and MW-2. The soil underlying the site is primarily fine-grained low permeability soil, which may have resulted in the lack of vacuum response.
4. This Order identifies RS & KT Iskander Trust and Coldwater Cleaners as the persons responsible for discharges of waste identified in paragraph three (3), because RS & KT Iskander Trust owns the property on which the waste is or has discharged and Coldwater Cleaners operates the activity that resulted in the discharge of waste.
5. This Order requires the persons named herein to prepare and submit technical reports and workplans to conduct an indoor air quality assessment to determine if vapor intrusion from the soil vapor concentrations of VOCs is a threat to human health and to further delineate the soil, soil vapor, and groundwater vertically and laterally. You are expected to submit these reports and workplans as required by this Order. The Regional Board may reject the reports and workplans if it is deemed incomplete and/or require revisions to the reports and workplans under this Order.
6. The burdens, including costs, of these reports and workplans bear a reasonable relationship to the need for the reports and workplans and the benefits to be obtained from the reports. The information is necessary to protect human health, to protect groundwater quality that may be impacted from wastes discharged to the soil and groundwater because of the activities performed at the Site, to adequately determine the extent of discharges of waste at and from the Site, to assure that discharges of waste that could impact water quality will be addressed, and to assure adequate cleanup of the Site, if necessary.
7. The issuance of this Order is an enforcement action by a regulatory agency and is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to California Code of Regulations, title 14, section 15321, subdivision (a)(2). This Order requires submittal of technical and/or monitoring reports, and may require the submittal of workplans. The scope of activities required to prepare the reports and workplans required

by this Order are not yet known. It is unlikely that compliance with this Order, including implementation of the workplans, could result in anything more than minor physical changes to the environment. If the implementation of this Order may result in significant impacts on the environment, the appropriate lead agency will address the CEQA requirements prior to approval of any work plan.

8. Any person aggrieved by this action of the Regional Water Board may petition the State Water Resources Control Board (State Water Board) to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must *receive* the petition by 5:00 p.m., 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at:
http://www.waterboards.ca.gov/public_notices/petitions/water_quality or will be provided upon request.

THEREFORE, IT IS HEREBY ORDERED that RS & KT Iskander Trust and Coldwater Cleaners, pursuant to Water Code section 13267, subdivision (b), are required to submit the following:

1. By **June 15, 2018**, a workplan to collect indoor air samples to assess indoor air quality in the commercial building in accordance to the Department of Toxic and Substances Control's (DTSC) Vapor Intrusion Guidance, dated October 2011. The first indoor air sampling event shall be collected over a 24-hour period to ensure that any diurnal fluctuations in indoor air concentrations are included in the sampling period. Indoor air analysis shall be analyzed for the full list of VOCs.
2. By **June 15, 2018**, a workplan to vertically and laterally delineate the VOC plume in soil and soil vapor at the Site and offsite. Concentrations of VOCs in soil vapor are detected in the deepest soil vapor probes at a maximum depth of 20 ft bgs. Deeper soil borings and vapor probes are necessary to assess the soil and soil vapor beyond a 20-foot depth until the soil and soil vapor concentrations are vertically delineated. Five soil vapor probes and five sub-slab vapor pins are installed onsite, and three soil vapor probes are installed in the neighboring property east of the Site. Soil vapor VOC concentrations are detected in all vapor probes and is currently not laterally delineated. Therefore, additional soil borings and soil vapor probes are necessary to vertically and laterally delineate the VOC plume in soil and soil vapor.
3. By **June 15, 2018**, a workplan to vertically and laterally delineate VOCs in groundwater. The Workplan shall propose the installation of groundwater monitoring wells to be screened across the current groundwater table and shall include a site map indicating the locations of the proposed wells.
4. Upon the Regional Board's approval and installation of the groundwater monitoring wells, a quarterly groundwater monitoring and sampling program is required for all wells at the Site.

The quarterly groundwater monitoring report must be submitted by the fifteenth day following the end of the quarter, as shown in the following schedule:

<u>Reporting Period</u>	<u>Report Due Date</u>
January – March	April 15 th
April – June	July 15 th
July – September	October 15 th
October – December	January 15 th

5. By **June 15, 2018**, complete the attached Chemical Storage and Use Questionnaire (Attachment 1).

6. The above items shall be submitted to:

Ms. Jessica Pao
Water Resource Control Engineer
Remediation Section
Los Angeles Regional Water Quality Control Board
320 West 4th Street, Suite 200
Los Angeles, CA 90013
Phone: (213) 576-6729
Email: Jessica.Pao@waterboards.ca.gov

7. Pursuant to Water Code section 13268, subdivision (a), any person who fails to submit reports in accordance with the Order is guilty of a misdemeanor. Pursuant to Water Code section 13268, subdivision (b)(1), failure to submit the required technical report described above by the specified due date(s) may result in the imposition of administrative civil liability by the Regional Board in an amount up to one thousand dollars (\$1,000) per day for each day the technical report is not received after the above due date. These civil liabilities may be assessed by the Regional Board for failure to comply, beginning with the date that the violations first occurred, and without further warning.


8. The State Water Resources Control Board adopted regulations (California Code of Regulations, title 23, sections 3891 et seq.) requiring the electronic submittals of information (ESI) for all site cleanup programs, starting January 1, 2005. Currently, all of the information on electronic submittals and GeoTracker contacts can be found on the Internet at the following link: https://www.waterboards.ca.gov/ust/electronic_submittal/index.shtml.

To comply with the above referenced regulations, you are required to upload all technical reports, documents, and well data to GeoTracker by the due dates specified in the Regional Board letters and orders issued to you or for the Site. However, the Regional Board may request that you submit hard copies of selected documents and data in addition to electronic submittal of information to GeoTracker. For your convenience, the GeoTracker Global ID for this site is T10000011441.

9. The Regional Board, under the authority given by Water Code section 13267, subdivision (b)(1), requires you to include a perjury statement in all reports as required by this Order. The perjury statement shall be signed by the senior authorized representatives of RS & KT Iskander Trust or Coldwater Cleaners (not by a consultant). The perjury statement shall be in the following format:

"I, [NAME], certify under penalty of law that this document and all attachments were prepared by me, or under my direction or supervision, in accordance with a system designed to assure that qualified personnel properly gathered and evaluated 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."

SO ORDERED.


Samuel Unger, P.E.
Executive Officer

3-30-18
Date

Attachments:

1. Chemical Storage and Use Questionnaire for Coldwater Cleaners



EDMUND G. BROWN JR.
GOVERNOR



MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

Chemical Storage and Use Questionnaire

- all responses are for the present dry cleaners only.

I. Facility Information

1. Address: ⁴³⁶² 4360 Coldwater Canyon Avenue, Studio City, California

II. Property Ownership Information

1. Name of Current Property Owner: ^{"Alex"} Raafat Iskander

2. Mailing Address of Current Property Owner: 23701 Kivik Street
Woodland Hills, CA 91367

3. Telephone: 818-992-6796 4. E-Mail: Alexiskander@gmail.com

5. Prior Property Owner(s) (provide a separate sheet of paper, if necessary):

Property Owner Name and Mailing Address	Dates of Ownership	
	From	To
DONALD KROCK OF K.R. EQUITIES, 146 CERRO CREST DRIVE, CAMARILLO, CA 93010	~ 2000	~ 2010

III. Current Tenant Information → as to dry cleaners only; other tenants on site.

1. Tenant Name: Coldwater Cleaners

2. Standard Industrial Classification (SIC) Code: _____

3. Brief Description of Business: Dry cleaning business

4. EPA/State Generator Number(s): _____

4362

Site Address: 4360 Coldwater Canyon Avenue, Studio City, California

- 5. Years in business at this location: ≈ 23
- 6. Contact Name: ARMEN
- 7. Telephone: 818-632-4730

IV. Past Tenants

List any prior tenants. Provide a separate sheet of paper, if necessary.

Company Name and Current Mailing Address	Type of Business	Dates of Operation at the Site	
		From	To
COLPAX CLEANERS , Adriana Diona	dry cleaners	≈ 1978	≈ 1995

V. Operations

Answer the following questions about operations of both current and past operations. On a separate sheet of paper, provide additional details for any "Yes" responses, including the time period and the name of any past tenant for which the "Yes" response applies.

Question	Current Tenant		Past Tenant(s)	
	Yes	No	Yes	No
1. Has manufacturing or plating of circuit boards occurred?		✓		✓
2. Have there been plating or anodizing tanks?		✓		✓
3. Has there been metal work performed?		✓		✓
4. Has there ever been a clarifier, sump, tank, or other holding tank for waste water?		✓		✓
5. Has there ever been an underground storage tank installed?		✓		✓
6. Has there ever been an above-ground storage tank (AST) installed?		✓		✓
7. Has there ever been an industrial waste permit for sewer discharge?		✓		✓
8. Has there ever been a septic system in use?		✓		✓
9. Have chemicals ever been stored at this location?	✓	✓	✓	✓
10. Have chlorinated solvents been used or stored at this location? <u>yes, as to perc (used not stored)</u>	✓		✓	
11. Has there ever been a release of chemicals to the ground surface or subsurface?		✓	unknown	
12. Use/disposal of solid propellants in rockets, matches, explosives and fireworks		✓		✓
13. Use/disposal of air bag inflators		✓		✓

Question	Current Tenant		Past Tenant(s)	
	Yes	No	Yes	No
14 Use/disposal of electric tubes containing perchlorate		✓		✓
15 Use/dispose of lubricating oils, fabrics, dyes, rubber, paints and certain fertilizers (e.g. sodium nitrate fertilizer)?		✓		✓
16 Perform leather tanning and finishing activities?		✓		✓
17 Preformed electroplating/ anodizing, aluminum refining and chromium plating?		✓		✓
18 Hazardous waste sites?		✓		✓
19 Use or dispose of wood preservatives that include chromium compounds (e.g. potassium dichromate, chromic acid, and sodium dichromate) and/or chlorinated volatile organic compounds?		✓		✓
20 Performed pigment making, leather tanning, welding?		✓		✓
21 Performed paint booth operations?		✓		✓
22 Use/dispose of solvents, including varnishes and lacquers and laboratory cryoscopy solvents?		✓		✓
23 Use/dispose of chloramine with water?		✓		✓

VI. Chemical of concern

1. Provide a list of chemicals or substances that were used, stored, or disposed of at the Site including VOCs and halogenated or chlorinated hydrocarbons such as Total Petroleum Hydrocarbon (TPH), Tetrachloroethylene (PCE), Trichloroethylene (TCE), 1,2-Dichloroethylene (1,2 DCE), Vinyl Chloride (VC), and Ethene. Identify the generated waste and its composition, with the approximate quantity disposed each month.

VII. Waste Management

1. What are the sources of industrial wastes from the site? Identify sources by process, composition of wastes generated, and approximate quantity disposed of monthly.

Besides PERC, no other chemicals used. We dispose of approximately a quarter of a gallon per month. Our operation is small & we clean about 3 to 4 times per week. We do not store PERC on property.

Sewer Information

1. Circle the type of sewer system currently in use: unknown, but probably:

Industrial

Septic Tank

Municipal

Cesspool

4362

2. Was a different sewer system used in the past? _____ Yes _____ No

If yes, specify type: _____

VIII. General Questions - as to dry cleaners only

1. Has there ever been a Phase I environmental site assessment (ESA) performed for the property?
_____ Yes _____ No

If "Yes", include a copy of each Phase I ESA report when submitting this questionnaire to the Regional Board.

2. Has there ever been a soil, soil vapor, groundwater, or waste water investigation conducted at the property? _____ Yes _____ No

If "Yes", on a separate sheet of paper, list all reports or other documents that provide the results of these investigations. Indicate which government agencies, if any, were involved in the project(s). Provide copies of these reports or other documents to the Regional Board when submitting this questionnaire.

IX. Chemical Storage and Use - as to dry cleaners only

1. Were the following chemicals used onsite?

- Tetrachloroethylene (PCE) Trichloroethylene (TCE) 1,4-Dioxane
- 1,1,1-Trichloroethane (1,1,1-TCA) Title 22 metals Hexavalent Chromium
- N-Nitrosodimethylamine (NDMA) 1,2,3-Trichloropropane (TCP) Perchlorate
- Total Petroleum Hydrocarbons

2. Using the attached Chemical Inventory Form (make additional copies, if necessary), list each chemical in current use or that has been used at the site in the past.

3. How many pages of Chemical Inventory Forms are attached? _____ 1 _____

X. Releases of Chemical Wastes - as to dry cleaners only

1. Does the site have documented releases of chemicals? Yes No

If yes, describe the nature and extent of the releases (date, volume, cause, emergency response actions).

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- 2. Have the source(s) of the release(s) been removed (yes/no)? Yes No

If no, what sources remain? _____

- 3. Has the release been stopped? Yes No Not applicable

XI. Site Characterization - as to dry cleaners only

- 1. Has the lateral and vertical extent of contamination at the site been completed?

Yes No Not applicable

- 2. Describe the field activities completed as part of site characterization (by whom, when, etc.)

Describe any remaining data gaps in site characterization: _____

- 3. Has a Conceptual Site Model been developed?

Yes No

- 4. Was a Human Health Risk Assessment (HHRA) completed?

Yes No

If yes, describe conclusions of the HHRA:

XII. Remedial Actions - as to dry cleaners only

- 1. Have remedial actions for soil, soil gas, or groundwater been performed for this site?

Yes No

4302

If yes, describe remedial actions performed:

2. Is groundwater monitoring being performed at the site? *unknown*

- Yes No *(other than current order)*

If yes, list the contaminants monitored and concentration distribution:

3. Were light non-aqueous phase liquids (LNAPL) or dense non-aqueous phase liquids (DNAPL) present?

- Yes No *unknown, but probably not*

4. If yes, specify which were present (check all that apply)?

- LNAPL DNAPL

5. If yes, were the LNAPL and or DNAPL removed to the extent practical?

- Yes No

6. What was the land use for the cleanup scenario?

- Unrestricted
 Residential
 Commercial/Industrial
 Other

7. Were any environmental regulatory letters or orders sent in association with the property? If yes, provide copies with this questionnaire.

- General Correspondence
 California Water Code 13267 Order
 Cleanup and Abatement Order (CAO)
 Notice of Violation (NOV)
 Administrative Civil Liability (ACL)
 No Further Requirements (NFR)
 Others (Specify): _____

No environmental regulatory letters or orders have been produced for the site. *- as today cleaners*

8. Was site closure achieved and approved by the appropriate agency

- Yes No Not applicable *- never happened*

Los Angeles Regional Water Quality Control Board

Chemical Inventory Form

Site Address: ⁴³⁶²4360 Coldwater Canyon Avenue, Studio City, California

1. Chemical Name: _____

2. Common/Trade Name: PERC

3. Quantity Stored: ≈ 60 gallons in dry cleaning machine

4. Storage Method: Underground Tank Drums
 Above-ground tank Other (specify) -

always in dry cleaning machine

5. Waste Disposal: Sewer Onsite recycling
 Hauled Offsite recycling -

third party removes from property

6. Is the waste treated prior to disposal? Yes No

7. Is manifest documentation available for designated waste streams? If yes, provide copies with this questionnaire. Yes No

we will provide invoices/dos from third party Removal service

This questionnaire shall be signed below by a principal, an executive of the company, or other authorized representative of the company in accordance with the following statement:

I certify under penalty of law that this document and all attachments were prepared by me, or under my direction or supervision, in accordance with a system designed to assure that qualified personnel properly gathered and evaluated 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.

Signature: A. Zanjiryan

Date: 4/27/13

Printed Name: Armen Zanjiryan

Title: Attorney

Telephone: 818 6324730

E-Mail: armen.zanjiryan@gmail.com

EXHIBIT B

DECLARATION OF ANNA ZENJIRYAN

I, Anahit “Anna” Zenjiryan, declare as follows:

1. My name is Anna Zenjiryan and I purchased Colfax Cleaners (now Coldwater Cleaners) in Studio City, California in approximately November 1995. I submit this declaration in support of my request for a stay on the Regional Water Board’s Order, pending review of this petition by the State Water Board. I have personal knowledge of the facts stated herein. If called as a witness, I would and could competently testify thereto truthfully and under oath.

2. I received notice of the Order on or about April 5, 2018. The Order was mailed to the incorrect address. Coldwater Cleaners is located at 4362 Coldwater Canyon in Studio City. The letter was mailed to 4360 Coldwater Canyon in Studio City. The property owner sent me the letter in the mail after he received notice of it via certified mail.

3. There will be substantial harm to Coldwater Cleaners if the stay Coldwater Cleaners is requesting is not granted. If Coldwater Cleaners is forced to have to provide the information that the Regional Water Board is requiring it to provide (without an opportunity to appeal), before this petition is reviewed, Coldwater Cleaners will be subjected to pay thousands of dollars on fees over the next few months, all of which will impose a significant financial hardship on Coldwater Cleaners. I have been scrambling to gather the evidence and documentation in support of the petition and request for stay for the past 20 days, but this has not been enough time for me to begin to evaluate the costs associated with the requests contained in the Order.

4. Based on my knowledge and understanding, this testing will cost in excess of \$10,000. This is a small dry cleaners, operated by family since approximately 1995, and the burden of this testing – for pollutants which Coldwater Cleaners can factually demonstrate were not emitted by Coldwater Cleaners – could cause it to have to close its doors. Coldwater Cleaners does not have the financial resources to pay for the testing being requested by the Regional Water Board. Coldwater Cleaners is also now being asked to pay for the Regional Water Board’s attorney’s fees, which they estimate will be around \$3,500.



I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 27 day of 4-27-18, 2018 at Los Angeles, California.



ANNA ZENJIRYAN

EXHIBIT C



South Coast Air Quality Management District

South Coast
AQMD

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

DATE: 05/16/2017

EQUIPMENT LOCATED AT: 4362 COLDWATER CYN
STUDIO CITY, CA 91604-1437

LEGAL OWNER CO. ID: 136819
OR OPERATOR COLDWATER CLEANERS
4362 COLDWATER CYN
STUDIO CITY, CA, 91604-1437

PERMIT/APPLICATION RENEWAL

PERMIT/ APPL NBR	EQUIPMENT DESCRIPTION	NEXT RENEWAL DATE
BILLING YEAR: 2016		
G1126	DRY CLEANING, DRY-TO-DRY NV, W/ SIC, PERC	06/16/2018





CALIFORNIA AIR TOXICS "HOT SPOTS" PROGRAM FEE INVOICE

INVOICE NO. 3072792

PAGE: 1

California Health and Safety Code Section 44380 requires the collection of fees from facilities subject to the requirements of the Air Toxics "Hot Spots" Information and Assessment Act of 1987.

EQUIPMENT 4362 COLDWATER CYN
LOCATED AT: STUDIO CITY CA 91604
FACILITY ID: 136819

INVOICE DATE: 3/1/17

LEGAL OWNER / OPERATOR COLDWATER CLEANERS
LOCATED AT: 4362 COLDWATER CYN STUDIO CITY CA 91604

ORIGINAL INVOICE

Table with 6 columns: Transaction Number, Transaction Date, Reference Number, Description, Transaction Amount, Transaction Balance. Includes handwritten date 3/17/17 and amount 3851.

REMARKS

Please return the duplicate copy of this invoice with your remittance to ensure proper credit to your account. Returned checks will be subject to a \$25.00 service charge.

INVOICE TOTAL : \$202.57

If payment not received by 5/1/2017 a 5% late payment surcharge will be imposed and all operating permits at the facility will be subject to revocation. Unpaid "Hot Spots" fees prevent AQMD from accepting applications from your facility.

Please return duplicate copy with remittance. Make check payable to South Coast AQMD.

For questions or information, call Billing Services at 909-396-2900; within California, you may call toll free 866-888-8838. Send email inquiries to billingservices@aqmd.gov.

Mail remittance to: FILE NUMBER 54296, LOS ANGELES, CA 90074-4296



AQMD

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

CALIFORNIA AIR TOXICS "HOT SPOTS" PROGRAM FEE INVOICE

INVOICE NO.

3072792

PAGE: 1

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EQUIPMENT 4362 COLDWATER CYN
LOCATED AT: STUDIO CITY CA 91604
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LEGAL OWNER / OPERATOR COLDWATER CLEANERS
LOCATED AT: 4362 COLDWATER CYN STUDIO CITY CA 91604

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[Home \(../../../../../home\)](#) / [Rules & Compliance \(../../../../../rules-compliance\)](#) / [Compliance \(../../../../../compliance\)](#) / [Toxic "Hot Spots" \(AB 2588\) \(../../toxic-hot-spots-ab-2588\)](#) / [Industry-wide Source Facilities \(../iws-facilities\)](#) / Perc Dry Cleaners

Share:



Perc Dry Cleaning Facilities

Start searching for perc dry cleaners in your neighborhood.

([http://www3.aqmd.gov/webappl/OI.Web/OI.aspx?](http://www3.aqmd.gov/webappl/OI.Web/OI.aspx?jurisdictionID=AQMD.gov&shareID=e25b31a1-f9dc-48d4-8ce2-86e13a835583)

[jurisdictionID=AQMD.gov&shareID=e25b31a1-f9dc-48d4-8ce2-86e13a835583](http://www3.aqmd.gov/webappl/OI.Web/OI.aspx?jurisdictionID=AQMD.gov&shareID=e25b31a1-f9dc-48d4-8ce2-86e13a835583))

Dry cleaning facilities that use perchloroethylene as a cleaning solvent are called perc dry cleaners. Perchloroethylene is a known human carcinogen and perc dry cleaners are subject to SCAQMD Rule 1421 – Control of Perchloroethylene Emissions from Dry Cleaning Systems (</docs/default-source/rule-book/reg-xiv/rule-1421.pdf?sfvrsn=4>) (PDF, 52kb). An industry-wide risk assessment was performed for the perc dry cleaners. Perchloroethylene usage limits to ensure cancer risks less than 25 in a million were established using emission estimates, dispersion modeling, and risk assessment procedures approved by the Governing Board in 2007. The procedures are briefly described next, but a more detailed discussion of the methods and results is available in the Health Risk Assessment for Perc Dry Cleaners (/docs/default-source/planning/risk-assessment/perc_dry_cleaner_hra.pdf?sfvrsn=0) (PDF, 989kb).

The three key variables necessary to estimate cancer risks from perc dry cleaners are:

- Perchloroethylene usage, usually expressed as gallons per month or gallons per year;

- Distance to the nearest residential and commercial receptor, which are always assumed to be directly downwind of the facility; and
- Location of the perc dry cleaner, which is necessary for determining the appropriate meteorological site.

For facilities without reported receptor distances, staff calculated the distance from the facility to the nearest census block centroids which were obtained from a database developed for CARB’s Hot Spots Analysis and Reporting Program (HARP) (<http://www.arb.ca.gov/toxics/harp/harp.htm>) modeling system. According to Rule 1421 the use of perchloroethylene as a cleaning solvent will be discontinued by December 31, 2020. Effects of the future phase out of perchloroethylene are evident in the decreasing number of permitted perc dry cleaners as shown in Figure 1 and trends of ambient perchloroethylene concentrations in the South Coast Air Basin illustrated in Figure 2.

Figure 1. Recent Trends in Perc Dry Cleaning Facilities

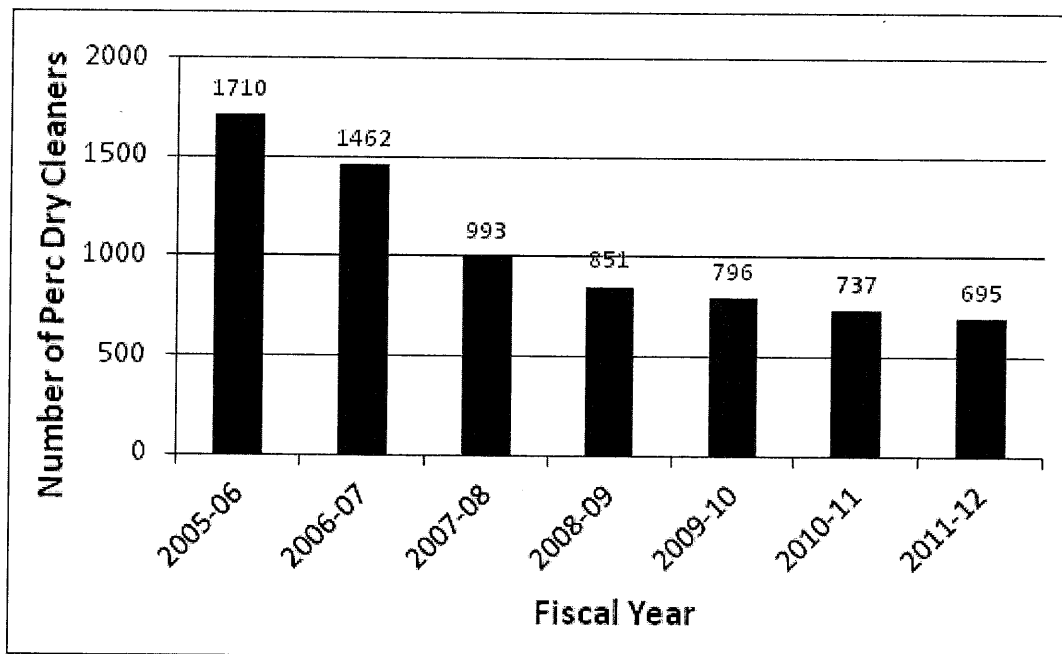
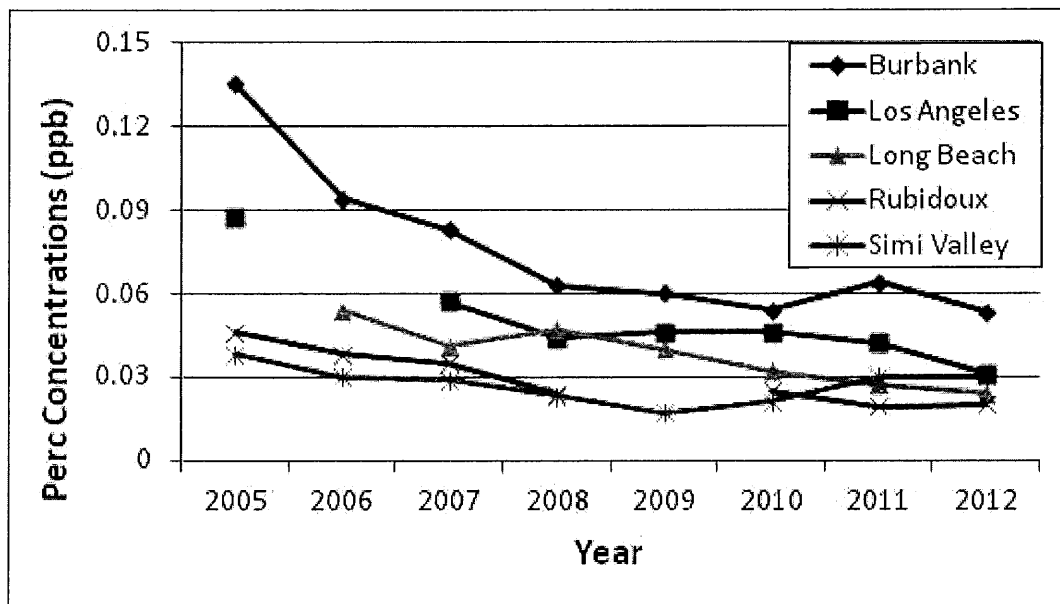


Figure 2. Recent Trends in Ambient Perchloroethylene Concentrations



Important Links:

- Search for Perc Dry Cleaners in Your Neighborhood (<http://www3.aqmd.gov/webappl/OI.Web/OI.aspx?jurisdictionID=AQMD.gov&shareID=e25b31a1-f9dc-48d4-8ce2-86e13a835583>);

Cancer risks associated with specific perc dry cleaners

- Detailed Description of Methods Used to Estimate Cancer Risks from Perc Dry Cleaners (/docs/default-source/planning/risk-assessment/perc_dry_cleaner_hra.pdf?sfvrsn=0) (PDF, 989kb)
- CARB's Hotspots Analysis and Reporting Program (HARP) (<http://www.arb.ca.gov/toxics/harp/harp.htm>)
- South Coast AQMD Rule 1421 (</docs/default-source/rule-book/reg-xiv/rule-1421.pdf?sfvrsn=4>) (PDF, 52kb)

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(Adopted December 9, 1994)(Amended June 13, 1997)
(Amended December 6, 2002)

**RULE 1421. CONTROL OF PERCHLOROETHYLENE EMISSIONS FROM
DRY CLEANING SYSTEMS.**

(a) Purpose

The purpose of the rule is to protect public health by reducing perchloroethylene emissions from dry cleaning systems by transitioning them to non-perchloroethylene alternatives. Facilities using perchloroethylene dry cleaning systems are required to comply with applicable portions of this rule and the federal National Emission Standard for Hazardous Air Pollutants (NESHAP) for Source Categories: Perchloroethylene Dry Cleaning Facilities (40 Code of Federal Regulations [CFR] 63.320, *et seq*) and the state Airborne Toxic Control Measure (ATCM) for Emissions of Perchloroethylene from Dry Cleaning Operations (17 California Code of Regulations [CCR] 93109, *et seq*).

(b) Applicability

The rule applies to all persons owning or operating a perchloroethylene dry cleaning facility.

(c) Definitions

For the purposes of this rule, the following definitions shall apply.

- (1) ADSORPTIVE CARTRIDGE FILTER means a replaceable cartridge filter that contains diatomaceous earth or activated clay as the filter medium.
- (2) ALTERNATIVE CLEANING TECHNOLOGY means a textile cleaning technology which may include, but is not limited to: water-based wet cleaning, carbon dioxide (CO₂) cleaning, or any other non-perchloroethylene cleaning solvent that complies with Rule 1401 requirements.
- (3) CARTRIDGE FILTER means a replaceable cartridge filter that contains one of the following as the filter medium: paper, activated carbon, or paper and activated carbon. A cartridge filter contains no diatomaceous earth or activated clay. Cartridge filters include, but are not limited to: standard filters, split filters, "jumbo" filters, and all carbon polishing filters.
- (4) CLOSED-LOOP MACHINE means dry cleaning equipment in which washing, extraction, and drying are all performed in the same single unit

(also known as dry-to-dry) and which recirculates the perchloroethylene-laden vapor through a primary control system with no exhaust to the atmosphere during the drying cycle. A closed-loop machine may allow for venting to the ambient air through a fugitive control system after the drying cycle is completed and while the machine door is open.

- (5) CO-LOCATED WITH A RESIDENCE means sharing a common wall, floor, or ceiling with a residence. For the purposes of this definition, "residence" means any dwelling or housing which is owned, rented, or occupied by the same person for a period of 180 days or more, excluding short-term housing such as a motel or hotel room rented and occupied by the same person for a period of less than 180 days.
- (6) CONVERTED MACHINE means a vented machine that has been modified to be a closed-loop machine by eliminating the aeration step, and installing a primary control system, and providing for recirculation of the perchloroethylene-laden vapor with no exhaust to the atmosphere. A converted machine allows for venting to the ambient air through a fugitive control system after the drying cycle is complete and only while the machine door is open.
- (7) COOL DOWN means the portion of the drying cycle that begins when the heating mechanism deactivates and the refrigerated condenser continues to reduce the temperature of the air recirculating through the drum to reduce the concentration of perchloroethylene in the drum.
- (8) COMPLIANCE PERIOD means the time from the effective date of this rule in the District until a facility must be in compliance with the specific requirements of this rule.
- (9) DESORPTION means the regeneration of an activated carbon bed, or any other type of vapor adsorber, by removal of the adsorbed solvent using hot air, steam, or other means.
- (10) DIP TANK OPERATION means immersion of materials in a solution that contains perchloroethylene, for purposes other than dry cleaning, in a tank or container that is separate from the dry cleaning equipment.
- (11) DISTRICT means the South Coast Air Quality Management District.
- (12) DRUM means the rotating cylinder or wheel of the dry cleaning machine that holds the materials being cleaned.
- (13) DRY CLEANING EQUIPMENT means any machine, device, or apparatus used to dry clean materials with perchloroethylene or to remove residual

perchloroethylene from previously cleaned materials. Dry cleaning equipment may include, but is not limited to, a transfer machine, a vented machine, a converted machine, a closed-loop machine, a reclaimer, or a drying cabinet.

- (14) DRY CLEANING FACILITY means one or more dry cleaning systems which are located on one or more contiguous properties within the District in actual physical contact or separated solely by a public roadway, or other public right-of-way, and are owned or operated by the same person (or by persons under common control).
- (15) DRY CLEANING SYSTEM means all of the following equipment, devices, or apparatus associated with the perchloroethylene dry cleaning process: dry cleaning equipment; filter or purification systems; waste holding, treatment, or disposal systems; perchloroethylene supply systems; dip tanks; pumps; gaskets; piping, ducting, fittings, valves, or flanges that convey perchloroethylene-contaminated air; and control systems.
- (16) DRYING CABINET means a housing in which materials previously cleaned with perchloroethylene are placed to dry and which is used only to dry materials that would otherwise be damaged by the heat and tumbling action of the drying cycle.
- (17) DRYING CYCLE means the process used to actively remove the perchloroethylene remaining in the materials after washing and extraction. For closed-loop machines, the heated portion of the cycle is followed by cool-down and may be extended beyond cool-down by the activation of a control system. The drying cycle begins when heating coils are activated and ends when the machine ceases rotation of the drum.
- (18) ENVIRONMENTAL TRAINING PROGRAM means an initial course or a refresher course of the environmental training program for perchloroethylene dry cleaning operations that has been authorized by the Air Resources Board according to the requirements of 17 CCR, Section 93110.
- (19) EQUIVALENT CLOSED-LOOP VAPOR RECOVERY SYSTEM means any device or combination of devices that achieves, in practice, a perchloroethylene recovery performance equal to or exceeding that of refrigerated condensers.
- (20) EXISTING FACILITY means any dry cleaning facility that was in operation prior to December 6, 2002. Facility relocations within the

jurisdictional boundaries of the District shall be considered existing facilities for the purpose of this rule.

- (21) FACILITY means any person or persons who own or operate perchloroethylene dry cleaning equipment which are owned or operated by the same person or persons, and are located on the same parcel or contiguous parcels.
- (22) FACILITY MILEAGE means the efficiency of perchloroethylene use at a facility, expressed as the pounds of materials cleaned per gallon of perchloroethylene used, and calculated for all dry cleaning machines at the facility over a specified time period.
- (23) FUGITIVE CONTROL SYSTEM is a device or apparatus that collects fugitive perchloroethylene vapors from the machine door, button and lint traps, still, or other intentional openings of the dry cleaning system, and routes those vapors to a device that reduces the mass of perchloroethylene prior to exhaust of the vapor to the atmosphere.
- (24) FULL-TIME EMPLOYEE means any person who is employed at the dry cleaning facility and averages at least thirty hours per week in any 90-day period.
- (25) GALLONS OF PERCHLOROETHYLENE USED means the volume of perchloroethylene, in gallons, introduced into the dry cleaning equipment, and not recovered at the facility for re-use on-site in the dry cleaning equipment, over a specified time period.
- (26) HALOGENATED-HYDROCARBON DETECTOR means a portable device capable of detecting vapor concentrations of perchloroethylene of 25 ppmv or less and indicating an increasing concentration by emitting an audible signal or visual indicator that varies as the concentration changes.
- (27) LIQUID LEAK means a leak of liquid containing perchloroethylene of more than 1 drop every 3 minutes.
- (28) MAJOR SOURCE is any dry cleaning facility that emits or has the potential to emit more than 9.1 megagrams per year (10 tons per year) of perchloroethylene to the atmosphere. In lieu of measuring a facility's potential to emit perchloroethylene emissions or determining a facility's potential to emit perchloroethylene emissions, a dry cleaning facility is a major source if it includes only dry-to-dry machine(s) and has a total yearly perchloroethylene consumption greater than 8,000 liters (2,100 gallons).

- (29) MATERIALS mean wearing apparel, draperies, linens, fabrics, textiles, rugs, leather, and other goods that are being dry cleaned.
- (30) MUCK COOKER means a device for heating perchloroethylene-laden waste material to volatilize and recover perchloroethylene.
- (31) NEW FACILITY means a dry cleaning facility that was not in operation before December 6, 2002. Facility relocations, within the jurisdictional boundaries of the District, shall not be considered new facilities for the purposes of this rule.
- (32) PERCHLOROETHYLENE (PERC) means the substance with the chemical formula C_2Cl_4 , also known by the name tetrachloroethylene, which has been identified by the Air Resources Board and listed as a toxic air contaminant in 17 CCR, Section 93000.
- (33) PERCHLOROETHYLENE DRY CLEANING OR DRY CLEANING means the process used to remove soil, greases, paints, and other unwanted substances from materials with perchloroethylene.
- (34) POUNDS OF MATERIALS CLEANED PER LOAD means the total dry weight, in pounds, of the materials in each load dry cleaned at the facility, as determined by weighing each load on a scale prior to dry cleaning and recording the value.
- (35) PRIMARY CONTROL SYSTEM means a refrigerated condenser, or an equivalent closed-loop vapor recovery system approved by the District.
- (36) RECLAIMER means a machine, device, or apparatus used only to remove residual perchloroethylene from materials that have been previously cleaned in a separate piece of dry cleaning equipment.
- (37) REFRIGERATED CONDENSER means a closed-loop vapor recovery system into which perchloroethylene vapors are introduced and trapped by cooling below the dew point of the perchloroethylene.
- (38) SECONDARY CONTROL SYSTEM means a device or apparatus that reduces the concentration of perchloroethylene in the recirculating air at the end of the drying cycle, beyond the level achievable with a refrigerated condenser alone. An "integral" secondary control system is designed and offered as an integral part of a production package with a single make and model of dry cleaning machine and primary control system. An "add-on" secondary control system is designed or offered as a separate retrofit system for use on multiple machine makes and models.

- (39) SELF-SERVICE DRY CLEANING MACHINE means a perchloroethylene dry cleaning machine that is loaded, activated, or unloaded by the customer.
- (40) SENSITIVE RECEPTOR LOCATIONS include schools, daycare centers, hospitals, and convalescent homes.
- (41) SEPARATOR means any device used to recover perchloroethylene from a water-perchloroethylene mixture.
- (42) STILL means a device used to volatilize and recover perchloroethylene from contaminated solvent removed from the cleaned materials.
- (43) TRAINED OPERATOR means the owner, the operator, or an employee of the facility, who has completed and holds a valid record of completion for the initial course of an environmental training program and maintains her/his status by successfully completing the refresher courses as required.
- (44) TRANSFER MACHINE means a combination of perchloroethylene dry cleaning equipment in which washing and extraction are performed in one unit and drying is performed in a separate unit.
- (45) VAPOR ADSORBER means a bed of activated carbon or other adsorbent into which perchloroethylene vapors are introduced and trapped for subsequent desorption.
- (46) VAPOR LEAK means an emission of perchloroethylene vapor from unintended openings in the dry cleaning system, as indicated by a rapid audible signal or visual signal from a halogenated-hydrocarbon detector or a concentration of perchloroethylene exceeding 50 ppmv as methane or 25 ppmv as perchloroethylene as indicated by a portable analyzer.
- (47) VENTED MACHINE means dry cleaning equipment in which washing, extraction, and drying are all performed in the same single unit and in which fresh air is introduced into the drum in the last step of the drying cycle and exhausted to the atmosphere, either directly or through a control device.
- (48) WASTE WATER EVAPORATOR means a device that vaporizes perchloroethylene contaminated waste water through the addition of thermal or chemical energy, or through physical action.
- (49) WATER-REPELLING OPERATIONS means the treatment of materials with a water-repellent solution that contains perchloroethylene.

(50) WET CLEANING means a process which is water-based and uses computer-controlled washers and dryers, detergents, and specialized finishing equipment.

(d) Equipment Requirements

The owner/operator shall comply with the following prohibitions and requirements.

(1) Prohibition.

(A) On or after June 9, 1996, a person shall not install a converted machine or modify a vented dry cleaning machine to a converted machine.

(B) On or after October 1, 1998, a person shall not operate any transfer system, any vented dry cleaning machine, or any self-service dry cleaning machine.

(C) On or after January 1, 2003, a person shall not perform any dip tank operations in connection with dry cleaning.

(D) On or after January 1, 2003, an owner or operator of a new facility may not operate a perchloroethylene dry cleaning system.

(E) On or after January 1, 2003, an owner or operator of an existing facility shall not install additional perchloroethylene dry cleaning system(s), except as provided in subparagraph (d)(1)(F).

(F) On or after December 6, 2002, an owner or operator of an existing facility shall be allowed to operate its perchloroethylene dry cleaning system(s) until the end of its useful life and, upon replacement, shall be allowed to operate no more than one perchloroethylene dry cleaning system per facility until December 31, 2020, provided the equipment has integral primary and secondary controls. All such facilities shall comply with Rule 1402 and shall not operate a dry cleaning system without a secondary control on and after November 1, 2007.

(G) On or after July 1, 2004, an owner or operator of a dry cleaning facility shall not operate any converted machines.

(2) Perchloroethylene dry cleaning equipment shall meet the following specifications:

(A) A primary control system shall:

- (i) operate during both the heated and cool-down phases of the drying cycle and shall reduce the perchloroethylene drum concentration in the recirculating air stream to 8,600 ppmv;
 - (ii) not exhaust to the atmosphere or workroom;
 - (iii) not require the addition of any form of water to the primary control system that results in the physical contact between water and perchloroethylene; and
 - (iv) consists of a refrigerated condenser which shall:
 - (I) achieve an outlet vapor temperature, downstream of any bypass, of less than or equal to 45°F (7.2°C) during cool-down; and
 - (II) have a graduated thermometer or alternative temperature device with a minimum range from 0°F (-18°C) to 150°F (66°C), which measures the temperature of the outlet vapor stream, downstream of any bypass of the condenser, and is easily visible to the operator.
- (B) An approved equivalent closed-loop vapor recovery system may be used in lieu of a primary control system, if it:
- (i) uses a technology that has been demonstrated, pursuant to the requirements of subdivision (i), to achieve a perchloroethylene drum concentration of 8,600 ppmv or less in each test; and
 - (ii) has a device that measures the perchloroethylene concentration, or a demonstrated surrogate parameter, in the drum at the end of each drying cycle, before the machine door is opened and any fugitive control system activates, and indicates if the concentration is above or below 8,600 ppmv. This device shall be installed such that the reading is easily visible to the operator.
- (C) A secondary control system shall:
- (i) be designed to function with a primary control system or be designed to function as a combined primary control system and secondary control system that meets all of the following applicable requirements;
 - (ii) not exhaust to the atmosphere or workroom;

- (iii) not require the addition of any form of water to the secondary control system that results in physical contact between the water and perchloroethylene;
 - (iv) use a technology that has been demonstrated, pursuant to the requirements of subdivision (i), to achieve a perchloroethylene concentration in the drum of 300 ppmv or less in each test;
 - (v) have a holding capacity of two hundred percent (200%) or greater of the maximum quantity of perchloroethylene vapor expected in the drum prior to the activation of the system; and
 - (vi) for add-on secondary control systems only, the system shall be sized and capable of reducing the perchloroethylene concentration in the drum from 8,600 ppmv or greater to 300 ppmv or less in the maximum volume of recirculating air in the dry cleaning machine and all contiguous piping.
- (3) Specifications for Other Perchloroethylene Dry Cleaning Equipment
- (A) A drying cabinet shall:
 - (i) be fully enclosed; and
 - (ii) be exhausted via one of the following methods:
 - (I) to a control system that has been demonstrated, pursuant to the requirements of subdivision (i), to achieve a perchloroethylene concentration of 100 ppmv or less in each test, measured at the outlet without dilution; or
 - (II) to a control system that reduces the concentration of perchloroethylene in a closed system with no exhaust to the atmosphere or workroom.
 - (B) A converted machine shall meet all of the following requirements, as demonstrated on-site to the District, upon conversion and on or before June 9, 1996:
 - (i) All process vents that exhaust to the atmosphere or workroom during washing, extraction, or drying shall be sealed.

- (ii) The converted machine shall use an appropriately-sized primary control system to recover perchloroethylene vapor during the heated and cool-down phases of the drying cycle.
- (I) A refrigerated condenser shall be considered appropriately sized, for a machine converted on or after May 4, 1994, if the water-cooled condensing coils are replaced with refrigerant-cooled condensing coils; and the compressor of the refrigerated condenser shall have a capacity, in horsepower (hp) that is no less than the minimum capacity, determined as follows:
- $$\text{Min. Cap. (hp)} = \frac{\text{Cap. of Machine (lbs)}}{12}$$
- (II) A refrigerated condenser shall be considered appropriately sized, for a machine converted prior to May 4, 1994, if the refrigerated condenser meets the specifications for new conversions in subclause (d)(3)(B)(ii)(I); or the refrigerated condenser achieves, and maintains for 3 minutes, an outlet vapor temperature, measured downstream of the condenser and any bypass of the condenser, of less than or equal to 45°F (7.2°C) within 10 minutes of the initiation of cool-down.
- (III) An equivalent closed-loop vapor recovery system shall be considered appropriately sized for the conversion of a vented machine if the system does not extend the total drying time by more than five minutes to meet the specifications of clause (d)(2)(B).
- (iii) The converted machine shall operate with no liquid leaks and no vapor leaks. Any seal, gasket, or connection determined to have a liquid leak or vapor leak shall be replaced.

(e) Good Operating Practices for Perchloroethylene Dry Cleaning Systems

The owner/operator shall not operate a perchloroethylene dry cleaning system unless all of the following requirements are met:

(1) Operation and maintenance requirements. The trained operator, or his/her designee, shall operate and maintain all components of the dry cleaning system in accordance with the requirements of this section and the conditions specified in the facility's operating permit. For operations not specifically addressed, the components shall be operated and maintained in accordance with the manufacturer's recommendations.

(A) Each operation and maintenance function and the date performed shall be recorded on the checklist provided by the District. The operation and maintenance checklist shall include, at a minimum, the following requirements:

- (i) Refrigerated condensers shall be operated to ensure that exhaust gases are recirculated until the air-vapor stream temperature on the outlet side of the refrigerated condenser, downstream of any bypass, is less than or equal to 45°F (7.2°C).
- (ii) Primary control systems, other than refrigerated condensers, shall be operated to ensure that exhaust gases are recirculated until the perchloroethylene concentration in the drum is less than or equal to 8,600 ppmv at the end of the drying cycle, before the machine door is opened and any fugitive control system activates.
- (iii) Vapor adsorbers used as a primary control system or secondary control system shall be operated to ensure that exhaust gases are recirculated at the temperature specified by the District, based on the manufacturer's recommendations for optimum adsorption. These vapor adsorbers shall be desorbed according to the conditions specified by the District in the facility's operating permit, including a requirement that no perchloroethylene vapors shall be routed to the atmosphere during routine operation or desorption.

- (iv) The cooling coils must be removed and cleaned every two years by a qualified individual from a repair company licensed by the State of California to handle refrigerant.
 - (v) The main door, still door, button trap, and lint trap gaskets must be replaced every two years.
 - (vi) Cartridge filters and adsorptive cartridge filters shall be handled using one of the following methods:
 - (I) Drained in the filter housing, before disposal, for no less than 24 hours for cartridge filters and 48 hours for adsorptive cartridge filters. If the filters are then transferred to a separate device to further reduce the volume of perchloroethylene, this treatment shall be done in a system that routes any vapor to a primary control system, with no exhaust to the atmosphere or workroom.
 - (II) Dried, stripped, sparged, or otherwise treated, within the sealed filter housing, to reduce the volume of perchloroethylene contained in the filter.
 - (vii) A still, and any muck cooker, shall not exceed 75 percent of its capacity, or an alternative level recommended by the manufacturer. A still, and any muck cooker, shall cool to 100°F (38°C) or less before emptying or cleaning.
 - (viii) Button and lint traps shall be cleaned each working day and the lint placed in a tightly sealed container.
 - (ix) All parts of the dry cleaning system where perchloroethylene may be exposed to the atmosphere or workroom shall be kept closed at all times except when access is required for proper operation and maintenance.
 - (x) Waste water evaporators shall be operated to ensure that no liquid perchloroethylene or visible emulsion is allowed to vaporize.
- (2) Leak check and repair requirements. The trained operator, or her/his designee, shall inspect the dry cleaning system for liquid leaks and vapor leaks. The trained operator, or her/his designee, shall record the status of each component on the checklist provided by the District.

- (A) The dry cleaning system shall be inspected at least once per week for liquid leaks and for vapor leaks, beginning June 9, 1996, using one of the following techniques:
- (i) a halogenated-hydrocarbon detector; or
 - (ii) a portable gas analyzer or an alternative method approved by the District.
- (B) Any liquid leak or vapor leak that has been detected by the operator shall be noted on the checklist and repaired according to the requirements of this subparagraph. If the leak is not repaired at the time of detection, the leaking component shall be physically marked or tagged in a manner that is readily observable by a District inspector.
- (C) Any liquid leak or vapor leak detected by the District, which has not been so noted on the checklist and marked on the leaking component of the dry cleaning system, shall constitute a violation of this section. For enforcement purposes, the District shall identify the presence of a vapor leak by determining the concentration of perchloroethylene with a portable analyzer:
- (i) according to ARB Test Method 21 (17 CCR, Section 94124, March 28, 1986); and
 - (ii) measured 1 cm away from the dry cleaning system.
- (D) Any liquid leak or vapor leak shall be repaired within 24 hours of detection.
- (i) If repair parts are not available at the facility, the parts shall be ordered within two working days of detecting such a leak. Such repair parts shall be installed within five working days after receipt. A facility with a leak that has not been repaired by the end of the 15th working day after detection shall not operate the dry cleaning equipment, until the leak is repaired, unless a leak-repair extension is granted from the District.
 - (ii) The District may grant a leak-repair extension to a facility, for a single period of 30 days or less, if the District makes these findings:
 - (I) the delay in repairing the leak could not have been avoided by action on the part of the facility;

- (II) the facility used reasonable preventive measures and acted promptly to initiate the repair;
 - (III) the leak would not significantly increase perchloroethylene exposure near the facility; and
 - (IV) the facility is in compliance with all other requirements of this section and has a history of compliance.
- (3) Environmental training requirements. The facility shall have one or more trained operators.
- (A) A trained operator shall be the owner, the operator, or another employee of the facility, who successfully completes the initial course of an environmental training program to become a trained operator. Evidence of successful completion of the initial course shall be the original record of completion issued pursuant to 17 CCR, Section 93110. The trained operator shall be a full-time employee of the facility. Except for the provisions of clause (e)(3)(C)(ii), one person cannot serve as the trained operator for two or more facilities simultaneously.
 - (B) Each trained operator shall successfully complete the refresher course of an environmental training program at least once every three years. Evidence of successful completion of each refresher course shall be the date of the course and the instructor's signature on the original record of completion.
 - (C) If the facility has only one trained operator and the trained operator leaves the employ of the facility, the facility shall:
 - (i) notify the District in writing within 30 days of the departure of the trained operator;
 - (ii) obtain certification for a replacement trained operator within 3 months, except that a trained operator who owns or manages multiple facilities may serve as the interim trained operator at two of those facilities simultaneously for a maximum period of 4 months, by which time each facility must have its own trained operator; and
 - (iii) if the District determines that the initial course of an environmental training program is not reasonably available, the District may extend the certification period for a

replacement trained operator until 1 month after the course is reasonably available.

(f) Water-repelling Operations

No person shall perform water-repelling operations, unless all materials to be treated with perchloroethylene water-repelling solutions are treated in a closed-loop machine.

(g) Reporting Requirements for Facilities with Perchloroethylene Dry Cleaning Systems

(1) Initial Reporting: For an existing facility that is operating dry cleaning equipment, the owner /operator shall submit an initial report by July 1, 2003. For a new facility starting business between the December 6, 2002 and January 1, 2003, the owner /operator shall submit an initial report by January 1, 2007. The initial report shall include all the following information:

- (A) Facility name, AQMD ID number, facility address, owner/operator name, and telephone number;
- (B) The distance from the center of the facility to the property line of the nearest commercial/industrial building, and to the nearest residence;
- (C) Sensitive receptor locations, if they are located within one-quarter of a mile from the center of the facility;
- (D) Annual operating information, for the preceding year, including pounds of clothes cleaned, gallons of solvent purchased, gallons of solvent starting at the beginning of the year, gallons of solvent remaining at the end of the year, gallons of still oil waste, number and type of filter cartridges disposed, and copies of all waste manifests; and
- (E) Equipment original date of purchase or equipment manufacturer date.

(2) Quadrennial Update Reporting: By January 1, 2007 and every four years after that date, the owner/operator shall submit to the Executive Officer an update report including the information specified in paragraph (g)(1).

(h) Recordkeeping for Facilities with Perchloroethylene Dry Cleaning Systems
The owner/operator shall maintain records in accordance with the District's Rule 1421 Recordkeeping/Reporting form. These records or copies thereof, shall be available to the District upon request.

- (1) All of the following records shall be retained for at least 2 years or until the next District inspection of the facility, whichever period is longer.
 - (A) For each dry cleaning machine, a log showing the date and the pounds of materials cleaned per load.
 - (B) Purchase and delivery receipts for perchloroethylene.
For those facilities with solvent tanks that are not directly filled by the perchloroethylene supplier upon delivery, the date(s) and gallons of perchloroethylene added to the solvent tank of each dry cleaning machine.
 - (C) The average facility mileage, determined from all perc additions during the year, as follows:

The Total of the Pounds of Materials Cleaned

The Total of the Gallons of Perchloroethylene Used

- (D) The records or receipts that show the completion of the requirements specified in clauses (e)(1)(A)(iv) and (e)(1)(A)(v).
 - (E) The completed leak inspection checklists required by paragraph (e)(2) and the operation and maintenance checklists required by subparagraph (e)(1)(A).
 - (F) For liquid leaks or vapor leaks that were not repaired at the time of detection, a record of the leaking component(s) of the dry cleaning system awaiting repair and the action(s) taken to complete the repair. The record shall include copies of purchase orders or other written records showing when the repair parts were ordered and/or service was requested.
- (2) For dry cleaning equipment installed after December 9, 1994, the manufacturer's operating manual for all components of the dry cleaning system shall be retained for the life of the equipment.
 - (3) The original record of completion for each trained operator shall be retained during the employment of that person. A copy of the record of

completion shall be retained for an additional period of two years beyond the separation of that person from employment at the facility.

(i) Perchloroethylene Dry Cleaning Equipment Testing

For a given design, a single test program shall be conducted, in accordance with the following procedures, to meet the specifications in paragraphs (d)(2) and (d)(3). The person or organization conducting the test program shall prepare a written test plan that describes, in detail, the dry cleaning machine and control systems being tested, the test protocol, and the test method.

(1) Test Program and Scope. A minimum of three tests shall be conducted for each test program on each control system design. All tests for a single test program shall be conducted on a single dry cleaning machine.

(A) Test results for a primary control system design, or an add-on secondary control system design, may be applied to a different make/model of dry cleaning machine if the equipment designer or facility demonstrates, to the satisfaction of the District, that:

- (i) the test results would be representative of the performance of the control system design on the different make/model of dry cleaning machine; and
- (ii) the control system design is properly sized for the maximum volume of recirculating air in the dry cleaning machine during the drying cycle.

(B) Test results for an integral secondary control system design may not be applied to a different make/model of dry cleaning machine.

(2) Test Conditions. Testing shall be conducted under normal operating conditions, unless otherwise specified.

(A) For primary control systems and secondary control systems, each test shall be conducted during the cleaning of one load of materials.

- (i) The machine shall be filled to no less than 75 percent of its capacity with materials for each test.
- (ii) The weight of materials shall be recorded for each test.

(B) A primary control system shall be tested on a closed-loop machine, or a converted machine, both without a secondary control system.

(C) A secondary control system shall be tested on a closed-loop machine.

- (i) An integral secondary control system shall be tested with the primary control system operating normally.
 - (ii) An add-on secondary control system shall be tested independent of a primary control system and the initial perchloroethylene concentration in the drum shall be 8,600 ppmv or greater.
- (D) For a control system on the exhaust of a drying cabinet, each test shall be conducted following the placement of materials cleaned with perchloroethylene in the drying cabinet. The materials shall be transferred to the drying cabinet and testing shall begin no later than 15 minutes after the end of the washing and extraction process.
 - (i) The drying cabinet shall be filled to no less than 50 percent of its capacity with materials for each test.
 - (ii) The weight of materials shall be recorded for each test.
- (3) Test Method. Equipment shall be tested in accordance with the following methods.
 - (A) For primary control systems and secondary control systems:
 - (i) the temperature of the air in the drum shall be measured and recorded continuously during the entire drying cycle, including the operation of the secondary control system;
 - (ii) sampling shall be conducted as follows:
 - (I) for primary control systems and integral secondary control systems, sampling shall begin at the end of the drying cycle and be completed within 5 minutes;
 - (II) for add-on secondary control systems, sampling shall be done when the concentration of perchloroethylene is 8,600 ppmv or greater and again when the concentration reaches 300 ppmv or less; and
 - (III) sampling shall be completed prior to the opening of the machine door and activation of any fugitive control system.
 - (iii) The perchloroethylene concentration in the drum shall be determined by one of the following methods:
 - (I) A sampling port and valve shall be appropriately placed to draw a sample from the interior of the

drum or the lint filter housing. The sampling port shall be connected to a gas chromatograph by one-quarter (1/4) inch, outside diameter, Teflon tubing. Any sampling pump shall have Teflon diaphragms. The gas chromatograph shall measure the concentrations of perchloroethylene in accordance with ARB Method 422 (17 CCR, Section 94132, December 31, 1991) or NIOSH Method 1003 (NIOSH Manual of Analytical Methods, U.S. Department of Health and Human Services, August 15, 1987).

- (II) A sampling port and valve shall be appropriately placed to draw a sample from the interior of the drum or the lint filter housing. The sampling port shall be connected by one-quarter (1/4) inch outside diameter Teflon tubing to a Tedlar bag. Any sampling pump shall have Teflon diaphragms. The concentration of perchloroethylene in the air sampled shall be measured in accordance with ARB Method 422 (17 CCR, Section 94132, December 31, 1991) or NIOSH Method 1003 (NIOSH Manual of Analytical Methods, U.S. Department of Health and Human Services, August 15, 1987) within 24 hours of sampling. If an independent laboratory is contracted to perform the analysis of the samples, the chain of custody procedures contained in ARB Method 422 or NIOSH Method 1003 shall be followed.
- (B) For a control device on the exhaust of a drying cabinet, sampling and analysis shall be conducted using ARB Method 422 (17 CCR, Section 94132, December 31, 1991) or NIOSH Method 1003 (NIOSH Manual of Analytical Methods, U.S. Department of Health and Human Services, August 15, 1987).
- (C) An alternative test method deemed acceptable by the Executive Officer of the District and the Executive Officer of the Air Resources Board.

- (4) All test plans and test results shall be made available to the District and the Executive Officer of the California Air Resources Board upon request.

- (j) Major Sources
All major sources must comply with the requirements of 40 CFR Section 63.320, *et. seq.*

- (k) Severability, Effect of Judicial Order
In the event that any portion of this rule is held by judicial order to be invalid, such order shall not affect the validity of the remaining portions of this rule.

**Emission Inventory and Risk Assessment Guidelines
for Perchloroethylene Dry Cleaners**

Introduction

The purpose of this report is to document the methods used by AQMD staff to estimate cancer risks from the industry-wide source category of perchloroethylene dry cleaners. The methods are consistent with (1) AQMD's risk assessment procedures for Rule 1401 and (2) California Air Pollution Control Officer Association (CAPCOA) risk assessment guidance for perchloroethylene dry cleaners. The methods used to estimate emissions, pollutant concentrations, and cancer risks are covered here. Tables of maximum cancer risks at various locations in the South Coast Air Basin and at various residential and occupational distances are provided. The document concludes with an example calculation using the cancer risk tables.

Perchloroethylene Dry Cleaners

Rule 1421 was initially adopted in 1994, and amended on December 6, 2002. It is designed to reduce perchloroethylene emissions from dry cleaning systems. As part of reporting requirements in the amendments, the AQMD required an initial survey form, due July 1, 2003, to obtain throughput and receptor information for estimating health risks from dry cleaning facilities. The rule also does not allow usage of perchloroethylene after December 31, 2020.

Perchloroethylene emissions from dry cleaners primarily originate from leaks and from the loading door and other maintenance ports. Emissions are estimated by a material mass balance calculation as follows:

$$\text{Perc Emissions} = \text{Perc Consumption} - \text{Perc Waste Credit}$$

where,

$$\text{Perc Consumption} = \text{Perc Purchases} + \text{Initial Perc Inventory} - \text{Final Perc Inventory}$$

and

$$\text{Perc Waste Credit} = (\text{Total Gallons of Still Oil}) \cdot (\% \text{ Perc in Still Oil}) + (\text{No. of Filter Cartridges}) \cdot (\text{Gallons of Perc/Cartridge})$$

Rule 1421 requires that facilities provide the information needed to perform the above calculations. However, if the above information is not available, then emissions can alternately be calculated as follows:

$$\text{Perc Emissions} = (0.56)(\text{Perc Purchases})$$

The 56 percent fraction given in the above equation was developed based on testing of 41 dry cleaners.

Exposure Modeling Methods

Air quality modeling was performed using a U.S. EPA air quality dispersion model, called ISCST3 (Industrial Source Complex – Short Term, Version 3). ISCST3 is a Gaussian plume model capable of estimating pollutant concentrations from a wide variety of sources that are typically present in an industrial source complex. Emission sources are categorized into four basic types: point, area, volume, and open pit sources. ISCST3 estimates hourly concentrations for each source/receptor pair and calculates concentrations for user-specified averaging times, including an average concentration for the complete simulation period.

ISCST3 is executed using the urban dispersion parameters, which is AQMD policy for all permitting in its jurisdiction. The U.S. EPA regulatory defaults options are implemented except that the calm processing option is disabled. The AQMD believes that calm processing is inappropriate for its meteorological data for the following reasons:

- Calm processing was developed by the U.S. EPA to correct problems with preprocessed data in which calm winds are given the speed of 1 m/s and the direction of the last non-calm hour. This results in artificial persistence. Wind data collected by the AQMD is not preprocessed.
- Wind speeds in the AQMD stations are always 1 m/s or greater. Thus, model problems associated with lower wind speeds are not an issue.
- Wind direction is always recorded regardless of the wind speed and the direction is randomized over a 22.5 degree sector. Thus, artificial persistence is not an issue.
- AQMD data is more like on-site data and calm processing is not appropriate for on-site data.
- Given the high frequency of calms at many sites in the South Coast Air Basin and their association with high pollutant concentrations, it would be inappropriate to eliminate that portion of the data.

For these reasons, the AQMD does not require calm processing for permit modeling.

Emissions from perchloroethylene dry cleaners are non-buoyant and ground-based (or nearly ground-based). In addition, the peak impacts from this type of facility occur in close proximity to the source. Under these circumstances the local terrain is relatively unimportant; therefore flat terrain is assumed in the dispersion modeling.

Modeling was performed at all 35 AQMD meteorological stations shown in Figure 1. The locations of each of the sites are given in Table 1. The data are available on the AQMD website (<http://www.aqmd.gov/smog/metdata/ISCST3.html>). A polar receptor grid is assumed at ten degree azimuth increments at the following downwind distances: 25, 30, 40, 50, 60, 70, 80, 90, 100, 125, 150, 175, 200, 250, 300, 350, 400, 450, 500, 600, 700, 800, 900, and 1000 meters.

The peak model-predicted impacts at each downwind distance over the 36 azimuth angles are used to develop the health risk tables for perchloroethylene dry cleaners (see Tables 2 through 4).

Figure 1
Meteorological Monitoring Stations in the South Coast Air Basin

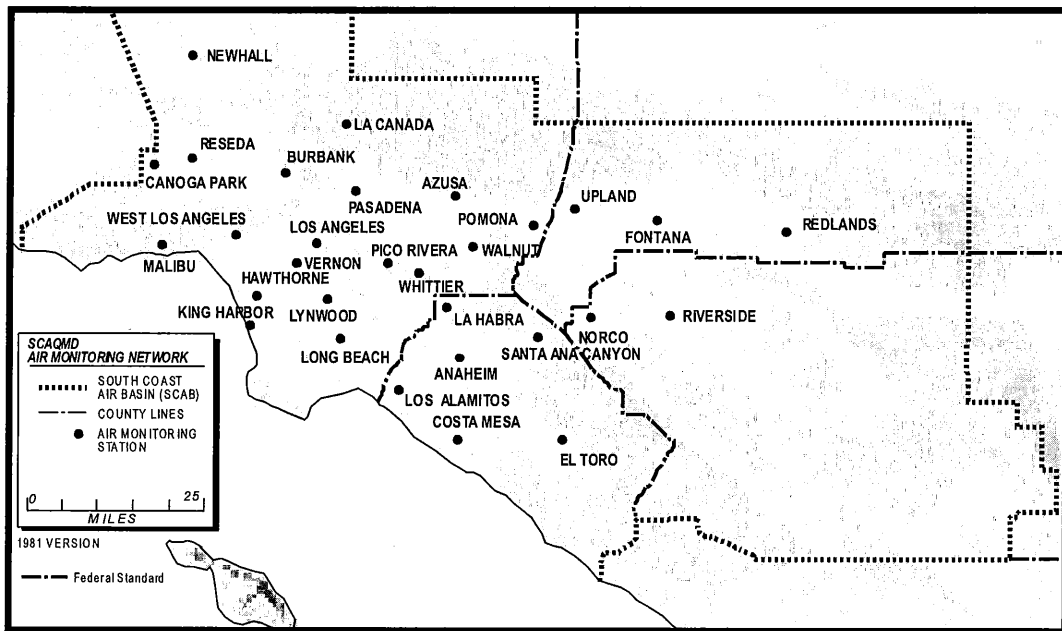


Table 1: Locations of Meteorological Stations

Station name	UTM Coordinates (m)		Lat./Long. Coordinates	
	E-W	N-S	Latitude	Longitude
Anaheim	415.0	3742.5	33°49'16"	117°55'07"
Azusa	414.9	3777.4	34°08'09"	117°55'23"
Banning	510.5	3754.5	33°55'58"	116°53'11"
Burbank	379.5	3783.0	34°10'58"	118°18'27"
Canoga Park	352.9	3786.0	34°12'23"	118°35'48"
Compton	385.5	3750.3	33°53'19"	118°14'17"
Costa Mesa	413.8	3724.2	33°39'21"	117°55'47"
Downtown Los Angeles	386.9	3770.1	34°04'02"	118°13'31"
El Toro	436.0	3720.9	33°37'39"	117°41'25"
Fontana	455.4	3773.9	34°06'24"	117°29'01"
Indio	572.3	3731.0	33°43'06"	116°13'11"
King Harbor	371.2	3744.4	33°50'00"	118°23'30"
La Canada	388.2	3786.1	34°12'42"	118°12'49"
La Habra	412.0	3754.0	33°55'28"	117°57'07"
Lancaster	396.0	3839.5	34°41'38"	118°08'08"
Lennox	373.0	3755.0	33°55'46"	118°22'26"
Long Beach	390.0	3743.0	33°49'24"	118°11'19"
Los Alamitos	404.5	3739.8	33°47'45"	118°01'54"
Lynwood	388.0	3754.0	33°55'20"	118°12'42"
Malibu	344.0	3766.9	34°01'59"	118°41'23"
Newhall	355.5	3805.5	34°22'59"	118°31'02"
Norco	446.8	3749.0	33°52'54"	117°34'31"
Palm Springs	542.5	3742.5	33°49'25"	116°32'27"
Pasadena	396.0	3778.5	34°08'38"	118°07'41"
Pico Rivera	402.3	3764.1	34°00'53"	118°03'29"
Pomona	430.8	3769.6	34°03'60"	117°44'60"
Redlands	486.2	3769.4	34°04'00"	117°09'00"
Reseda	359.0	3785.0	34°11'54"	118°31'49"
Riverside	464.8	3758.6	33°58'10"	117°22'50"
Santa Ana Canyon	431.0	3748.4	33°52'32"	117°44'46"
Upland	440.0	3773.1	34°05'55"	117°39'02"
Vernon	387.4	3762.5	33°59'55"	118°13'10"
Walnut	420.0	3761.7	33°59'41"	117°51'58"
West Los Angeles	372.3	3768.6	34°03'08"	118°23'01"
Whittier	405.3	3754.0	33°55'26"	118°01'28"

As mentioned earlier, CAPCOA has developed industry-wide risk assessment guidelines for perchloroethylene dry cleaners (CAPCOA, 2003). These guidelines were developed to promote consistency throughout the State. However, CAPCOA recognized that many of the districts in the State have developed modeling methods and procedures unique to their situations. To address these differences among districts, CAPCOA allows for a district to deviate from the published guidelines. The modeling performed here followed CAPCOA guidelines unless otherwise noted.

Dry cleaners are modeled as a general ventilation source (CAPCOA, 2003) with one or more large capacity roof fans that ventilate the work place. It is assumed that the vents on the roof are topped by a rain cap or exit horizontally. It is also assumed that 60 percent of the perchloroethylene emissions are captured by the ventilation system and 40 percent of the emissions escape from the building through the doors and windows.

The interior space of the dry cleaner is assumed to be 40 feet (12.2 meters) by 40 feet (12.2 meters) with a ceiling height of 15 feet (4.6 meters). The height of the roof vent is assumed to be 0.5 meters above the roof and the diameter of the vent to be 0.3 meters (12 inches). These dimensions are consistent with assumptions made in the development and amendment of Rule 1421. These building dimensions differ slightly from those assumed by CAPCOA in their modeling guidelines. The building dimensions assumed by CAPCOA are as follows: 15 meters by 15 meters with a height of 6 meters. Building downwash effects are addressed in the modeling with the roof vent located in the center of the building. The facility is assumed to operate the dry cleaning equipment eight hours per day, from 8 a.m. to 4 p.m.; five days per week, from Monday to Friday; and 52 weeks per year.

Beside the building dimensions, CAPCOA modeling guidelines are also not followed for the calculations of the initial vertical dispersion parameter for the volume source. CAPCOA recommends it be estimated as the height of the work space (4.6 meters) divided by 4.3 (i.e., $4.6/4.3 = 1.1$ meters). AQMD follows the ISCST3 guidance for a surface-based volume source, which estimates the initial dispersion parameter by dividing the height of the work space by 2.15 (i.e., $4.6/2.15 = 2.1$ meters). This assumption is consistent with AQMD's permitting practices.

A sample ISCST3 model input file for the generic perchloroethylene dry cleaner described above is given in Exhibit 1.

Exhibit 1: ISCST3 Model Input File for The Generic Perchloroethylene Dry Cleaner

```

CO STARTING
  TITLEONE Dry Cleaner - General Ventilation (60/40) Scenario from R1421
  TITLETWO 100 gal/yr Perc emissions; West Los Angeles meteorology
  MODELOPT NOCALM URBAN CONC
  AVERTIME 1 PERIOD
  POLLUTID Perc
  RUNORNOT RUN

  ERRORFIL ERRORS.OUT
CO FINISHED

SO STARTING

** Assume 100 gal/yr of perc emissions
** Assume 60% general ventilation
** Volume source emissions = 100 (gal/yr)*40%(%Volume)*13.5 lb/gal*(454/(8*5*52*3600))
** Point source emissions = 100 (gal/yr)*60%(%Point) *13.5 lb/gal*(454/(5*8*52*3600))

** Building dimension of 40'x40'x15' (W x L x H)
** Volume source: Sy = 40ft/4.3 ; Sz = 15ft/2.15
** Point source: HS=bulding height+0.5 m; VS=0 m/s(horizontal flow); DS=0.3 m

  LOCATION 1 POINT 0.0 0.0 0.00

** point source QS HS TS VS DS
  SRCPARAM 1 4.907E-2 5.07 293. 0.0 0.30

  LOCATION 2 VOLUME 0.0 0.0 0.0

** Volume Source QS HS SYINIT SZINIT
  SRCPARAM 2 3.271E-2 2.29 2.84 2.13

  BUILDHGT 1 4.57 4.57 4.57 4.57 4.57 4.57
  BUILDHGT 1 4.57 4.57 4.57 4.57 4.57 4.57
  BUILDHGT 1 4.57 4.57 4.57 4.57 4.57 4.57
  BUILDHGT 1 4.57 4.57 4.57 4.57 4.57 4.57
  BUILDHGT 1 4.57 4.57 4.57 4.57 4.57 4.57
  BUILDHGT 1 4.57 4.57 4.57 4.57 4.57 4.57
  BUILDWID 1 14.13 15.64 16.67 17.19 17.19 16.67
  BUILDWID 1 15.64 14.13 12.20 14.13 15.64 16.67
  BUILDWID 1 17.19 17.19 16.67 15.64 14.13 12.20
  BUILDWID 1 14.13 15.64 16.67 17.19 17.19 16.67
  BUILDWID 1 15.64 14.13 12.20 14.13 15.64 16.67
  BUILDWID 1 17.19 17.19 16.67 15.64 14.13 12.20

  EMISFACT 1 HROFDY 8*0.0 8*1.0 8*0.0
  EMISFACT 2 HROFDY 8*0.0 8*1.0 8*0.0

  SRCGROUP ALL
SO FINISHED

RE STARTING
  GRIDPOLR POL1 STA
  ORIG 0.0 0.0
  DIST 25 30 40 50 60 70 80 90 100 125 150 175 200
  DIST 250 300 350 400 450 500 600 700 800 900 1000
  GDIR 36 10.0 10.0
  GRIDPOLR POL1 END
RE FINISHED

```

Exhibit 1: continued.

ME STARTING
INPUTFIL c:\metdata\ascii\wla.asc
ANEMHGHT 10 METERS
SURFDATA 52158 1981
UAIRDATA 91919 1981

DAYRANGE	1	2		5	6	7	8	9		12	13	14	15	16	
DAYRANGE	19	20	21	22	23		26	27	28	29	30		33	34	35
DAYRANGE	36	37		40	41	42	43	44		47	48	49	50	51	
DAYRANGE	54	55	56	57	58		61	62	63	63	65		68	69	70
DAYRANGE	71	72		75	76	77	78	79		82	83	84	85	86	
DAYRANGE	89	90	91	92	93		96	97	98	99	100		103	104	105
DAYRANGE	106	107		110	111	112	113	114		117	118	119	120	121	
DAYRANGE	124	125	126	127	128		131	132	133	134	135		138	139	140
DAYRANGE	141	142		145	146	147	148	149		152	153	154	155	156	
DAYRANGE	159	160	161	162	163		166	167	168	169	170		173	174	175
DAYRANGE	176	177		180	181	182	183	184		187	188	189	190	191	
DAYRANGE	194	195	196	197	198		201	202	203	204	205		208	209	210
DAYRANGE	211	212		215	216	217	218	219		222	223	224	225	226	
DAYRANGE	229	230	231	232	233		236	237	238	239	240		243	244	245
DAYRANGE	246	247		250	251	252	253	254		257	258	259	260	261	
DAYRANGE	264	265	266	267	268		271	272	273	274	275		278	279	280
DAYRANGE	281	282		285	286	287	288	289		292	293	294	295	296	
DAYRANGE	299	300	301	302	303		306	307	308	309	310		313	314	315
DAYRANGE	316	317		320	321	322	323	324		327	328	329	330	331	
DAYRANGE	334	335	336	337	338		341	342	343	344	345		348	349	350
DAYRANGE	351	352		355	356	357	358	359		362	363	364	365		

ME FINISHED

OU STARTING
RECTABLE ALLAVE FIRST

OU FINISHED

Risk Assessment Methods

The risk assessment methods used in the AQMD's *Risk Assessment Procedures for Rule 1401 and 212 (Version 7.0)* are used to calculate the cancer risks and non-cancer chronic hazard index from perchloroethylene dry cleaners. The cancer risk (CR) is calculated as follows:

$$CR = \text{Cancer Potency (CP)} \cdot \text{Dose-Inhalation (DI)} \cdot \text{Multipathway Factor (MP)}$$

where,

$$DI = C_{\text{air}} \cdot \text{DBR} \cdot \text{EVF} \cdot 10^{-6} \cdot \text{MP}$$

$$C_{\text{air}} = C_{\text{ann}} \cdot \text{AF}_{\text{ann}}$$

Therefore, the equation for calculating cancer risks is:

$$CR = \text{CP} \cdot C_{\text{ann}} \cdot \text{AF}_{\text{ann}} \cdot \text{DBR} \cdot \text{EVF} \cdot 10^{-6} \cdot \text{MP}$$

CP is cancer potency in units of $(\text{mg}/\text{kg}\text{-day})^{-1}$. The cancer potency for perchloroethylene is $0.021 (\text{mg}/\text{kg}\text{-day})^{-1}$. C_{ann} is the model-predicted annual average perchloroethylene concentration in $\mu\text{g}/\text{m}^3$. AF_{ann} is a concentration adjustment factor. It adjusts the model-predicted annual average perchloroethylene concentration, which are 24 hrs/day and 7 days/week averages, to an average for the off-site worker exposure period (i.e., 8 hrs/day and 5 days/week). This is necessary because the worker breathing rate of 149 L/kg-day is only applicable to the work-day and work-week exposure. It is assumed that the worker is only exposed while at work. Since the generic perc dry cleaner is assumed to operate 8 hrs/day and 5 days/week, AF_{ann} is assumed to be 4.2 (i.e., $24/8 \cdot 7/5$) for the worker receptors. AF_{ann} is 1 for residential receptors.

DBR is the daily breathing rate in units of L/kg-day. The daily breathing rates for workers and residents are 149 L/kg-day and 302 L/kg-day, respectively. EVF is the exposure value factor, which is assumed to be 0.38 for workers and 0.96 for residents. The multi-pathway adjustment factor (MP) is used for substances that may contribute to risk from exposures other than inhalation. Inhalation is the only pathway into the body for perchloroethylene; therefore, the multi-pathway factor is 1.

The following equation is used to calculate the non-cancer chronic hazard index (HI):

$$\text{Chronic HI} = C_{\text{ann}} / \text{REL}_{\text{perc}}$$

C_{ann} is the model-predicted annual average perchloroethylene concentration in $\mu\text{g}/\text{m}^3$ and REL_{perc} is the chronic reference exposure level for perchloroethylene, which is $35 \mu\text{g}/\text{m}^3$.

Risk Tables

In developing the tables for perchloroethylene dry cleaners, AQMD followed CAPCOA's *Draft Perchloroethylene Dry Cleaner Industry-wide Risk Assessment Guidelines (January 2003)*. For perchloroethylene dry cleaners, emissions were calculated based on consumption information as provided by facility operators in their Initial Survey Form and emission factor developed by AQMD based on results of sampling program conducted by the AQMD. To estimate risk for perchloroethylene dry cleaners; emissions, receptor distances and facility location is used in the lookup tables.

Tables 2 and 3 provide the maximum cancer risks and Table 4 provides chronic hazard index for a perchloroethylene dry cleaner with emissions of 10 gal/yr at various residential and occupational distances, respectively. For the modeled facility, it is assumed that 60 percent of perchloroethylene emissions are captured by the ventilation system and 40 percent of the emissions escape from the building through the doors and windows. The calculated emissions are a function of the perchloroethylene usage.

The modeling results indicate that cancer risk for many of dry cleaners (with high level of emissions and close proximity to receptors) may be in excess of the risk reduction levels established by the AQMD. Results also indicate that the chronic Reference Exposure Levels, or "REL" may be exceeded for some facilities. AQMD followed CAPCOA's *Draft Perchloroethylene Dry Cleaner Industry-wide Risk Assessment Guidelines (January 2003)* and did not address acute exposure in detail since modeling indicates that off-site health risks are dominated by the cancer risk.

Cancer risk and chronic hazard index from a typical perchloroethylene dry cleaner can be estimated from Tables 2, 3, and 4 as follows: First, determine which of the 35 locations in these tables is closest to the dry cleaner or best represents the facility. AQMD staff made use of location information that is available in the AQMD's permit database. The South Coast AQMD is broken up into 38 source/receptor areas as shown in Figure 2. The source/receptor area is provided for each facility in AQMD's permit database. As shown in Table 5, AQMD staff assigned one of the 35 meteorological sites to each source receptor area, which was then used to choose a meteorological site for each drycleaner.

Next, determine the distance from the dry cleaner to the nearest residential and occupational location. Using the above information, pick the cancer risk and chronic hazard index from the appropriate cell in Tables 2, 3, and 4, respectively. Lastly, scale the cancer risk and chronic hazard index by the actual perchloroethylene emissions of the dry cleaner. An example of a risk calculation for a hypothetical perchloroethylene dry cleaner is provided in a subsequent section.

Table 2: Residential Cancer Risks (in one million) for Perchloroethylene Dry Cleaner (Emitting 10 gal/yr)

Location	Downwind Distance (meters)															
	25	30	40	50	60	70	80	90	100	125	150	175	200			
Anaheim	14.63	11.57	7.59	5.24	3.80	2.87	2.24	1.80	1.47	0.96	0.67	0.50	0.38			
Azusa	13.39	10.66	7.00	4.82	3.50	2.65	2.07	1.66	1.36	0.88	0.62	0.46	0.35			
Banning	8.20	6.69	4.53	3.18	2.33	1.77	1.39	1.12	0.92	0.60	0.42	0.31	0.24			
Burbank	10.22	8.01	5.22	3.59	2.61	1.97	1.54	1.23	1.01	0.66	0.46	0.34	0.26			
Canoga Park	12.07	9.43	6.08	4.17	3.02	2.28	1.77	1.42	1.16	0.75	0.53	0.39	0.30			
Compton	10.07	8.12	5.47	3.82	2.80	2.13	1.68	1.35	1.11	0.73	0.51	0.38	0.29			
Costa Mesa	12.25	9.71	6.34	4.36	3.16	2.39	1.86	1.49	1.22	0.79	0.56	0.41	0.32			
Downtown LA	8.02	6.51	4.40	3.09	2.26	1.72	1.35	1.09	0.89	0.58	0.41	0.31	0.24			
El Toro	11.71	9.17	5.90	4.04	2.92	2.20	1.72	1.37	1.12	0.73	0.51	0.38	0.29			
Fontana	13.22	10.54	6.92	4.80	3.50	2.65	2.07	1.66	1.36	0.89	0.62	0.46	0.35			
Indio	11.97	9.50	6.24	4.32	3.14	2.38	1.86	1.49	1.22	0.80	0.56	0.41	0.32			
King Harbor	9.85	7.97	5.33	3.71	2.71	2.06	1.61	1.29	1.06	0.69	0.49	0.36	0.28			
La Canada	12.98	10.25	6.67	4.59	3.32	2.51	1.96	1.57	1.28	0.83	0.58	0.43	0.33			
La Habra	13.79	10.87	7.09	4.88	3.54	2.68	2.09	1.67	1.37	0.89	0.62	0.46	0.35			
Lancaster	8.20	6.47	4.25	2.94	2.14	1.63	1.27	1.02	0.84	0.55	0.38	0.29	0.22			
Lennox	10.87	8.71	5.81	4.05	2.96	2.25	1.76	1.42	1.16	0.76	0.54	0.40	0.31			
Long Beach	10.58	8.29	5.36	3.67	2.66	2.01	1.57	1.25	1.03	0.67	0.47	0.35	0.27			
Los Alamitos	10.52	8.36	5.50	3.80	2.76	2.09	1.63	1.31	1.07	0.70	0.49	0.36	0.28			
Lynwood	10.31	8.16	5.31	3.66	2.65	2.00	1.56	1.25	1.02	0.67	0.47	0.35	0.27			
Malibu	15.06	11.90	7.75	5.33	3.86	2.92	2.27	1.82	1.49	0.97	0.68	0.50	0.38			
Newhall	8.58	6.86	4.53	3.14	2.29	1.73	1.35	1.09	0.89	0.58	0.41	0.30	0.23			
Norco	12.60	10.00	6.59	4.56	3.32	2.52	1.97	1.58	1.29	0.84	0.59	0.44	0.34			
Palm Springs	10.26	8.06	5.19	3.55	2.56	1.93	1.50	1.20	0.98	0.64	0.44	0.33	0.25			
Pasadena	13.55	10.57	6.82	4.67	3.38	2.55	1.99	1.59	1.30	0.85	0.59	0.44	0.34			
Pico Rivera	11.62	9.34	6.21	4.31	3.14	2.38	1.86	1.49	1.22	0.80	0.56	0.42	0.32			
Pomona	15.32	12.06	7.85	5.41	3.93	2.97	2.31	1.85	1.52	0.99	0.69	0.51	0.39			
Redlands	15.48	12.17	7.91	5.45	3.96	2.99	2.33	1.87	1.53	0.99	0.70	0.51	0.39			
Reseda	12.60	9.90	6.37	4.35	3.14	2.37	1.84	1.47	1.20	0.78	0.54	0.40	0.31			
Riverside	13.12	10.63	7.11	4.98	3.64	2.76	2.16	1.74	1.43	0.93	0.66	0.49	0.38			
Santa Ana Canyon	15.79	12.52	8.14	5.61	4.07	3.07	2.40	1.92	1.57	1.02	0.72	0.53	0.41			
Upland	10.37	8.23	5.42	3.75	2.72	2.06	1.61	1.29	1.06	0.69	0.48	0.36	0.27			
Vernon	8.27	6.73	4.59	3.23	2.37	1.81	1.42	1.15	0.94	0.62	0.44	0.33	0.25			
Walnut	10.63	8.37	5.46	3.77	2.74	2.07	1.61	1.29	1.06	0.69	0.48	0.36	0.27			
West LA	17.35	13.83	9.07	6.25	4.53	3.43	2.67	2.14	1.75	1.14	0.80	0.59	0.46			
Whittier	11.76	9.17	5.91	4.05	2.93	2.21	1.72	1.38	1.12	0.73	0.51	0.38	0.29			

Table 2(Cont.): Residential Cancer Risks (in one million) for Perchloroethylene Dry Cleaner (Emitting 10 gal/yr)

Location	Downwind Distance (meters)										
	250	300	350	400	450	500	600	700	800	900	1000
Anaheim	0.24	0.17	0.12	0.10	0.08	0.06	0.04	0.03	0.02	0.02	0.02
Azusa	0.23	0.16	0.12	0.09	0.07	0.06	0.04	0.03	0.02	0.02	0.01
Banning	0.16	0.11	0.08	0.06	0.05	0.04	0.03	0.02	0.02	0.01	0.01
Burbank	0.17	0.12	0.09	0.07	0.05	0.04	0.03	0.02	0.02	0.01	0.01
Canoga Park	0.19	0.13	0.10	0.07	0.06	0.05	0.03	0.02	0.02	0.01	0.01
Compton	0.19	0.13	0.10	0.08	0.06	0.05	0.03	0.03	0.02	0.02	0.01
Costa Mesa	0.20	0.14	0.10	0.08	0.06	0.05	0.03	0.03	0.02	0.02	0.01
Downtown LA	0.15	0.11	0.08	0.06	0.05	0.04	0.03	0.02	0.02	0.01	0.01
El Toro	0.19	0.13	0.09	0.07	0.06	0.05	0.03	0.02	0.02	0.01	0.01
Fontana	0.23	0.16	0.12	0.09	0.07	0.06	0.04	0.03	0.02	0.02	0.01
Indio	0.21	0.14	0.11	0.08	0.06	0.05	0.04	0.03	0.02	0.02	0.01
King Harbor	0.18	0.13	0.09	0.07	0.06	0.05	0.03	0.02	0.02	0.01	0.01
La Canada	0.21	0.15	0.11	0.08	0.07	0.05	0.04	0.03	0.02	0.02	0.01
La Habra	0.23	0.16	0.12	0.09	0.07	0.06	0.04	0.03	0.02	0.02	0.01
Lancaster	0.14	0.10	0.07	0.06	0.04	0.04	0.03	0.02	0.01	0.01	0.01
Lennox	0.20	0.14	0.10	0.08	0.06	0.05	0.04	0.03	0.02	0.02	0.01
Long Beach	0.17	0.12	0.09	0.07	0.05	0.04	0.03	0.02	0.02	0.01	0.01
Los Alamitos	0.18	0.12	0.09	0.07	0.06	0.04	0.03	0.02	0.02	0.01	0.01
Lynwood	0.17	0.12	0.09	0.07	0.05	0.04	0.03	0.02	0.02	0.01	0.01
Malibu	0.25	0.17	0.13	0.10	0.08	0.06	0.04	0.03	0.02	0.02	0.02
Newhall	0.15	0.10	0.08	0.06	0.05	0.04	0.03	0.02	0.01	0.01	0.01
Norco	0.22	0.15	0.11	0.09	0.07	0.06	0.04	0.03	0.02	0.02	0.01
Palm Springs	0.16	0.11	0.08	0.06	0.05	0.04	0.03	0.02	0.02	0.01	0.01
Pasadena	0.22	0.15	0.11	0.08	0.07	0.05	0.04	0.03	0.02	0.02	0.01
Pico Rivera	0.21	0.14	0.11	0.08	0.06	0.05	0.04	0.03	0.02	0.02	0.01
Pomona	0.25	0.17	0.13	0.10	0.08	0.06	0.04	0.03	0.02	0.02	0.02
Redlands	0.25	0.18	0.13	0.10	0.08	0.06	0.04	0.03	0.02	0.02	0.02
Reseda	0.20	0.14	0.10	0.08	0.06	0.05	0.03	0.02	0.02	0.01	0.01
Riverside	0.24	0.17	0.13	0.10	0.08	0.06	0.04	0.03	0.02	0.02	0.02
Santa Ana Canyon	0.26	0.18	0.13	0.10	0.08	0.06	0.04	0.03	0.03	0.02	0.02
Upland	0.18	0.12	0.09	0.07	0.05	0.04	0.03	0.02	0.02	0.01	0.01
Vernon	0.16	0.11	0.09	0.07	0.05	0.04	0.03	0.02	0.02	0.01	0.01
Walnut	0.18	0.12	0.09	0.07	0.05	0.04	0.03	0.02	0.02	0.01	0.01
West LA	0.29	0.20	0.15	0.11	0.09	0.07	0.05	0.04	0.03	0.02	0.02
Whittier	0.19	0.13	0.09	0.07	0.06	0.05	0.03	0.02	0.02	0.01	0.01

Table 3: Occupational Cancer Risks (in one million) for Perchloroethylene Dry Cleaner (Emitting 10 gal/yr)

Location	Downwind Distance (meters)														
	25	30	40	50	60	70	80	90	100	125	150	175	200		
Anaheim	12.13	9.59	6.29	4.34	3.15	2.38	1.86	1.49	1.22	0.79	0.56	0.41	0.32		
Azusa	11.10	8.83	5.80	4.00	2.90	2.19	1.71	1.37	1.12	0.73	0.51	0.38	0.29		
Banning	6.80	5.54	3.76	2.63	1.93	1.47	1.15	0.93	0.76	0.50	0.35	0.26	0.20		
Burbank	8.47	6.64	4.32	2.97	2.16	1.63	1.28	1.02	0.84	0.55	0.38	0.28	0.22		
Canoga Park	10.01	7.82	5.04	3.46	2.50	1.89	1.47	1.18	0.96	0.62	0.44	0.32	0.25		
Compton	8.35	6.73	4.53	3.17	2.32	1.77	1.39	1.12	0.92	0.60	0.42	0.32	0.24		
Costa Mesa	10.16	8.05	5.25	3.62	2.62	1.98	1.54	1.24	1.01	0.66	0.46	0.34	0.26		
Downtown LA	6.65	5.39	3.65	2.56	1.88	1.43	1.12	0.90	0.74	0.48	0.34	0.25	0.20		
El Toro	9.71	7.60	4.89	3.35	2.42	1.83	1.42	1.14	0.93	0.60	0.42	0.31	0.24		
Fontana	10.95	8.73	5.74	3.98	2.90	2.19	1.72	1.38	1.13	0.73	0.52	0.38	0.29		
Indio	9.92	7.87	5.17	3.58	2.61	1.97	1.54	1.24	1.01	0.66	0.46	0.34	0.26		
King Harbor	8.17	6.61	4.42	3.07	2.24	1.70	1.33	1.07	0.88	0.57	0.40	0.30	0.23		
La Canada	10.76	8.49	5.53	3.80	2.75	2.08	1.62	1.30	1.06	0.69	0.48	0.36	0.27		
La Habra	11.43	9.01	5.88	4.05	2.94	2.22	1.73	1.39	1.14	0.74	0.52	0.38	0.29		
Lancaster	6.80	5.36	3.52	2.43	1.78	1.35	1.05	0.85	0.69	0.45	0.32	0.24	0.18		
Lennox	9.01	7.22	4.82	3.35	2.45	1.86	1.46	1.17	0.96	0.63	0.45	0.33	0.25		
Long Beach	8.77	6.87	4.44	3.04	2.20	1.66	1.30	1.04	0.85	0.55	0.39	0.29	0.22		
Los Alamitos	8.72	6.93	4.56	3.15	2.29	1.73	1.35	1.08	0.89	0.58	0.41	0.30	0.23		
Lynwood	8.55	6.76	4.40	3.03	2.20	1.66	1.30	1.04	0.85	0.55	0.39	0.29	0.22		
Malibu	12.48	9.86	6.43	4.42	3.20	2.42	1.88	1.51	1.23	0.80	0.56	0.41	0.32		
Newhall	7.11	5.68	3.76	2.60	1.90	1.44	1.12	0.90	0.74	0.48	0.34	0.25	0.19		
Norco	10.45	8.29	5.46	3.78	2.75	2.09	1.63	1.31	1.07	0.70	0.49	0.36	0.28		
Palm Springs	8.50	6.68	4.30	2.94	2.12	1.60	1.25	1.00	0.81	0.53	0.37	0.27	0.21		
Pasadena	11.23	8.76	5.65	3.87	2.80	2.11	1.65	1.32	1.08	0.70	0.49	0.36	0.28		
Pico Rivera	9.63	7.74	5.15	3.57	2.60	1.97	1.54	1.24	1.01	0.66	0.47	0.34	0.27		
Pomona	12.70	9.99	6.50	4.48	3.25	2.46	1.92	1.54	1.26	0.82	0.57	0.42	0.32		
Redlands	12.83	10.09	6.56	4.52	3.28	2.48	1.93	1.55	1.27	0.82	0.58	0.43	0.33		
Reseda	10.44	8.20	5.28	3.61	2.61	1.96	1.53	1.22	1.00	0.65	0.45	0.33	0.25		
Riverside	10.87	8.81	5.90	4.12	3.01	2.29	1.79	1.44	1.18	0.77	0.55	0.40	0.31		
Santa Ana Canyon	13.09	10.38	6.74	4.65	3.37	2.55	1.99	1.59	1.30	0.85	0.59	0.44	0.34		
Upland	8.59	6.82	4.49	3.11	2.26	1.71	1.33	1.07	0.88	0.57	0.40	0.30	0.23		
Vernon	6.86	5.58	3.80	2.67	1.97	1.50	1.18	0.95	0.78	0.51	0.36	0.27	0.21		
Walnut	8.81	6.94	4.53	3.12	2.27	1.71	1.34	1.07	0.88	0.57	0.40	0.30	0.23		
West LA	14.38	11.47	7.52	5.18	3.76	2.84	2.22	1.78	1.45	0.95	0.66	0.49	0.38		
Whittier	9.74	7.60	4.89	3.36	2.43	1.83	1.43	1.14	0.93	0.61	0.42	0.31	0.24		

Table 3(Cont.): Occupational Cancer Risks (in one million) for Perchloroethylene Dry Cleaner (Emitting 10 gal/yr)

Location	Downwind Distance (meters)										
	250	300	350	400	450	500	600	700	800	900	1000
Anaheim	0.20	0.14	0.10	0.08	0.06	0.05	0.04	0.03	0.02	0.02	0.01
Azusa	0.19	0.13	0.10	0.07	0.06	0.05	0.03	0.02	0.02	0.01	0.01
Banning	0.13	0.09	0.07	0.05	0.04	0.03	0.02	0.02	0.01	0.01	0.01
Burbank	0.14	0.10	0.07	0.05	0.04	0.04	0.02	0.02	0.01	0.01	0.01
Canoga Park	0.16	0.11	0.08	0.06	0.05	0.04	0.03	0.02	0.01	0.01	0.01
Compton	0.16	0.11	0.08	0.06	0.05	0.04	0.03	0.02	0.02	0.01	0.01
Costa Mesa	0.17	0.12	0.09	0.07	0.05	0.04	0.03	0.02	0.02	0.01	0.01
Downtown LA	0.13	0.09	0.07	0.05	0.04	0.03	0.02	0.02	0.01	0.01	0.01
El Toro	0.15	0.11	0.08	0.06	0.05	0.04	0.03	0.02	0.01	0.01	0.01
Fontana	0.19	0.13	0.10	0.07	0.06	0.05	0.03	0.02	0.02	0.01	0.01
Indio	0.17	0.12	0.09	0.07	0.05	0.04	0.03	0.02	0.02	0.01	0.01
King Harbor	0.15	0.10	0.08	0.06	0.05	0.04	0.03	0.02	0.02	0.01	0.01
La Canada	0.18	0.12	0.09	0.07	0.05	0.04	0.03	0.02	0.02	0.01	0.01
La Habra	0.19	0.13	0.10	0.07	0.06	0.05	0.03	0.02	0.02	0.01	0.01
Lancaster	0.12	0.08	0.06	0.05	0.04	0.03	0.02	0.02	0.01	0.01	0.01
Lennox	0.17	0.12	0.09	0.07	0.05	0.04	0.03	0.02	0.02	0.01	0.01
Long Beach	0.14	0.10	0.07	0.06	0.04	0.04	0.02	0.02	0.01	0.01	0.01
Los Alamitos	0.15	0.10	0.08	0.06	0.05	0.04	0.03	0.02	0.01	0.01	0.01
Lynwood	0.14	0.10	0.07	0.06	0.04	0.04	0.02	0.02	0.01	0.01	0.01
Malibu	0.20	0.14	0.10	0.08	0.06	0.05	0.03	0.03	0.02	0.02	0.01
Newhall	0.12	0.09	0.06	0.05	0.04	0.03	0.02	0.02	0.01	0.01	0.01
Norco	0.18	0.13	0.09	0.07	0.06	0.05	0.03	0.02	0.02	0.01	0.01
Palm Springs	0.13	0.09	0.07	0.05	0.04	0.03	0.02	0.02	0.01	0.01	0.01
Pasadena	0.18	0.12	0.09	0.07	0.05	0.04	0.03	0.02	0.02	0.01	0.01
Pico Rivera	0.17	0.12	0.09	0.07	0.05	0.04	0.03	0.02	0.02	0.01	0.01
Pomona	0.21	0.14	0.11	0.08	0.06	0.05	0.04	0.03	0.02	0.02	0.01
Redlands	0.21	0.15	0.11	0.08	0.06	0.05	0.04	0.03	0.02	0.02	0.01
Reseda	0.16	0.11	0.08	0.06	0.05	0.04	0.03	0.02	0.02	0.01	0.01
Riverside	0.20	0.14	0.10	0.08	0.06	0.05	0.04	0.03	0.02	0.02	0.01
Santa Ana Canyon	0.22	0.15	0.11	0.08	0.07	0.05	0.04	0.03	0.02	0.02	0.01
Upland	0.15	0.10	0.07	0.06	0.05	0.04	0.03	0.02	0.01	0.01	0.01
Vernon	0.14	0.10	0.07	0.05	0.04	0.04	0.02	0.02	0.01	0.01	0.01
Walnut	0.15	0.10	0.07	0.06	0.05	0.04	0.03	0.02	0.01	0.01	0.01
West LA	0.24	0.17	0.12	0.09	0.07	0.06	0.04	0.03	0.02	0.02	0.02
Whittier	0.15	0.11	0.08	0.06	0.05	0.04	0.03	0.02	0.01	0.01	0.01

Table 4: Chronic Hazard Index for Perchloroethylene Dry Cleaner (Emitting 10 gal/yr)

Location	Downwind Distance (meters)															
	25	30	40	50	60	70	80	90	100	125	150	175	200			
Anaheim	0.069	0.054	0.036	0.025	0.018	0.013	0.011	0.008	0.007	0.004	0.003	0.002	0.002			
Azusa	0.063	0.050	0.033	0.023	0.016	0.012	0.010	0.008	0.006	0.004	0.003	0.002	0.002			
Banning	0.039	0.031	0.021	0.015	0.011	0.008	0.007	0.005	0.004	0.003	0.002	0.001	0.001			
Burbank	0.048	0.038	0.025	0.017	0.012	0.009	0.007	0.006	0.005	0.003	0.002	0.002	0.001			
Canoga Park	0.057	0.044	0.029	0.020	0.014	0.011	0.008	0.007	0.005	0.004	0.002	0.002	0.001			
Compton	0.047	0.038	0.026	0.018	0.013	0.010	0.008	0.006	0.005	0.003	0.002	0.002	0.001			
Costa Mesa	0.058	0.046	0.030	0.020	0.015	0.011	0.009	0.007	0.006	0.004	0.003	0.002	0.001			
Downtown LA	0.038	0.031	0.021	0.015	0.011	0.008	0.006	0.005	0.004	0.003	0.002	0.001	0.001			
El Toro	0.055	0.043	0.028	0.019	0.014	0.010	0.008	0.006	0.005	0.003	0.002	0.002	0.001			
Fontana	0.062	0.049	0.033	0.023	0.016	0.012	0.010	0.008	0.006	0.004	0.003	0.002	0.002			
Indio	0.056	0.045	0.029	0.020	0.015	0.011	0.009	0.007	0.006	0.004	0.003	0.002	0.001			
King Harbor	0.046	0.037	0.025	0.017	0.013	0.010	0.008	0.006	0.005	0.003	0.002	0.002	0.001			
La Canada	0.061	0.048	0.031	0.022	0.016	0.012	0.009	0.007	0.006	0.004	0.003	0.002	0.002			
La Habra	0.065	0.051	0.033	0.023	0.017	0.013	0.010	0.008	0.006	0.004	0.003	0.002	0.002			
Lancaster	0.039	0.030	0.020	0.014	0.010	0.008	0.006	0.005	0.004	0.003	0.002	0.001	0.001			
Lemoor	0.051	0.041	0.027	0.019	0.014	0.011	0.008	0.007	0.005	0.004	0.003	0.002	0.001			
Long Beach	0.050	0.039	0.025	0.017	0.012	0.009	0.007	0.006	0.005	0.003	0.002	0.002	0.001			
Los Alamitos	0.049	0.039	0.026	0.018	0.013	0.010	0.008	0.006	0.005	0.003	0.002	0.002	0.001			
Lynwood	0.048	0.038	0.025	0.017	0.012	0.009	0.007	0.006	0.005	0.003	0.002	0.002	0.001			
Malibu	0.071	0.056	0.036	0.025	0.018	0.014	0.011	0.009	0.007	0.005	0.003	0.002	0.002			
Newhall	0.040	0.032	0.021	0.015	0.011	0.008	0.006	0.005	0.004	0.003	0.002	0.001	0.001			
Norco	0.059	0.047	0.031	0.021	0.016	0.012	0.009	0.007	0.006	0.004	0.003	0.002	0.002			
Palm Springs	0.048	0.038	0.024	0.017	0.012	0.009	0.007	0.006	0.005	0.003	0.002	0.002	0.001			
Pasadena	0.064	0.050	0.032	0.022	0.016	0.012	0.009	0.007	0.006	0.004	0.003	0.002	0.002			
Pico Rivera	0.055	0.044	0.029	0.020	0.015	0.011	0.009	0.007	0.006	0.004	0.003	0.002	0.002			
Pomona	0.072	0.057	0.037	0.025	0.018	0.014	0.011	0.009	0.007	0.005	0.003	0.002	0.002			
Redlands	0.073	0.057	0.037	0.026	0.019	0.014	0.011	0.009	0.007	0.005	0.003	0.002	0.002			
Reseda	0.059	0.047	0.030	0.020	0.015	0.011	0.009	0.007	0.006	0.004	0.003	0.002	0.001			
Riverside	0.062	0.050	0.033	0.023	0.017	0.013	0.010	0.008	0.007	0.004	0.003	0.002	0.002			
Santa Ana Canyon	0.074	0.059	0.038	0.026	0.019	0.014	0.011	0.009	0.007	0.005	0.003	0.002	0.002			
Upland	0.049	0.039	0.025	0.018	0.013	0.010	0.008	0.006	0.005	0.003	0.002	0.002	0.001			
Vernon	0.039	0.032	0.022	0.015	0.011	0.009	0.007	0.005	0.004	0.003	0.002	0.002	0.001			
Walnut	0.050	0.039	0.026	0.018	0.013	0.010	0.008	0.006	0.005	0.003	0.002	0.002	0.001			
West LA	0.082	0.065	0.043	0.029	0.021	0.016	0.013	0.010	0.008	0.005	0.004	0.003	0.002			
Whittier	0.055	0.043	0.028	0.019	0.014	0.010	0.008	0.006	0.005	0.003	0.002	0.002	0.001			

Table 4(Cont.): Chronic Hazard Index for Perchloroethylene Dry Cleaner (Emitting 10 gal/yr)

Location	Downwind Distance (meters)										
	250	300	350	400	450	500	600	700	800	900	1000
Anaheim	0.001	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Azusa	0.001	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Banning	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Burbank	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Canoga Park	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Compton	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Costa Mesa	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Downtown LA	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
El Toro	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Fontana	0.001	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Indio	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
King Harbor	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
La Canada	0.001	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
La Habra	0.001	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Lancaster	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Lennox	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Long Beach	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Los Alamitos	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Lynwood	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Malibu	0.001	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Newhall	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Norco	0.001	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Palm Springs	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Pasadena	0.001	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Pico Rivera	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Pomona	0.001	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Redlands	0.001	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Reseda	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Riverside	0.001	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Santa Ana Canyon	0.001	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Upland	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Vernon	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Walnut	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
West LA	0.001	0.001	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Whittier	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000

**Figure 2
Source/Receptor Areas**

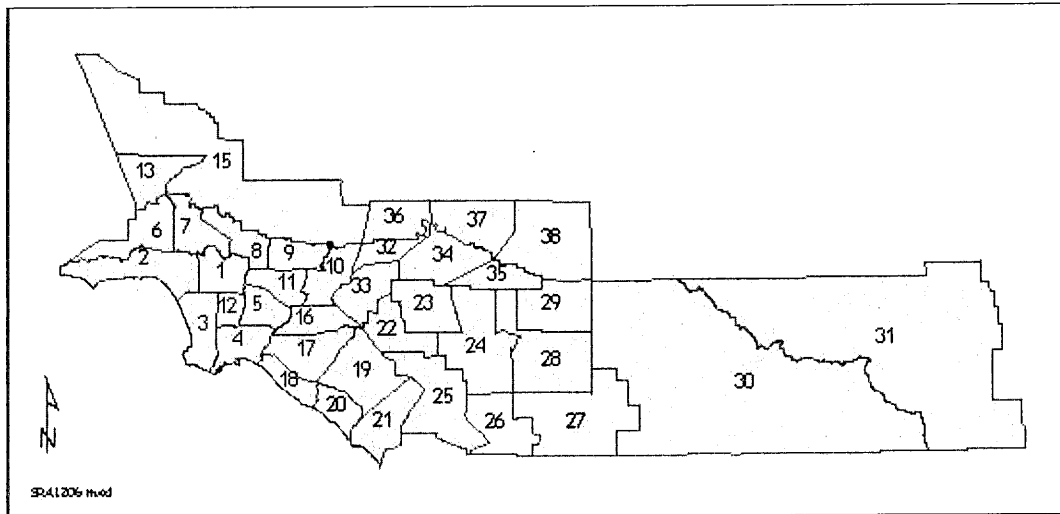


Table 5. Meteorological Stations for Each Source/Receptor Area.

Meteorological Station	Source/ Receptor Area	Meteorological Station	Source/ Receptor Area
Anaheim	17	Newhall	13, 15
Azusa	9	Palm Springs	30, 31
Banning	29	Pasadena	8
Burbank	7	Pico Rivera	11
Costa Mesa	18, 20	Pomona	10
Downtown Los Angeles	1	Redlands	35, 38
El Toro	19, 21	Reseda	6
Fontana	34, 37	Riverside	22-28
La Habra	16	Upland	32, 33, 36
Lennox	3	West Los Angeles	2
Long Beach	4	Whittier	5
Lynwood	12		

Example Calculations

The following example demonstrates how the AQMD staff plans to assign health risk values for perchloroethylene dry cleaning based on information received and using Tables 2 through 4.

The calculation steps are as follows:

1. **Cancer Risk (CR):** The AQMD will assign cancer risk values to each perchloroethylene dry cleaning facility based on facility location, process information, and receptor proximity.
 - a. Residential CR: Use the facility location and the distance to the nearest resident to identify the risk. The residential CRs for perchloroethylene dry cleaning are contained in Table 2.
 - b. Occupational CR: Use the facility location and the distance to the nearest worker to identify the risk. The occupational CRs for perchloroethylene dry cleaning are contained in Table 3.
 - c. Maximum Individual CR (MICR): Select the greater CR between the residential and occupational CRs (as identified above).

2. **Non-Cancer Risk or Hazard Index (HI):** The AQMD will assign non-cancer risk values to each perchloroethylene dry cleaner based on facility location, process information, and receptor proximity. The base chronic hazard indices (CHIs) for perchloroethylene dry cleaning are contained in Table 4.
 - a. Residential HI: Use the facility location and the distance to the nearest resident to identify the risk.
 - b. Occupational HI: Use the facility location and the distance to the nearest worker to identify the risk.
 - c. Highest HI: Select the greater HI between the residential and occupational HIs (as identified above).

Please note the following when calculating risk values for perchloroethylene dry cleaning facilities:

- The perchloroethylene dry cleaning risk tables (Tables 2 thru 4) are based on perchloroethylene emissions of 10 gal/yr. Actual facility perchloroethylene emissions should be multiplied by the values contained in the perchloroethylene dry cleaning risk tables to calculate the appropriate facility risk.
- The AQMD maintains 35 meteorological stations as shown in Figure 1. If there are no meteorological stations in the city of the facility, the closest meteorological station to the facility should be used.
- The perchloroethylene dry cleaning risk tables (Tables 2 thru 4) are based on discrete downwind distances. If the actual downwind distance is not listed in the tables, then linear interpolation between distance cells is acceptable.

Example: A perchloroethylene dry cleaning facility submits the following information: 60 gal/yr perchloroethylene emitted, located in Costa Mesa, nearest

residential receptor 250 meters away, and nearest occupational receptor 25 meters away.

In this example the actual downwind distances are in the tables. However, if the actual downwind distances are not in the table, then linear interpolation between distance cells is acceptable to obtain cancer risks for the actual downwind distances.

1. **Cancer Risk (CR):**

- a. Residential CR: Using Table 2, the base residential cancer risk is 0.20 in one million (250 meters and Costa Mesa) for 10 gal/yr. Since the facility's perchloroethylene emission for this example is 60 gal/yr, the corresponding residential cancer risk is 1.20 in one million.

$$\text{Residential CR (DC)} = \frac{0.20 \text{ in one million}}{(10 \text{ gal/yr})} \times (60 \text{ gal/yr})$$

Residential CR (DC) = 1.2 in one million

- b. Occupational CR: Using Table 3, the base occupational cancer risk is 10.16 in one million (25 meters and Costa Mesa) for 10 gal/yr. Since the facility's perchloroethylene emission for this example is 60 gal/yr, the corresponding occupational cancer risk is 60.96 in one million.

$$\text{Occupational CR (DC)} = \frac{10.16 \text{ in one million}}{(10 \text{ gal/yr})} \times (60 \text{ gal/yr})$$

Occupational CR (DC) = 61.0 in one million

- c. MICR: The MICR for this perchloroethylene dry cleaner is **61.0** in one million (occupational receptor).

2. **Hazard Index (HI):**

- a. Residential HI: Using Table 4, the base residential CHI is 0.001 (250 meters and Costa Mesa) for 10 gal/yr. Since the facility's perchloroethylene emission for this example is 60 gal/yr, the corresponding chronic hazard index is 0.006.

$$\text{Residential CHI (DC)} = \frac{0.001}{(10 \text{ gal/yr})} \times (60 \text{ gal/yr})$$

Residential CHI (DC) = 0.006

- b. Occupational HI: Using Table 4, the base occupational CHI is 0.058 (25 meters and Costa Mesa) for 10 gal/yr. Since the facility's perchloroethylene emission for this example is 60 gal/yr, the corresponding chronic hazard index is 0.35.

$$\text{Occupational CHI (DC)} = \frac{0.058}{(10 \text{ gal/yr})} \times (60 \text{ gal/yr})$$

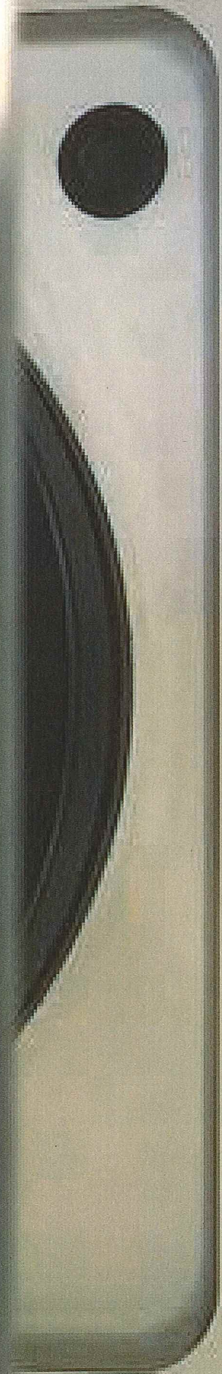
$\text{Occupational CHI (DC)} = 0.35$

- c. *Highest HI:* The **highest** chronic hazard index is **0.35** (occupational receptor).

EXHIBIT D

R - Series

LEWIS®



R - Series

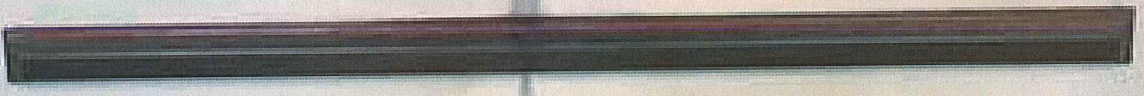


401R



R - Series

LINDY[®]



401R

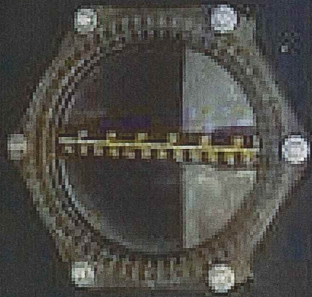










EXHIBIT E

Date 07-19-10

Driver Ruben

Customer Phone 818 761-0129

Consolidated Manifest # 000280297VES

Receipt # 071910-3

TO: MATERIAL RECEIPT		FROM:	
Facility: Veolia ES Technical Solutions L.L.C.	Generator: Coldwater Cleaners	Street: 1704 W. First Street	Street: 4362 Coldwater Canyon Blvd
Destination: Azusa, CA 91702	Origin: Studio City Ca. 91604	Facility EPA # CAD008302903	Generator EPA # CAL000008771
Transporter: Veolia ES Technical Solutions L.L.C.	Transporter EPA # NJD080631369	24 Hour Emergency Response Phone # (877) 818-0087	

# Shipping Units	HM	DOT Proper Shipping Name	gal/lbs (subject to correction)	Rate	Charges
		UN1897, RQ WASTE TETRACHLOROETHYLENE, 6.1, PG III, (F002, D039)(ERG # 160)	708623		
		UN1897, RQ WASTE TETRACHLOROETHYLENE, 6.1, PG III, (F002, D039)(Filters, Debris)(ERG # 160)			
		NA1993, COMBUSTIBLE LIQUID, N.O.S., PG III, (Aliphatic hydrocarbons)(ERG # 128)			
		NONE, NON-RCRA HAZARDOUS WASTE SOLID. (Aliphatic hydrocarbons, Filters, Debris, Diatomaceous earth)			

TO: Product Delivery		FROM:	
Consignee: Coldwater Canyon Cleaners	Shipper: Veolia ES Technical Solutions L.L.C.	Street: 4362 Coldwater Canyon Blvd	Street: 1704 W. First Street
Destination: Studio City, Ca. 91604	Origin: Azusa, CA 91702		

X	UN1897, RQ TETRACHLOROETHYLENE, 6.1, PGIII, ERG #160	Virgin	30	\$21.00	\$630.00
	UN3295, HYDROCARBON LIQUID, N.O.S., PGIII, ERG #128	SST 9.75%			\$61.43
					\$691.43

MSDS

When transporting hazardous materials include the technical or chemical name for n.o.s. (not otherwise specified) or generic description of material with appropriate UN or NA number as defined in US DOT Emergency Communication Standard (HM-2002) provisions.

Remit C.O.D. to:	COD AMT: \$	C.O.D. Fee \$
Address:		Prepaid <input type="checkbox"/> Collect <input type="checkbox"/>
<p>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 _____</p> <p>This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation: _____ (Signature)</p> <p>Subject to Section 7 of the 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)</p>		<p>Total Charges \$</p> <p>Freight Charges</p> <p>Freight prepaid except when marked below. Check Box if charges are to be collect: <input type="checkbox"/></p>

Received, subject to the classifications and lawfully filed tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned and delivered as indicated above which said carrier (the word carrier 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 route, 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 said property, that every service to be performed hereunder shall be subject to all the Bill of Lading terms and conditions in the governing classification on the date of shipment. Shipper hereby certifies that he is familiar with all the Bill of Lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns. NOTICE: Freight moving under this Bill of Lading is subject to the classifications and lawfully filed tariffs in effect on the date of the Bill of Lading. This notice supersedes and negates any claimed, alleged or asserted oral or written contract, promise, representation or understanding between the parties with respect to this freight, except to the extent of any written contract which establishes lawful contract carriage and is signed by authorized representatives of both parties to the contract.

Generator: Coldwater Cleaners	Transporter: Veolia ES Technical Solutions L.L.C.
Print name: M. Deane	Print name: RUBEN RUIZ
Sign name: M. Deane	Sign name: Ruben Ruiz
Date: 07-19-10	Date: 07-19-10



ENVIRONMENTAL SERVICES DRY CLEANERS

Call for Service: (800) 395-6726, Ext. 511

Consolidated Manifest # 00451476VES Receipt # 081711-1A Date 08-17-11

TO: WASTE MATERIAL RECEIPT		FROM:	
Facility: Veolia ES Technical Solutions L.L.C.	Street: 1704 W. First Street	Generator: COLDWATER CLEANERS	Street: 4362 COLDWATER CANYON
Destination: Azusa, CA 91702	Driver-Truck #	Origin: STUDIO CITY, CA 91604	Customer phone # 818-761-0129
Facility EPA # CAD008302903	Transporter: Veolia ES Technical Solutions L.L.C.	Generator EPA # CAR000008771	Transporter EPA # NJD080631369

24 Hour Emergency Response Phone # (877) 818-0087

Shipping Units	HM	D.O.T. PROPER SHIPPING NAME	gal/lbs (subject to correction)	rate
	X	UN1897, RQ, WASTE TETRACHLOROETHYLENE, 6.1, PG III, MARINE POLLUTANT, (F002, D039)(ERG # 160)		
	X	UN1897, RQ, WASTE TETRACHLOROETHYLENE, 6.1, PG III, MARINE POLLUTANT, (F002, D039) Filters, Debris)(ERG # 160)		
	X	NA1993, COMBUSTIBLE LIQUID, N.O.S., PG III, (Aliphatic hydrocarbons)(ERG # 128)		
		NONE, NON-RCRA HAZARDOUS WASTE SOLID (Aliphatic hydrocarbons), (Filters, Debris), (Diatomaceous earth)		

PRODUCT DELIVERY RECEIPT

			gal/lbs	rate
X	UN1897, RQ TETRACHLOROETHYLENE, 6.1, PGIII; MARINE POLLUTANT, ERG # 160	RECYCLED	109	16.50
	SECONDARY CONTAINMENT PALLET		1 pt.	89.95
	CITY OF AZUSA TAX 2 %			5.10
	STATE SALES TAX city and county specific			22.31
	MOS			282.36

BILL TO: FROM:

Jobber:	Shipper: Veolia ES Technical Solutions L.L.C.
Street:	Street: 1704 W. First Street
City:	Origin: Azusa, CA 91702
Account #	

When transporting hazardous materials include the technical or chemical name for n.o.s. (not otherwise specified) or generic description of material with appropriate UN or NA number as defined in US DOT Emergency Communication Standard (HM-308C) Provide

Mail address: Veolia ES Technical Solutions L.L.C. Attn: Dry Cleaners & Automotive Refinishing 107 South Motor Avenue, Azusa, CA 91702-3226	CHECK # 1384	COD AMOUNT \$ 282.36
	CASH	
	CREDIT CARD	

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

This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation: (Signature)

Subject to Section 7 of the 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)

Received, subject to the classifications and lawfully filed tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned and destined as indicated above which said carrier (the word carrier 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 route, 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 of any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the Bill of Lading terms and conditions in the governing classification on the date of shipment. Shipper hereby certifies that he is familiar with all the Bill of Lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns. NOTICE: Freight moving under this Bill of Lading is subject to the classifications and lawfully filed tariffs in effect on the date of the Bill of Lading. This notice supersedes and negates any claimed, alleged or asserted oral or written contract, promise, representation or understanding between the parties with respect to this freight, except to the extent of any written contract which establishes lawful contract carriage and is signed by authorized representatives of both parties to the contract.

Generator: COLDWATER CLEANERS	Transporter: Veolia ES Technical Solutions L.L.C.
Print name: MARY ZENSIR	Print name: KUBRA RAMIREZ
Sign name: [Signature]	Sign name: [Signature]
Date: 08-17-11	Date: 08-17-11

* Hazardous Materials. Mark with "X" to designate hazardous materials as referenced in 40CFR § 172.202.

Agent must detach and retain a copy of this Shipping Order and must sign the Original Bill of Lading.

Revised 03-20-11



ENVIRONMENTAL SERVICES DRY CLEANERS

Call for Service:
(800) 395-6726, Ext. 511

Consolidated Manifest # **000451411 VES**

Receipt # **091211-1**

Date **8-12-11**

TO: WASTE MATERIAL RECEIPT		FROM:
Facility: Veolia ES Technical Solutions L.L.C.	Generator: COLDWATER CLEANERS	
Street: 1704 W. First Street	Street: 4362 COLDWATER CANYON HWY	
Destination: Azusa, CA 91702	Origin: STUDIO CITY CA 91604	
Driver-Truck #	Customer phone # 818 761-0129	
Facility EPA # CAD008302903	Generator EPA # CAR000008771	
Transporter: Veolia ES Technical Solutions L.L.C.	Transporter EPA # NJD080631369	

24 Hour Emergency Response Phone # (877) 818-0087

Shipping Units	HM	D.O.T. PROPER SHIPPING NAME	gal/lbs (subject to correction)	rate	
1	X	UN1897, RQ, WASTE TETRACHLOROETHYLENE, 6.1, PG III, MARINE POLLUTANT, (F002, D039)(ERG # 160)	708623 30	7.50	105.00
	X	UN1897, RQ, WASTE TETRACHLOROETHYLENE, 6.1, PG III, MARINE POLLUTANT, (F002, D039) Filters, Debris)(ERG # 160)			
	X	NA1993, COMBUSTIBLE LIQUID, N.O.S., PG III, (Aliphatic hydrocarbons)(ERG # 128)			
		NONE, NON-RCRA HAZARDOUS WASTE SOLID (Aliphatic hydrocarbons), (Filters, Debris), (Diatomaceous earth)			

PRODUCT DELIVERY RECEIPT

			gal/lbs	rate	
1	X	UN1897, RQ TETRACHLOROETHYLENE, 6.1, PGIII, MARINE POLLUTANT, ERG # 160	Recycled 10	16.50	165.00
		SECONDARY CONTAINMENT PALLET			14.40
1		CITY OF AZUSA TAX 2%		5.40	5.40
1		STATE SALES TAX city and county specific: 8.75 %			14.44

BILL TO: FROM:

Jobber:	Shipper: Veolia ES Technical Solutions L.L.C.
Street:	Street: 1704 W. First Street
City:	Origin: Azusa, CA 91702
Account #	

When transporting hazardous materials include the technical or chemical name for U.S. (not otherwise specified) or generic description of material with appropriate UN or NA number as defined in US DOT Emergency Commission Standard (49CFR 171.16) Provide

Mail address	Veolia ES Technical Solutions L.L.C. Attn: Dry Cleaners & Automotive Refinishing 107 South Motor Avenue, Azusa, CA 91702-3226	CHECK # 1381	COD AMOUNT 289.84
		CASH	
		CREDIT CARD	

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 _____.

This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation: _____ (Signature)

Subject to Section 7 of the 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)

Received, subject to the classifications and lawfully filed tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned and destined as indicated above which said carrier (the word carrier 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 route, 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 said property, that every service to be performed hereunder shall be subject to all the Bill of Lading terms and conditions in the governing or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the Bill of Lading terms and conditions in the governing classification on the date of shipment. Shipper hereby certifies that he is familiar with all the Bill of Lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns. NOTICE: Freight moving under this Bill of Lading is subject to the classifications and lawfully filed tariffs in effect on the date of the Bill of Lading. This notice supersedes and negates any claimed, alleged or asserted oral or written contract, promise, representation or understanding between the parties with respect to this freight, except to the extent of any written contract which establishes lawful contract carriage and is signed by authorized representatives of both parties to the contract.

Generator: COLDWATER CLEANERS	Transporter: Veolia ES Technical Solutions L.L.C.
Print name: MARY ZENJIRYAN	Print name: GARY SHERIDAN
Sign name: <i>[Signature]</i>	Sign name: <i>[Signature]</i>
Date: 8-12-11	Date: 8-12-11

* Hazardous Materials, Mark with "X" to designate hazardous materials as referenced in 40CFR § 172.202.
Agent must detach and retain a copy of this Shipping Order and must sign the Original Bill of Lading. Revised 03-20-11

Generator Name: Rodwater Chemicals EPA ID # CA000000771 Manifest Tracking No. UC045 / 411 WGS

1. If waste is a wastewater (see 40 CFR 268.2) place "w" next to the applicable code(s)

Profile # 706 623

2. CODES WITH SUBCATEGORIES (place appropriate letter from section 8 before each code that applies) (See 40 CFR 268 for details)

- D001 HI-TOC
D001 Except HI-TOC
D003 Reactive Cyanide
D003 Reactive Sulfide
D003 Explosive
D003 Water Reactives
D003 Unexp Ord. Emg
D003 Other Reactives
D006 Batteries
D006 Lead acid batteries
D009 Organic Hg > 260ppm
D009 Inorg. Hg > 260
D009 Hg < 260
F025 Light ends
F025 Spent filter
K006 Hydrated
K006 Anhydrous
K069 Calcium Sulfate
K069 Not Calcium Sulfate
K071 Rmerc Res.
K071 Not Rmerc Res.
K106 Lo Rmerc Res.
K106 Not Rmerc Res.
K106 > 260 ppm Hg
P047 Salts
P047 Nonsalts
P065 Lo Inc. Res.
P065 Hi Inc./RMERC Res.
P065 Not Inc./RMERC Res.
P082 Lo Inc. Res.
P082 Hi Inc./RMERC Res.
P082 Not Inc./RMERC Res.
P082 Lo RMERC Res.
P082 Hi RMERC Res.
P082 Not RMERC Res.
U151 Hi Hg
U240 2, 4 D
U240 2, 4 esters & Salts
U151 Lo RMERC Res.
U151 Lo Not RMERC Res.

The subcategory for D018-D043 waste is "treated in nonCWA/nonSDWA facility" unless the following box is checked: "treated in CWA/SDWA facility"

3. COMMON CODES (Place appropriate letter from section 8 before each code that applies)

- D002 D004 D020 D036 U007
P012 D005 D021 D037 U044
P030 D006 D022 D038 U061
P051 D007 D023 D039 U072
P098 D008 D024 D040 U060
P105 D009 D025 D041 U108
P205 D010 D026 D042 U117
F006 D011 D027 F001
F007 D012 D028 F002
F008 D013 D029 F003
F009 D014 D030 F004
F010 D015 D031 F005
F011 D016 D032 F006
F012 D017 D033 U002
F019 D018 D034 U003
F039 D019 D035 U006
U027 U026 U026 U026
K061

ADDITIONAL CODES (Enter all codes not identified above which are associated with waste)

Table with 3 columns: 4. USEPA HAZARDOUS WASTE CODE(S), 5. TREATMENT STANDARDS FOR NON-PHASE II STATES, 6. HOW MUST THE WASTE BE MANAGED? ENTER THE LETTER FROM BELOW

To identify F039, or UHCs managed in non-CWA, use the "F039/Underlying Hazardous Constituents Form" provided and check here:
If no UHCs are present upon generation check here: Check here if disposal facility will check for all UHCs (i.e. no UHC form required)
To list additional EPA waste code(s), use the supplemental sheet and check here: In lieu of supplemental sheet you may use multiple copies of this form.

7. SOLVENT CONSTITUENTS (F001 - F005) Check here if disposal facility will check for all spent solvents

- Acetone
Carbon Tetrachloride
Cyclohexanone
Ethyl benzene
Methylene chloride
2-Nitropropane
1,1,1 Trichloroethane
Trichloromonofluoromethane
Benzene
Chlorobenzene
o-Dichlorobenzene
Ethyl ether
Methyl ethyl ketone
Pyridine
1, 1, 1, 2-Trichloroethane
Xylenes
n-Butyl alcohol
O-Creol
2-Ethoxyethanol
Isobutanol
Methyl isobutyl ketone
Tetrachloroethylene
1, 1, 2-Trichloro, 1, 2, 2-trifluoroethane
Carbon disulfide
Cresols (m&p)
Ethyl acetate
Methanol
Nitrobenzene
Toluene
Trichloroethylene

8. (States authorized by EPA to manage the LDR program may have regulatory citations different from the 40 CFR citations listed below. Where these regulatory citations differ, your certification will be deemed to refer to those state citations instead of the 40 CFR citations.)

- RESTRICTED WASTE REQUIRES TREATMENT
RESTRICTED WASTE TREATMENT TO PERFORMANCE STANDARDS
GOOD FAITH AND ANALYTICAL CERTIFICATION - FOR INCINERATED ORGANICS
DECHARACTERIZED WASTE REQUIRES TREATMENT FOR UNDERLYING HAZARDOUS CONSTITUENTS
RESTRICTED WASTE SUBJECT TO A VARIANCE
RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT
WASTE NOT CURRENTLY SUBJECT TO PART 268 RESTRICTIONS

I hereby certify that all information in this and all associated documents is complete and accurate, to the best of my knowledge and information.

Signature: [Handwritten Signature]
Title: [Handwritten Title]

Date: 8-12-11

DRY CLEANERS WASTE MATERIAL RECEIPT

Consolidated Manifest # **000595307VES** Receipt # **080912-1** Date **08-09-12**

TO		FROM	
Facility: Veolia ES Technical Solutions L.L.C.	Generator: Coldwater Chemists	Street: 4362 Coldwater Canyon	Origin: Studio City CA 91604
Street: 1704 W. First Street	Customer phone # 818-761-0129	Generator EPA # CAR 000 008771	
Destination: Azusa, CA 91702	Transporter: Veolia ES Technical Solutions L.L.C.	Transporter EPA # NJD080631369	
Driver-Truck # 717772	24 Hour Emergency Response Phone # (877) 818-0087		

Shipping Units	HM	D.O.T. PROPER SHIPPING NAME	gal/lbs (subject to correction)	rate	total
1	X	UN1897, RQ, WASTE TETRACHLOROETHYLENE, 6.1, PG III, MARINE POLLUTANT, (F002, D039)(ERG # 160)	708623 156	3.50	\$52.50
1	X	UN1897, RQ, WASTE TETRACHLOROETHYLENE, 6.1, PG III, MARINE POLLUTANT, (F002, D039)(Filters, Debris)(ERG # 160)	711804 120	1.1600 2.2600	\$68.08
	X	NA1993, COMBUSTIBLE LIQUID, N.O.S., PG III, (Aliphatic hydrocarbons)(ERG # 128)			
		NONE, NON-RCRA HAZARDOUS WASTE SOLID (Aliphatic hydrocarbons), (Filters, Debris), (Diatomaceous earth)			

PRODUCT DELIVERY

Consignee / Bill To:	Shipper: Veolia ES Technical Solutions L.L.C.
Street:	Street: 1704 W. First Street
City:	Origin: Azusa, CA 91702
Reference #	

		gal/lbs	rate	total
X	UN1897, RQ TETRACHLOROETHYLENE, 6.1, PGIII, MARINE POLLUTANT, ERG # 160			
	STATE SALES TAX city and county specific			
1	AZUSA TAX 2%			2.41

When transporting hazardous materials include the technical or chemical name for n.o.s. (not otherwise specified) or general description of material with appropriate UN or NA number as defined in US DOT Emergency Communication Standard (49-126). Provide

MAILING ADDRESS	Veolia ES Technical Solutions L.L.C.	CHECK #	1774 COD AMOUNT \$ 122.91
	Attn: Dry Cleaners & Automotive Refinishing	CASH	
	107 South Motor Avenue, Azusa, CA 91702-3226	CREDIT CARD	

Note - Where the rate is dependant 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 _____

This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation: _____ (Signature)

Subject to Section 7 of the 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)

Received, subject to the classifications and lawfully filed tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned and destined as indicated above which said carrier (the word carrier 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 route, 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 said property, that every service to be performed hereunder shall be subject to all the Bill of Lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns. NOTICE: Freight moving under this Bill of Lading is subject to the classifications and lawfully filed tariffs in effect on the date of the Bill of Lading. This notice supersedes and negates any claimed, alleged or asserted oral or written contract, promise, representation or understanding between the parties with respect to this freight, except to the extent of any written contract which establishes lawful contract carriage and is signed by authorized representatives of both parties to the contract.

Generator: Coldwater Chemists	Transporter: Veolia ES Technical Solutions L.L.C.
Print name: MARY ZENTILAYNA	Print name: _____
Sign name: _____	Sign name: _____
Date: 08-09-12	Date: 08-09-12

Generator Name: Coldwater Chambers EPA ID # CAZ 000008771 Manifest Tracking No. 000595307VES

1. If waste is a wastewater (see 40 CFR 268.2) place "w" next to the applicable code(s) Profile # 708623, 711864

2. CODES WITH SUBCATEGORIES (place appropriate letter from section 8 before each code that applies) (See 40 CFR 268 for details)
- | | | | | |
|--|---|---|---|---|
| <input type="checkbox"/> D001 HI-TOC | <input type="checkbox"/> D008 Lead acid batteries | <input type="checkbox"/> K069 Not Calcium Sulfate | <input type="checkbox"/> P065 Lo RMERC Res. | <input type="checkbox"/> U151 Hi Hg |
| <input type="checkbox"/> D001 Except HI-TOC | <input type="checkbox"/> D009 Organic Hg > 260ppm | <input type="checkbox"/> K071 Rmerc Res. | <input type="checkbox"/> P065 Not Inc./RMERC Res. | <input type="checkbox"/> U240 2, 4 D |
| <input type="checkbox"/> D003 Reactive Cyanide | <input type="checkbox"/> D009 Inorg. Hg > 260 | <input type="checkbox"/> K071 Not Rmerc Res. | <input type="checkbox"/> P065 Hi Inc./RMERC Res. | <input type="checkbox"/> U240 2, 4 esters & Salts |
| <input type="checkbox"/> D003 Reactive Sulfide | <input type="checkbox"/> D009 Hg < 260 | <input type="checkbox"/> K106 Lo Rmerc Res. | <input type="checkbox"/> P092 Lo Inc. Res. | |
| <input type="checkbox"/> D003 Explosive | <input type="checkbox"/> F025 Light ends | <input type="checkbox"/> K106 Not Rmerc Res. | <input type="checkbox"/> P092 Lo RMERC Res. | |
| <input type="checkbox"/> D003 Water Reactives | <input type="checkbox"/> F025 Spent filter | <input type="checkbox"/> K106 > 260 ppm Hg | <input type="checkbox"/> P092 Not Inc./RMERC Res. | |
| <input type="checkbox"/> D003 Unexp Ord. Emg | <input type="checkbox"/> K006 Hydrated | <input type="checkbox"/> P047 Salts | <input type="checkbox"/> P092 Hi Inc./RMERC Res. | |
| <input type="checkbox"/> D003 Other Reactives | <input type="checkbox"/> K006 Anhydrous | <input type="checkbox"/> P047 Nonsalts | <input type="checkbox"/> U151 Lo RMERC Res. | |
| <input type="checkbox"/> D006 Batteries | <input type="checkbox"/> K069 Calcium Sulfate | <input type="checkbox"/> P065 Lo Inc. Res. | <input type="checkbox"/> U151 Lo Not RMERC Res. | |

The subcategory for D018-D043 waste is "treated in nonCWA/nonSDWA facility" unless the following box is checked: "treated in CWA/SDWA facility"

3. COMMON CODES (Place appropriate letter from section 8 before each code that applies)
- | | | | | | | | | | | | | | | | |
|-------------------------------|-------------------------------|-------------------------------|--|-------------------------------|-------------------------------|-------------------------------|-------------------------------|--|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|
| <input type="checkbox"/> D002 | <input type="checkbox"/> P012 | <input type="checkbox"/> P030 | <input type="checkbox"/> P051 | <input type="checkbox"/> P068 | <input type="checkbox"/> P105 | <input type="checkbox"/> P205 | <input type="checkbox"/> F006 | <input type="checkbox"/> F007 | <input type="checkbox"/> F008 | <input type="checkbox"/> F009 | <input type="checkbox"/> F010 | <input type="checkbox"/> F011 | <input type="checkbox"/> F012 | <input type="checkbox"/> F019 | <input type="checkbox"/> F039 |
| <input type="checkbox"/> D004 | <input type="checkbox"/> D005 | <input type="checkbox"/> D006 | <input type="checkbox"/> D007 | <input type="checkbox"/> D008 | <input type="checkbox"/> D009 | <input type="checkbox"/> D010 | <input type="checkbox"/> D011 | <input type="checkbox"/> D012 | <input type="checkbox"/> D013 | <input type="checkbox"/> D014 | <input type="checkbox"/> D015 | <input type="checkbox"/> D016 | <input type="checkbox"/> D017 | <input type="checkbox"/> D018 | <input type="checkbox"/> D019 |
| <input type="checkbox"/> D020 | <input type="checkbox"/> D021 | <input type="checkbox"/> D022 | <input type="checkbox"/> D023 | <input type="checkbox"/> D024 | <input type="checkbox"/> D025 | <input type="checkbox"/> D026 | <input type="checkbox"/> D027 | <input type="checkbox"/> D028 | <input type="checkbox"/> D029 | <input type="checkbox"/> D030 | <input type="checkbox"/> D031 | <input type="checkbox"/> D032 | <input type="checkbox"/> D033 | <input type="checkbox"/> D034 | <input type="checkbox"/> D035 |
| <input type="checkbox"/> D036 | <input type="checkbox"/> D037 | <input type="checkbox"/> D038 | <input checked="" type="checkbox"/> D039 | <input type="checkbox"/> D040 | <input type="checkbox"/> D041 | <input type="checkbox"/> D042 | <input type="checkbox"/> D043 | <input checked="" type="checkbox"/> F001 | <input type="checkbox"/> F002 | <input type="checkbox"/> F003 | <input type="checkbox"/> F004 | <input type="checkbox"/> F005 | <input type="checkbox"/> U002 | <input type="checkbox"/> U003 | <input type="checkbox"/> U006 |
| <input type="checkbox"/> U007 | <input type="checkbox"/> U044 | <input type="checkbox"/> U061 | <input type="checkbox"/> U072 | <input type="checkbox"/> U080 | <input type="checkbox"/> U108 | <input type="checkbox"/> U117 | <input type="checkbox"/> U122 | <input type="checkbox"/> U123 | <input type="checkbox"/> U136 | <input type="checkbox"/> U154 | <input type="checkbox"/> U188 | <input type="checkbox"/> U213 | <input type="checkbox"/> U220 | <input type="checkbox"/> U226 | <input type="checkbox"/> U279 |

ADDITIONAL CODES (Enter all codes not identified above which are associated with waste)

4. USEPA HAZARDOUS WASTE CODE(S)	5. TREATMENT STANDARDS FOR NON-PHASE II STATES (INDICATE THE APPLICABLE TREATMENT STANDARD 268.41, 268.43 OR SPECIFIED TECHNOLOGY BELOW)	6. HOW MUST THE WASTE BE MANAGED? ENTER THE LETTER FROM BELOW

To identify F039, or UHCs managed in non-CWA, use the "F039/Underlying Hazardous Constituents Form" provided and check here:
 If no UHCs are present upon generation check here: Check here if disposal facility will check for all UHCs (i.e. no UHC form required)
 To list additional EPA waste code(s), use the supplemental sheet and check here: In lieu of supplemental sheet you may use multiple copies of this form.

7. SOLVENT CONSTITUENTS (F001 - F005) Check here if disposal facility will check for all spent solvents
- | | | | |
|---|--|---|--|
| <input type="checkbox"/> Acetone | <input type="checkbox"/> Benzene | <input type="checkbox"/> n-Butyl alcohol | <input type="checkbox"/> Carbon disulfide |
| <input type="checkbox"/> Carbon Tetrachloride | <input type="checkbox"/> Chlorobenzene | <input type="checkbox"/> O-Cresol | <input type="checkbox"/> Cresols (m&p) |
| <input type="checkbox"/> Cyclohexanone | <input type="checkbox"/> o-Dichlorobenzene | <input type="checkbox"/> 2-Ethoxyethanol | <input type="checkbox"/> Ethyl acetate |
| <input type="checkbox"/> Ethyl benzene | <input type="checkbox"/> Ethyl ether | <input type="checkbox"/> Isobutanol | <input type="checkbox"/> Methanol |
| <input type="checkbox"/> Methylene chloride | <input type="checkbox"/> Methyl ethyl ketone | <input checked="" type="checkbox"/> Methyl isobutyl ketone | <input type="checkbox"/> Nitrobenzene |
| <input type="checkbox"/> 2-Nitropropane | <input type="checkbox"/> Pyridine | <input checked="" type="checkbox"/> Tetrachloroethylene | <input type="checkbox"/> Toluene |
| <input type="checkbox"/> 1,1,1 Trichloroethane | <input type="checkbox"/> 1, 1, 2-Trichloroethane | <input type="checkbox"/> 1, 1, 2-Trichloro, 1, 2, 2-trifluoroethane | <input type="checkbox"/> Trichloroethylene |
| <input type="checkbox"/> Trichloromonofluoromethane | <input type="checkbox"/> Xylenes | | |

(States authorized by EPA to manage the LDR program may have regulatory citations different from the 40 CFR citations listed below. Where these regulatory citations differ, your certification will be deemed to refer to those state citations instead of the 40 CFR citations.)

- A. RESTRICTED WASTE REQUIRES TREATMENT**
 This waste must be treated to the applicable treatment standards set forth in 40 CFR Part 268.40.
 For Hazardous Debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR 268.45."
- B.1 RESTRICTED WASTE TREATMENT TO PERFORMANCE STANDARDS**
 "I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. 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."
- B.2 (CERTIFICATION REMOVED BY PHASE IV)**
- B.3 GOOD FAITH AND ANALYTICAL CERTIFICATION - FOR INCINERATED ORGANICS**
 "I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by combustion units as specified in 268.42, Table 1. I have been unable to detect the nonwastewater organic constituents, despite having used best good faith efforts to analyze for such constituents. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."
- B.4 DECHARACTERIZED WASTE REQUIRES TREATMENT FOR UNDERLYING HAZARDOUS CONSTITUENTS**
 "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 that require further treatment to meet universal treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."
- C. RESTRICTED WASTE SUBJECT TO A VARIANCE**
 This waste is subject to a national capacity variance, a treatability variance, or a case-by-case extension. Enter the effective date of prohibition in column 5 above.
 For hazardous debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR 268.45."
- D. RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT**
 "I certify under penalty of law that I have personally 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."
- E. WASTE NOT CURRENTLY SUBJECT TO PART 268 RESTRICTIONS**
 This waste is a newly identified waste that is not currently subject to any 40 CFR Part 268 restrictions.

I hereby certify that all information in this and all associated documents is complete and accurate, to the best of my knowledge and information.

Signature MARY ZEMIRY Date 08-09-12
 Title owner
 MANIFEST COPY FORM# VES-78B

DRY CLEANERS WASTE MATERIAL RECEIPT

Consolidated Manifest # 000648381VES Receipt # 091213-1 Date 09-12-13

TO		FROM	
Facility: Veolia ES Technical Solutions L.L.C.	Generator: <u>COLD WATER CLEANERS</u>		
Street: 1704 W. First Street	Street: <u>4362 COLD WATER CANYON</u>		
Destination: Azusa, CA 91702	Origin: <u>STUDIO CITY CA 91604</u>		
Driver-Truck # <u>77772</u>	Customer phone # <u>818-761-0129</u>		
Facility EPA # CAD008302903	Generator EPA # <u>CAR000008771</u>		
Transporter: Veolia ES Technical Solutions L.L.C.		Transporter EPA # NJD080631369	

24 Hour Emergency Response Phone # (877) 818-0087

Shipping Units	HM	D.O.T. PROPER SHIPPING NAME	gal/lbs (subject to correction)	rate	total
1	X	UN1897, RQ, WASTE TETRACHLOROETHYLENE, 6.1, PG III, MARINE POLLUTANT, (F002, D039)(ERG # 160)	<u>708623</u> 259	<u>53.50</u>	<u>587.50</u>
1	X	UN1897, RQ, WASTE TETRACHLOROETHYLENE, 6.1, PG III, MARINE POLLUTANT, (F002, D039) (Filters, Debris)(ERG # 160)	<u>709398</u> (COF.)	<u>1.16⁰⁰ / 1.26⁰⁰</u>	<u>542.00</u>
	X	NA1993, COMBUSTIBLE LIQUID, N.O.S., PG III, (Aliphatic hydrocarbons)(ERG # 128)			
		NONE, NON-RCRA HAZARDOUS WASTE SOLID (Aliphatic hydrocarbons), (Filters, Debris), (Diatomaceous earth)			

PRODUCT DELIVERY

Consignee / Bill To:	Shipper: Veolia ES Technical Solutions L.L.C.
Street:	Street: 1704 W. First Street
City:	Origin: Azusa, CA 91702
Reference #	

			gal/lbs	rate	total
1	X	UN1897, RQ TETRACHLOROETHYLENE, 6.1, PGIII, MARINE POLLUTANT, ERG # 160	<u>Virgin</u> 106	<u>36.00</u>	<u>360.00</u>
1		<u>n.s.o.s</u>			
1		STATE SALES TAX city and county specific		<u>9%</u>	<u>33.05</u>
1		AZUSA TAX 2%			<u>4.79</u>

When transporting hazardous materials include the technical or chemical name for n.o.s. (not otherwise specified) or general description of material with appropriate UN or NA number as defined in US DOT Emergency Communication Standard (HM-1283) Provide

MAILING ADDRESS	Veolia ES Technical Solutions L.L.C.	CHECK #	COD AMOUNT <u>\$532.34</u>
	Attn: Dry Cleaners & Automotive Refinishing	CASH	
	107 South Motor Avenue, Azusa, CA 91702-3226	CREDIT CARD	

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 _____

This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation: _____ (Signature)

Subject to Section 7 of the 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)

Received, subject to the classifications and lawfully filed tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned and destined as indicated above which said carrier (the word carrier 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 route, 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 said property, that every service to be performed hereunder shall be subject to all the Bill of Lading terms and conditions in the governing classification and on the date of shipment. Shipper hereby certifies that he is familiar with all the Bill of Lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns. NOTICE: Freight moving under this Bill of Lading is subject to the classifications and lawfully filed tariffs in effect on the date of the Bill of Lading. This notice supersedes and negates any claimed, alleged or asserted oral or written contract, promise, representation or understanding between the parties with respect to this freight, except to the extent of any written contract which establishes lawful contract carriage and is signed by authorized representatives of both parties to the contract.

Generator: <u>Cold Water Cleaners</u>	Transporter: Veolia ES Technical Solutions L.L.C.
Print name: <u>[Signature]</u>	Print name: <u>Ruben Ramirez</u>
Sign name: _____	Sign name: <u>[Signature]</u>
Date: <u>09-12-13</u>	Date: <u>09-12-13</u>

Generator Name: Coldwater Cleaners EPA ID # CAZ 000 008 771 Manifest Tracking No 000648381VES
 Profile # 708623 70939E

1. If waste is a wastewater (see 40 CFR 268.2) place "w" next to the applicable code(s)
2. CODES WITH SUBCATEGORIES (place appropriate letter from section 8 before each code that applies) (See 40 CFR 268 for details)
- | | | | | |
|--|---|---|---|---|
| <input type="checkbox"/> D001 Hi-TOC | <input type="checkbox"/> D008 Lead acid batteries | <input type="checkbox"/> K069 Not Calcium Sulfate | <input type="checkbox"/> P065 Lo RMERC Res. | <input type="checkbox"/> U151 Hi Hg |
| <input type="checkbox"/> D001 Except Hi-TOC | <input type="checkbox"/> D009 Organic Hg > 260ppm | <input type="checkbox"/> K071 Rmerc Res. | <input type="checkbox"/> P065 Not Inc./RMERC Res. | <input type="checkbox"/> U240 2, 4 D |
| <input type="checkbox"/> D003 Reactive Cyanide | <input type="checkbox"/> D009 Inorg. Hg > 260 | <input type="checkbox"/> K071 Not Rmerc Res. | <input type="checkbox"/> P065 Hi Inc./RMERC Res. | <input type="checkbox"/> U240 2, 4 esters & Salts |
| <input type="checkbox"/> D003 Reactive Sulfide | <input type="checkbox"/> D009 Hg < 260 | <input type="checkbox"/> K106 Lo Rmerc Res. | <input type="checkbox"/> P092 Lo Inc. Res. | |
| <input type="checkbox"/> D003 Explosive | <input type="checkbox"/> F025 Light ends | <input type="checkbox"/> K106 Not Rmerc Res. | <input type="checkbox"/> P092 Lo RMERC Res. | |
| <input type="checkbox"/> D003 Water Reactives | <input type="checkbox"/> F025 Spent filter | <input type="checkbox"/> K106 > 260 ppm Hg | <input type="checkbox"/> P092 Not Inc./RMERC Res. | |
| <input type="checkbox"/> D003 Unexp Ord. Emg | <input type="checkbox"/> K006 Hydrated | <input type="checkbox"/> P047 Salts | <input type="checkbox"/> P092 Hi Inc./RMERC Res. | |
| <input type="checkbox"/> D003 Other Reactives | <input type="checkbox"/> K006 Anhydrous | <input type="checkbox"/> P047 Nonsalts | <input type="checkbox"/> U151 Lo RMERC Res. | |
| <input type="checkbox"/> D006 Batteries | <input type="checkbox"/> K069 Calcium Sulfate | <input type="checkbox"/> P065 Lo Inc. Res. | <input type="checkbox"/> U151 Lo Not RMERC Res. | |
- The subcategory for D018-D043 waste is "treated in nonCWA/nonSDWA facility" unless the following box is checked: "treated in CWA/SDWA facility"

3. COMMON CODES (Place appropriate letter from section 8 before each code that applies)
- | | | | | | | | | | | | | | | | |
|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|
| <input type="checkbox"/> D002 | <input type="checkbox"/> P012 | <input type="checkbox"/> P030 | <input type="checkbox"/> P051 | <input type="checkbox"/> P098 | <input type="checkbox"/> P105 | <input type="checkbox"/> P205 | <input type="checkbox"/> F006 | <input type="checkbox"/> F007 | <input type="checkbox"/> F008 | <input type="checkbox"/> F009 | <input type="checkbox"/> F010 | <input type="checkbox"/> F011 | <input type="checkbox"/> F012 | <input type="checkbox"/> F019 | <input type="checkbox"/> F039 |
| <input type="checkbox"/> D004 | <input type="checkbox"/> D005 | <input type="checkbox"/> D006 | <input type="checkbox"/> D007 | <input type="checkbox"/> D008 | <input type="checkbox"/> D009 | <input type="checkbox"/> D010 | <input type="checkbox"/> D011 | <input type="checkbox"/> D012 | <input type="checkbox"/> D013 | <input type="checkbox"/> D014 | <input type="checkbox"/> D015 | <input type="checkbox"/> D016 | <input type="checkbox"/> D017 | <input type="checkbox"/> D018 | <input type="checkbox"/> D019 |
| <input type="checkbox"/> D020 | <input type="checkbox"/> D021 | <input type="checkbox"/> D022 | <input type="checkbox"/> D023 | <input type="checkbox"/> D024 | <input type="checkbox"/> D025 | <input type="checkbox"/> D026 | <input type="checkbox"/> D027 | <input type="checkbox"/> D028 | <input type="checkbox"/> D029 | <input type="checkbox"/> D030 | <input type="checkbox"/> D031 | <input type="checkbox"/> D032 | <input type="checkbox"/> D033 | <input type="checkbox"/> D034 | <input type="checkbox"/> D035 |
| <input type="checkbox"/> D036 | <input type="checkbox"/> D037 | <input type="checkbox"/> D038 | <input type="checkbox"/> D039 | <input type="checkbox"/> D040 | <input type="checkbox"/> D041 | <input type="checkbox"/> D042 | <input type="checkbox"/> D043 | <input type="checkbox"/> F001 | <input type="checkbox"/> F002 | <input type="checkbox"/> F003 | <input type="checkbox"/> F004 | <input type="checkbox"/> F005 | <input type="checkbox"/> U002 | <input type="checkbox"/> U003 | <input type="checkbox"/> U006 |
| <input type="checkbox"/> U007 | <input type="checkbox"/> U044 | <input type="checkbox"/> U061 | <input type="checkbox"/> U072 | <input type="checkbox"/> U080 | <input type="checkbox"/> U108 | <input type="checkbox"/> U117 | <input type="checkbox"/> U122 | <input type="checkbox"/> U123 | <input type="checkbox"/> U136 | <input type="checkbox"/> U154 | <input type="checkbox"/> U188 | <input type="checkbox"/> U213 | <input type="checkbox"/> U220 | <input type="checkbox"/> U226 | <input type="checkbox"/> U279 |
| | | | | | | | | | | | | | | | <input type="checkbox"/> K061 |

ADDITIONAL CODES (Enter all codes not identified above which are associated with waste)

4. USEPA HAZARDOUS WASTE CODE(S)	5. TREATMENT STANDARDS FOR NON-PHASE II STATES (INDICATE THE APPLICABLE TREATMENT STANDARD 268.41, 268.43 OR SPECIFIED TECHNOLOGY BELOW)	6. HOW MUST THE WASTE BE MANAGED? ENTER THE LETTER FROM BELOW

To identify F039, or UHCs managed in non-CWA, use the "F039/Underlying Hazardous Constituents Form" provided and check here:
 If no UHCs are present upon generation check here: Check here if disposal facility will check for all UHCs (i.e. no UHC form required)
 To list additional EPA waste code(s), use the supplemental sheet and check here: In lieu of supplemental sheet you may use multiple copies of this form.

7. SOLVENT CONSTITUENTS (F001 - F005) Check here if disposal facility will check for all spent solvents
- | | | | |
|---|--|---|--|
| <input type="checkbox"/> Acetone | <input type="checkbox"/> Benzene | <input type="checkbox"/> n-Butyl alcohol | <input type="checkbox"/> Carbon disulfide |
| <input type="checkbox"/> Carbon Tetrachloride | <input type="checkbox"/> Chlorobenzene | <input type="checkbox"/> O-Cresol | <input type="checkbox"/> Cresols (m&p) |
| <input type="checkbox"/> Cyclohexanone | <input type="checkbox"/> o-Dichlorobenzene | <input type="checkbox"/> 2-Ethoxyethanol | <input type="checkbox"/> Ethyl acetate |
| <input type="checkbox"/> Ethyl benzene | <input type="checkbox"/> Ethyl ether | <input type="checkbox"/> Isobutanol | <input type="checkbox"/> Methanol |
| <input type="checkbox"/> Methylene chloride | <input type="checkbox"/> Methyl ethyl ketone | <input type="checkbox"/> Methyl isobutyl ketone | <input type="checkbox"/> Nitrobenzene |
| <input type="checkbox"/> 2-Nitropropane | <input type="checkbox"/> Pyridine | <input type="checkbox"/> Tetrachloroethylene | <input type="checkbox"/> Toluene |
| <input type="checkbox"/> 1,1,1 Trichloroethane | <input type="checkbox"/> 1, 1, 2-Trichloroethane | <input type="checkbox"/> 1, 1, 2-Trichloro, 1, 2, 2-trifluoroethane | <input type="checkbox"/> Trichloroethylene |
| <input type="checkbox"/> Trichloromonofluoromethane | <input type="checkbox"/> Xylenes | | |

8. (States authorized by EPA to manage the LDR program may have regulatory citations different from the 40 CFR citations listed below. Where these regulatory citations differ, your certification will be deemed to refer to those state citations instead of the 40 CFR citations.)
- RESTRICTED WASTE REQUIRES TREATMENT**
 This waste must be treated to the applicable treatment standards set forth in 40 CFR Part 268.40.
 For Hazardous Debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR 268.45."
- B.1 RESTRICTED WASTE TREATMENT TO PERFORMANCE STANDARDS**
 "I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. 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."
- B.2 (CERTIFICATION REMOVED BY PHASE IV)**
- B.3 GOOD FAITH AND ANALYTICAL CERTIFICATION - FOR INCINERATED ORGANICS**
 "I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by combustion units as specified in 268.42, Table 1. I have been unable to detect the nonwastewater organic constituents, despite having used best good faith efforts to analyze for such constituents. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."
- B.4 DECHARACTERIZED WASTE REQUIRES TREATMENT FOR UNDERLYING HAZARDOUS CONSTITUENTS**
 "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 that require further treatment to meet universal treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."
- C. RESTRICTED WASTE SUBJECT TO A VARIANCE**
 This waste is subject to a national capacity variance, a treatability variance, or a case-by-case extension. Enter the effective date of prohibition in column 5 above.
 For hazardous debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR 268.45."
- D. RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT**
 "I certify under penalty of law that I have personally 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."
- E. WASTE NOT CURRENTLY SUBJECT TO PART 268 RESTRICTIONS**
 This waste is a newly identified waste that is not currently subject to any 40 CFR Part 268 restrictions.

I hereby certify that all information in this and all associated documents is complete and accurate, to the best of my knowledge and information.

Signature: [Signature]
 Title: Owner
 Date: 09-12-13

WASTE MATERIAL RECEIPT

Consolidated Manifest # **000982326VES** Receipt # **032615-1** Date **03-26-15**

TO	FROM
Facility: Veolia ES Technical Solutions L.L.C.	Generator: COLD WATER CLEANERS
Street: 1704 W. First Street	Street: 4362 COLDWATER CANYON
Destination: Azusa, CA 91702	Origin: STUDIO CITY, CA 91604
Driver-Truck # 717772	Customer phone # CAR 000 008 771
Facility EPA # CAD008302903	Generator EPA # 818-761-0129
Transporter: Veolia ES Technical Solutions L.L.C.	Transporter EPA # NJD080631369

24 Hour Emergency Response Phone # (877) 818-0087

Shipping Units	HM	D.O.T. PROPER SHIPPING NAME	30 gal drum size gallon/pounds Subject to correction	55 gal drum size gallon/pounds Subject to correction	rate	total
1	X	UN1897, RQ, WASTE TETRACHLOROETHYLENE, 6.1, III, Marine Pollutant, (F002, D039)	255	/	4.40	\$110.00
1	X	UN1897, RQ, WASTE TETRACHLOROETHYLENE, 6.1, III, Marine Pollutant, (F002, D039) (Filters, Debris)	100P.	/	2/29.00	\$58.00
	X	NA1993, COMBUSTIBLE LIQUID, N.O.S., III, (Aliphatic Hydrocarbons)				
	X	NON-RCRA HAZARDOUS WASTE SOLID (Filters, Debris, Diatomaceous Earth containing Aliphatic Hydrocarbons)				

PRODUCT DELIVERY

Consignee / Bill To:	Shipper: Veolia ES Technical Solutions L.L.C.
Street:	Street: 1704 W. First Street
City:	Origin: Azusa, CA 91702
Reference #	

	gal/lbs	rate	total
1 X UN1897, RQ TETRACHLOROETHYLENE, 6.1, III, Marine Pollutant	56	19.95	\$99.75
M.S.D.S			
STATE SALES TAX city and county specific 9%			\$9.16
HAZARDOUS WASTE TAX 2%			\$1.99

When transporting hazardous materials include the technical or chemical name for n.o.s. (not otherwise specified) or generate description of material with appropriate UN or NA number as defined in US DOT Emergency Communication Standard (HM-128C). Provide.

MAILING ADDRESS	Veolia ES Technical Solutions L.L.C.	CHECK #	COD AMOUNT \$ 282.27
	Attn: Dry Cleaners & Automotive Refinishing	CASH	
	107 South Motor Avenue, Azusa, CA 91702-3226	CREDIT CARD	

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 _____

This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation: _____ (Signature)

Subject to Section 7 of the 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)

Received, subject to the classifications and lawfully filed tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned and destined as indicated above which said carrier by the word carrier 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 route, 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 said property, that every service to be performed hereunder shall be subject to all the Bill of Lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns. NOTICE: Freight moving under this Bill of Lading is subject to the classifications and lawfully filed tariffs in effect on the date of the Bill of Lading. This notice supersedes and negates any claimed, alleged or asserted oral or written contract, promise, representation or understanding between the parties with respect to this freight, except to the extent of any written contract which establishes lawful contract carriage and is signed by authorized representatives of both parties to the contract.

Generator: COLDWATER Cleaners	Transporter: Veolia ES Technical Solutions L.L.C.
Print name: ANA ZEMSI	Print name: Roberto Ramirez
Sign name: <i>[Signature]</i>	Sign name: <i>[Signature]</i>
Date: 03-26-15	Date: 03-26-15

Generator Name ADLATER Cleaners EPA ID # CA8000008771 Manifest Tracking No. 000982326VE

1. If waste is a wastewater (see 40 CFR 268.2) place "W" next to the applicable code(s) Profile # 708623, 709398

2. CODES WITH SUBCATEGORIES (place appropriate letter from section 8 before each code that applies) (See 40 CFR 268 for details)

- | | | | | |
|--|---|---|---|---|
| <input type="checkbox"/> D001 Hi-TOC | <input type="checkbox"/> D008 Lead acid batteries | <input type="checkbox"/> K069 Not Calcium Sulfate | <input type="checkbox"/> P065 Lo RMERC Res. | <input type="checkbox"/> U151 Hi Hg |
| <input type="checkbox"/> D001 Except Hi-TOC | <input type="checkbox"/> D009 Organic Hg > 260ppm | <input type="checkbox"/> K071 Rmerc Res. | <input type="checkbox"/> P065 Not Inc./RMERC Res. | <input type="checkbox"/> U240 2, 4 D |
| <input type="checkbox"/> D003 Reactive Cyanide | <input type="checkbox"/> D009 Inorg. Hg > 260 | <input type="checkbox"/> K071 Not Rmerc Res. | <input type="checkbox"/> P065 Hi Inc./RMERC Res. | <input type="checkbox"/> U240 2, 4 esters & Salts |
| <input type="checkbox"/> D003 Reactive Sulfide | <input type="checkbox"/> D009 Hg < 260 | <input type="checkbox"/> K106 Lo Rmerc Res. | <input type="checkbox"/> P092 Lo Inc. Res. | |
| <input type="checkbox"/> D003 Explosive | <input type="checkbox"/> F025 Light ends | <input type="checkbox"/> K106 Not Rmerc Res. | <input type="checkbox"/> P092 Lo RMERC Res. | |
| <input type="checkbox"/> D003 Water Reactives | <input type="checkbox"/> F025 Spent filter | <input type="checkbox"/> K106 > 260 ppm Hg | <input type="checkbox"/> P092 Not Inc./RMERC Res. | |
| <input type="checkbox"/> D003 Unexp Ord. Emg | <input type="checkbox"/> K006 Hydrated | <input type="checkbox"/> P047 Salts | <input type="checkbox"/> P092 Hi Inc./RMERC Res. | |
| <input type="checkbox"/> D003 Other Reactives | <input type="checkbox"/> K006 Anhydrous | <input type="checkbox"/> P047 Nonsalts | <input type="checkbox"/> U151 Lo RMERC Res. | |
| <input type="checkbox"/> D006 Batteries | <input type="checkbox"/> K069 Calcium Sulfate | <input type="checkbox"/> P065 Lo Inc. Res. | <input type="checkbox"/> U151 Lo Not RMERC Res. | |

The subcategory for D018-D043 waste is "treated in nonCWA/nonSDWA facility" unless the following box is checked: "treated in CWA/SDWA facility"

3. COMMON CODES (Place appropriate letter from section 8 before each code that applies)

- | | | | | | | | | | | | | | | | |
|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|
| <input type="checkbox"/> D002 | <input type="checkbox"/> P012 | <input type="checkbox"/> P030 | <input type="checkbox"/> P051 | <input type="checkbox"/> P098 | <input type="checkbox"/> P105 | <input type="checkbox"/> P205 | <input type="checkbox"/> F006 | <input type="checkbox"/> F007 | <input type="checkbox"/> F008 | <input type="checkbox"/> F009 | <input type="checkbox"/> F010 | <input type="checkbox"/> F011 | <input type="checkbox"/> F012 | <input type="checkbox"/> F019 | <input type="checkbox"/> F039 |
| <input type="checkbox"/> D004 | <input type="checkbox"/> D005 | <input type="checkbox"/> D006 | <input type="checkbox"/> D007 | <input type="checkbox"/> D008 | <input type="checkbox"/> D009 | <input type="checkbox"/> D010 | <input type="checkbox"/> D011 | <input type="checkbox"/> D012 | <input type="checkbox"/> D013 | <input type="checkbox"/> D014 | <input type="checkbox"/> D015 | <input type="checkbox"/> D016 | <input type="checkbox"/> D017 | <input type="checkbox"/> D018 | <input type="checkbox"/> D019 |
| <input type="checkbox"/> D020 | <input type="checkbox"/> D021 | <input type="checkbox"/> D022 | <input type="checkbox"/> D023 | <input type="checkbox"/> D024 | <input type="checkbox"/> D025 | <input type="checkbox"/> D026 | <input type="checkbox"/> D027 | <input type="checkbox"/> D028 | <input type="checkbox"/> D029 | <input type="checkbox"/> D030 | <input type="checkbox"/> D031 | <input type="checkbox"/> D032 | <input type="checkbox"/> D033 | <input type="checkbox"/> D034 | <input type="checkbox"/> D035 |
| <input type="checkbox"/> D036 | <input type="checkbox"/> D037 | <input type="checkbox"/> D038 | <input type="checkbox"/> D039 | <input type="checkbox"/> D040 | <input type="checkbox"/> D041 | <input type="checkbox"/> D042 | <input type="checkbox"/> D043 | <input type="checkbox"/> F001 | <input type="checkbox"/> F002 | <input type="checkbox"/> F003 | <input type="checkbox"/> F004 | <input type="checkbox"/> F005 | <input type="checkbox"/> U002 | <input type="checkbox"/> U003 | <input type="checkbox"/> U006 |
| <input type="checkbox"/> U007 | <input type="checkbox"/> U044 | <input type="checkbox"/> U061 | <input type="checkbox"/> U072 | <input type="checkbox"/> U080 | <input type="checkbox"/> U108 | <input type="checkbox"/> U117 | <input type="checkbox"/> U122 | <input type="checkbox"/> U123 | <input type="checkbox"/> U136 | <input type="checkbox"/> U154 | <input type="checkbox"/> U188 | <input type="checkbox"/> U213 | <input type="checkbox"/> U220 | <input type="checkbox"/> U226 | <input type="checkbox"/> U279 |

ADDITIONAL CODES (Enter all codes not identified above which are associated with waste)

4. USEPA HAZARDOUS WASTE CODE(S)	5. TREATMENT STANDARDS FOR NON-PHASE II STATES (INDICATE THE APPLICABLE TREATMENT STANDARD 268.41, 268.43 OR SPECIFIED TECHNOLOGY BELOW)	6. HOW MUST THE WASTE BE MANAGED? ENTER THE LETTER FROM BELOW

To identify F039, or UHCs managed in non-CWA, use the "F039/Underlying Hazardous Constituents Form" provided and check here:
 If no UHCs are present upon generation check here: Check here if disposal facility will check for all UHCs (i.e. no UHC form required)
 To list additional EPA waste code(s), use the supplemental sheet and check here: In lieu of supplemental sheet you may use multiple copies of this form.

7. SOLVENT CONSTITUENTS (F001 - F005) Check here if disposal facility will check for all spent solvents

- | | | | |
|---|--|---|--|
| <input type="checkbox"/> Acetone | <input type="checkbox"/> Benzene | <input type="checkbox"/> n-Butyl alcohol | <input type="checkbox"/> Carbon disulfide |
| <input type="checkbox"/> Carbon Tetrachloride | <input type="checkbox"/> Chlorobenzene | <input type="checkbox"/> O-Cresol | <input type="checkbox"/> Cresols (m&p) |
| <input type="checkbox"/> Cyclohexanone | <input type="checkbox"/> o-Dichlorobenzene | <input type="checkbox"/> 2-Ethoxyethanol | <input type="checkbox"/> Ethyl acetate |
| <input type="checkbox"/> Ethyl benzene | <input type="checkbox"/> Ethyl ether | <input type="checkbox"/> Isobutanol | <input type="checkbox"/> Methanol |
| <input type="checkbox"/> Methylene chloride | <input type="checkbox"/> Methyl ethyl ketone | <input type="checkbox"/> Methyl isobutyl ketone | <input type="checkbox"/> Nitrobenzene |
| <input type="checkbox"/> 2-Nitropropane | <input type="checkbox"/> Pyridine | <input type="checkbox"/> Tetrachloroethylene | <input type="checkbox"/> Toluene |
| <input type="checkbox"/> 1,1,1 Trichloroethane | <input type="checkbox"/> 1, 1, 2-Trichloroethane | <input type="checkbox"/> 1, 1, 2-Trichloro, 1, 2, 2-trifluoroethane | <input type="checkbox"/> Trichloroethylene |
| <input type="checkbox"/> Trichloromonofluoromethane | <input type="checkbox"/> Xylenes | | |

8. (States authorized by EPA to manage the LDR program may have regulatory citations different from the 40 CFR citations listed below. Where these regulatory citations differ, your certification will be deemed to refer to those state citations instead of the 40 CFR citations.)

- A. RESTRICTED WASTE REQUIRES TREATMENT**
 This waste must be treated to the applicable treatment standards set forth in 40 CFR Part 268.40.
 For Hazardous Debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR 268.45."
- B.1 RESTRICTED WASTE TREATMENT TO PERFORMANCE STANDARDS**
 "I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. 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."
- B.2 (CERTIFICATION REMOVED BY PHASE IV)**
- B.3 GOOD FAITH AND ANALYTICAL CERTIFICATION - FOR INCINERATED ORGANICS**
 "I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by combustion units as specified in 268.42, Table 1. I have been unable to detect the nonwastewater organic constituents, despite having used best good faith efforts to analyze for such constituents. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."
- B.4 DECHARACTERIZED WASTE REQUIRES TREATMENT FOR UNDERLYING HAZARDOUS CONSTITUENTS**
 "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 that require further treatment to meet universal treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."
- C. RESTRICTED WASTE SUBJECT TO A VARIANCE**
 This waste is subject to a national capacity variance, a treatability variance, or a case-by-case extension. Enter the effective date of prohibition in column 5 above.
 For hazardous debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR 268.45."
- D. RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT**
 "I certify under penalty of law that I have personally 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."
- E. WASTE NOT CURRENTLY SUBJECT TO PART 268 RESTRICTIONS**
 This waste is a newly identified waste that is not currently subject to any 40 CFR Part 268 restrictions.

I hereby certify that all information in this and all associated documents is complete and accurate, to the best of my knowledge and information.

Signature MARY Zeevy
 Title owner Date 03-26-15

WASTE MATERIAL RECEIPT

Consolidated Manifest # **001037385 VES** Receipt # **110116-1** Date **11-1-16**

TO		FROM	
Facility: Veolia ES Technical Solutions L.L.C.	Street: 1704 W. First Street	Generator: COLDWATER CLEANERS	Street: 4362 COLDWATER CYN AVE
Destination: Azusa, CA 91702	Driver-Truck #	Origin: STUDIO CITY, CA 91604	Customer phone # 818-761-0129
Facility EPA # CAD008302903	Transporter EPA # NJD080631369	Generator EPA # CAR 000 008 771	

24 Hour Emergency Response Phone # (877) 818-0087

Shipping Units	HM	D.O.T. PROPER SHIPPING NAME	30 gal drum size gallon/pounds Subject to correction	55 gal drum size gallon/pounds Subject to correction	rate	total
	X	UN1897, WASTE TETRACHLOROETHYLENE, 6.1, PG III (F002, D039), RQ				
	X	UN 2811, TOXIC SOLIDS, ORGANIC, N.O.S., (Filters, Debris), 6.1 (F002, D039), PG III				
	X	NA1993, COMBUSTIBLE LIQUID, N.O.S., (Aliphatic Hydrocarbons) PG III				
		NON-RCRA HAZARDOUS WASTE SOLID (Filters, Debris contaminated with				

PRODUCT DELIVERY

Consignee / Bill To:	Shipper: Veolia ES Technical Solutions L.L.C.
Street:	Street: 1704 W. First Street
City:	Origin: Azusa, CA 91702
Reference #	

		gal/lbs	rate	total
1	X UN1897, TETRACHLOROETHYLENE, 6.1, PG III, RQ	15 G	21.95	329.25
1	S.O.S.			
	TRANSPORTATION			
1	STATE SALES TAX city and county specific		9%	29.64
1	HAZARDOUS WASTE TAX 2%			7.18

When transporting hazardous materials include the technical or chemical name for N.O.S. (not otherwise specified) or generic description of material with appropriate DOT or NA number as defined in US DOT Emergency Response Guidebook (ERG) (49 CFR) Part 172.

MAILING ADDRESS	Veolia ES Technical Solutions L.L.C.	CHECK # 3645	COD AMOUNT 366.07
	Attn: Dry Cleaners & Automotive Refinishing	CASH	
	107 South Motor Avenue, Azusa, CA 91702-3226	CREDIT CARD	

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 _____
This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation. (Signature)
Subject to Section 7 of the 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)

Received, subject to the classifications and lawfully filed tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned and delivered as indicated above which said carrier (the word carrier 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 route, and 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 said property, that every service to be performed hereunder shall be subject to all the Bill of Lading terms and conditions in the governing classification on the date of shipment. Shipper hereby certifies that he is familiar with all the Bill of Lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assignee. NOTICE: Freight moving under this Bill of Lading is subject to the classifications and lawfully filed tariffs in effect on the date of the Bill of Lading. This notice supersedes and negates any claimed, alleged or asserted oral or written contract, promise, representation or understanding between the parties with respect to the freight, except to the extent of any written contract which establishes lawful contract carriage and is signed by authorized representatives of both parties to the contract.

Generator: COLDWATER CYN CLEANERS	Transporter: Veolia ES Technical Solutions L.L.C.
Print name: MARY ZENTIRYAN	Print name: MICHAEL SOLIZ
Sign name: <i>[Signature]</i>	Sign name: <i>[Signature]</i>
Date: 11-1-16	Date: 11-1-16

PHONE LOG

Date

4-9-18 / 4-11

Time

3:02

New customer

New owner

Service date

Company name

COLDWATER CLEANERS

Address

4362 COLDWATER CANYON AVE

City

STUDIO CITY, CA 91604

Phone numbers

store cell other

818 761 0129

store cell other

818 402 2181

E-mail address

Caller

MARY

Operator

Mgr.

Owner

Call backs

Y A

Confirmed

EPA #

CAR 000 008 771

Inactive

EPA #

WIP # (s)

PL 708623 PF 709398

Debbie ext. 218

Pick-up

started with veolia p/n's

Perc Sale

Virgin perc _____ gals.

Recycled perc _____ gals.

Acetone Sale

Acetone 55 gal. drum _____

30 gal. drum _____

5 gal. jug _____

Cross Streets, Comments

CANT FIND COPIES

FOR ALL OF 2017 / NEEDS

TRANS \$24.

TRANS \$48.

001250368VES 1-18-18

THOSE COPIES

001037282VES 10-5-16

plu

Credit card on file

00103738VES 11-1-16

plu pere.

New credit card

Gabby ext. 261

Tentative pick-up date

2 Hr. time window

Confirmed pick-up date

Reschedule date

ENVIRONMENTAL SERVICES AGREEMENT (Short Form)

This Services Agreement (Agreement), which includes any exhibits attached to it, is made as of the date shown below between CUSTOMER, with offices at 4362 Oldham Canyon, (you, your) and Veolia ES Technical Solutions, L.L.C. ("we", "us", our").

1. SERVICES PROVIDED

We will provide you with analytical, collection, management, transportation, disposal, reclamation and/or recycling services for your waste materials ("Waste Material(s)") described in Waste Profile Sheets ("Profile Sheet(s)"). In addition, we agree that, when you seek the services of a company affiliated with us, we will arrange for that affiliated company to provide those services under the terms and conditions of this Agreement, so long as the affiliated company agrees to be bound by those same terms and conditions. You warrant that the Profile Sheet will contain a true and correct description of your Waste Material and that such Waste Material will conform to this description.

If your Waste Material does not conform to the descriptions in the Profile Sheet ("non-conforming waste"), we can, at our option, return it to you or require you to remove and dispose of the non-conforming waste at your expense, and reimburse us for any expenses we have incurred. In the event we perform services on your premises, you will provide us with a safe workplace, and if we request that work areas be secured, you will be solely responsible for securing such work areas and for preventing anyone other than our personnel from entering the designated work areas.

2. PROVISIONS APPLICABLE TO GENERATORS OF MORE THAN 100 KGS BUT LESS THAN 1000 KGS OF RCRA HAZARDOUS PER CALENDAR MONTH WHOSE WASTES ARE BEING RECLAIMED

The following provisions apply if (a) you are a generator of more than 100 kgs. but less than 1000 kgs. of RCRA hazardous waste in a calendar month and (b) your wastes are transported to us for reclamation and return those reclaimed materials to you.

- A. You and we agree that we will transport your wastes for reclamation to our facility where they will be reclaimed and that we will transport your reclaimed materials back to you, in all cases using our own transportation equipment. When required by law, we will confirm these actions to you in writing, using a consolidated manifest or an equivalent document.
B. You warrant to us that you meet the qualifications of a generator who generates more than 100 kgs but less than 1,000 kgs per calendar month of RCRA hazardous wastes.
C. You warrant that the type of and frequency of pickup of the waste covered by this Paragraph 2 are as set forth below:

Type of Waste: Petroleum Storage Tanks, Filters, etc.
Frequency of Pickups: 6 month

- D. You agree to maintain a copy of this Agreement for at least three (3) years after termination or expiration of the Agreement.
E. You warrant that you have knowledge of the California Consolidated Manifesting Law (California H&S Code 25160.2(c)), and that you meet and comply with all eligibility requirements of this law.
F. You certify that you have established a program to reduce the volume or quantity and toxicity of the hazardous waste to the degree, as determined by you, to be economically practicable

3. INDEMNIFICATION

We agree to indemnify, defend and save you harmless from and against any and all liability which you may be responsible for or pay out as a result of bodily injuries (including death), property damage, or any violation or alleged violation of law, (1) to the extent caused by our breach of this Agreement or any negligent act, negligent omission or willful misconduct of us or our employees, which occurs during the management, collection or transportation of your Waste Materials, or (2) as a result of the disposal of your Waste Materials in a facility owned by us or our affiliated companies, provided that, with regard to both (1) and (2) above, our indemnification obligations will not apply to occurrences involving non-conforming waste.

You agree to indemnify, defend and save us harmless from and against any and all liability which we may be responsible for or pay out as a result of bodily injuries (including death), property damage, or any violation or alleged violation of law to the extent caused by your breach of this Agreement or any warranty you make in this Agreement or by any negligent act, negligent omission or willful misconduct of you or your employees in the performance of this Agreement.

4. FEES

You agree to pay us the fees set forth in Exhibit A or in any pricing document either signed by or otherwise consented to by the parties relating to the work performed by us under this Agreement in accordance with the payment terms of our invoice. You agree to pay interest on any past due amounts at 1-1.2% per month or the maximum rate allowed by law, whichever is less. We may increase our fees from time to time to reflect changes in regulations, taxes, the CPI, disposal fees and fuel prices, plus a reasonable margin. Subject to your approval, the fees may be adjusted for other reasons. We will notify you in writing of fee increases before they go into effect. You can accept fee increases verbally, in writing or by your actions, such as your request for services under this Agreement after being notified of a fee increase.

5. TERM

The term of this Agreement will be for one year from the date below, and will be automatically renewed for successive one-year terms. Either of us may terminate the Agreement by giving the other 30 days' written notice of termination.

6. MISCELLANEOUS

This Agreement will be governed by the laws of the state in which services are performed, and are binding on the successors and assigns of both of us. The warranties and indemnification made by each of us will survive termination of this Agreement. Both parties expressly stipulate that, to the extent allowed by law, any documents contemplated pursuant to this Agreement may be executed and become effective by affixing an electronic signature in the appropriate location and transmitting such electronically signed document to the other party. Such electronic signature shall be deemed to be an original signature and any document bearing an electronic signature shall be deemed to be a valid document bearing a signature affixed by hand.

The prevailing party will be entitled to reasonable attorneys' fees and court costs in any legal action relating to this Agreement which may arise between the parties. This Agreement supersedes any prior Agreements between us for locations and services covered by this Agreement. In the event of a conflict between the terms and conditions appearing on your purchase orders or other form order documents, this service agreement shall govern.

IN NO EVENT SHALL EITHER PARTY BE RESPONSIBLE TO THE OTHER FOR CONSEQUENTIAL, INCIDENTAL, INDIRECT, SPECIAL OR PUNITIVE DAMAGES IN CONNECTION WITH THIS AGREEMENT, WHETHER BASED IN CONTRACT, TORT, STRICT LIABILITY, STATUTE OR OTHERWISE.

IN WITNESS WHEREOF, this Agreement has been signed by the authorized representatives of the parties.

CUSTOMER

Signature: MARY Zengjia Date: 7-17-08
Name: MARY Zengjia

VEOLIA ES TECHNICAL SOLUTIONS L.L.C.

Signature: Mike A. Gilham Date:
Name: Mike A. Gilham

LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM PHASE IV

Generator Name: Columbus Chlor EPA ID # CA00005771 State Manifest No. 000025690VER

1. If waste is a wastewater (see 40 CFR 268.2) place "W" next to the applicable code(s) Profile # 708 708623

2. CODES WITH SUBCATEGORIES (place appropriate letter from section 8 before each code that applies) (See 40 CFR 268 for details)
- | | | | | |
|--|---|---|---|---|
| <input type="checkbox"/> D001 HI-TOC | <input type="checkbox"/> D008 Lead acid batteries | <input type="checkbox"/> K069 Not Calcium Sulfate | <input type="checkbox"/> P065 Lo RMERC Res. | <input type="checkbox"/> U151 HI Hg |
| <input type="checkbox"/> D001 Except HI-TOC | <input type="checkbox"/> D009 Organic Hg > 260ppm | <input type="checkbox"/> K071 Rmerc Res. | <input type="checkbox"/> P065 Not Inc./RMERC Res. | <input type="checkbox"/> U240 2, 4 D |
| <input type="checkbox"/> D003 Reactive Cyanide | <input type="checkbox"/> D009 Inorg. Hg > 260 | <input type="checkbox"/> K071 Not Rmerc Res. | <input type="checkbox"/> P065 HI Inc./RMERC Res. | <input type="checkbox"/> U240 2, 4-esters & Salls |
| <input type="checkbox"/> D003 Reactive Sulfide | <input type="checkbox"/> D009 Hg < 260 | <input type="checkbox"/> K106 Lo Rmerc Res. | <input type="checkbox"/> P092 Lo Inc. Res. | |
| <input type="checkbox"/> D003 Explosive | <input type="checkbox"/> F025 Light ends | <input type="checkbox"/> K106 Not Rmerc Res. | <input type="checkbox"/> P092 Lo RMERC Res. | |
| <input type="checkbox"/> D003 Water Reactives | <input type="checkbox"/> F025 Spent filter | <input type="checkbox"/> K106 > 260 ppm Hg | <input type="checkbox"/> P092 Not Inc./RMERC Res. | |
| <input type="checkbox"/> D003 Unexp Ord. Emg | <input type="checkbox"/> K006 Hydrated | <input type="checkbox"/> P047 Salts | <input type="checkbox"/> P092 HI Inc./RMERC Res. | |
| <input type="checkbox"/> D003 Other Reactives | <input type="checkbox"/> K006 Anhydrous | <input type="checkbox"/> P047 Nonsalts | <input type="checkbox"/> U151 Lo RMERC Res. | |
| <input type="checkbox"/> D006 Batteries | <input type="checkbox"/> K069 Calcium Sulfate | <input type="checkbox"/> P065 Lo Inc. Res. | <input type="checkbox"/> U151 Lo Not RMERC Res. | |

The subcategory for D018-D043 waste is "treated in nonCWA/nonSDWA facility" unless the following box is checked: "treated in CWA/SDWA facility"

3. COMMON CODES (Place appropriate letter from section 8 before each code that applies)
- | | | | | | | | | | | | | | | | |
|-------------------------------|-------------------------------|-------------------------------|--|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|--|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|
| <input type="checkbox"/> D002 | <input type="checkbox"/> P012 | <input type="checkbox"/> P030 | <input type="checkbox"/> P051 | <input type="checkbox"/> P088 | <input type="checkbox"/> P105 | <input type="checkbox"/> P205 | <input type="checkbox"/> F006 | <input type="checkbox"/> F007 | <input type="checkbox"/> F008 | <input type="checkbox"/> F009 | <input type="checkbox"/> F010 | <input type="checkbox"/> F011 | <input type="checkbox"/> F012 | <input type="checkbox"/> F019 | <input type="checkbox"/> F039 |
| <input type="checkbox"/> D004 | <input type="checkbox"/> D005 | <input type="checkbox"/> D006 | <input type="checkbox"/> D007 | <input type="checkbox"/> D008 | <input type="checkbox"/> D009 | <input type="checkbox"/> D010 | <input type="checkbox"/> D011 | <input type="checkbox"/> D012 | <input type="checkbox"/> D013 | <input type="checkbox"/> D014 | <input type="checkbox"/> D015 | <input type="checkbox"/> D016 | <input type="checkbox"/> D017 | <input type="checkbox"/> D018 | <input type="checkbox"/> D019 |
| <input type="checkbox"/> D020 | <input type="checkbox"/> D021 | <input type="checkbox"/> D022 | <input type="checkbox"/> D023 | <input type="checkbox"/> D024 | <input type="checkbox"/> D025 | <input type="checkbox"/> D026 | <input type="checkbox"/> D027 | <input type="checkbox"/> D028 | <input type="checkbox"/> D029 | <input type="checkbox"/> D030 | <input type="checkbox"/> D031 | <input type="checkbox"/> D032 | <input type="checkbox"/> D033 | <input type="checkbox"/> D034 | <input type="checkbox"/> D035 |
| <input type="checkbox"/> D036 | <input type="checkbox"/> D037 | <input type="checkbox"/> D038 | <input checked="" type="checkbox"/> D039 | <input type="checkbox"/> D040 | <input type="checkbox"/> D041 | <input type="checkbox"/> D042 | <input type="checkbox"/> D043 | <input type="checkbox"/> F001 | <input checked="" type="checkbox"/> F002 | <input type="checkbox"/> F003 | <input type="checkbox"/> F004 | <input type="checkbox"/> F005 | <input type="checkbox"/> U002 | <input type="checkbox"/> U003 | <input type="checkbox"/> U006 |
| <input type="checkbox"/> U007 | <input type="checkbox"/> U044 | <input type="checkbox"/> U061 | <input type="checkbox"/> U072 | <input type="checkbox"/> U080 | <input type="checkbox"/> U108 | <input type="checkbox"/> U117 | <input type="checkbox"/> U122 | <input type="checkbox"/> U123 | <input type="checkbox"/> U136 | <input type="checkbox"/> U154 | <input type="checkbox"/> U188 | <input type="checkbox"/> U213 | <input type="checkbox"/> U220 | <input type="checkbox"/> U226 | <input type="checkbox"/> U279 |
| | | | | | | | | | | | | | | | <input type="checkbox"/> K061 |

ADDITIONAL CODES (Enter all codes not identified above which are associated with waste)

4. USEPA HAZARDOUS WASTE CODE(S)	5. TREATMENT STANDARDS FOR NON-PHASE II STATES (INDICATE THE APPLICABLE TREATMENT STANDARD 268.41, 268.43 OR SPECIFIED TECHNOLOGY BELOW)	6. HOW MUST THE WASTE BE MANAGED? ENTER THE LETTER FROM BELOW

To identify F039, or UHCs managed in non-CWA, use the "F039/Underlying Hazardous Constituents Form" provided and check here:
 If no UHCs are present upon generation check here: Check here if disposal facility will check for all UHCs (i.e. no UHC form required)
 To list additional EPA waste code(s), use the supplemental sheet and check here: In lieu of supplemental sheet you may use multiple copies of this form.

7. SOLVENT CONSTITUENTS (F001 - F005) Check here if disposal facility will check for all spent solvents
- | | | | |
|---|--|---|--|
| <input type="checkbox"/> Acetone | <input type="checkbox"/> Benzene | <input type="checkbox"/> n-Butyl alcohol | <input type="checkbox"/> Carbon disulfide |
| <input type="checkbox"/> Carbon Tetrachloride | <input type="checkbox"/> Chlorobenzene | <input type="checkbox"/> O-Cresol | <input type="checkbox"/> Cresols (m&p) |
| <input type="checkbox"/> Cyclohexanone | <input type="checkbox"/> o-Dichlorobenzene | <input type="checkbox"/> 2-Ethoxyethanol | <input type="checkbox"/> Ethyl acetate |
| <input type="checkbox"/> Ethyl benzene | <input type="checkbox"/> Ethyl ether | <input type="checkbox"/> Isobutanol | <input type="checkbox"/> Methanol |
| <input type="checkbox"/> Methylene chloride | <input type="checkbox"/> Methyl ethyl ketone | <input type="checkbox"/> Methyl isobutyl ketone | <input type="checkbox"/> Nitrobenzene |
| <input type="checkbox"/> 2-Nitropropane | <input type="checkbox"/> Pyridine | <input checked="" type="checkbox"/> Tetrachloroethylene | <input type="checkbox"/> Toluene |
| <input type="checkbox"/> 1,1,1 Trichloroethane | <input type="checkbox"/> 1, 1, 2-Trichloroethane | <input type="checkbox"/> 1, 1, 2-Trichloro, 1, 2, 2-trifluoroethane | <input type="checkbox"/> Trichloroethylene |
| <input type="checkbox"/> Trichloromonofluoromethane | <input type="checkbox"/> Xylenes | | |

8. (States authorized by EPA to manage the LDR program may have regulatory citations different from the 40 CFR citations listed below. Where these regulatory citations differ, your certification will be deemed to refer to those state citations instead of the 40 CFR citations.)
- RESTRICTED WASTE REQUIRES TREATMENT**
 This waste must be treated to the applicable treatment standards set forth in 40 CFR Part 268.40.
 For Hazardous Debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR 268.45."
- B.1 RESTRICTED WASTE TREATMENT TO PERFORMANCE STANDARDS**
 "I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. 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."
- B.2 (CERTIFICATION REMOVED BY PHASE IV)**
- B.3 GOOD FAITH AND ANALYTICAL CERTIFICATION - FOR INCINERATED ORGANICS**
 "I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by combustion units as specified in 268.42, Table 1. I have been unable to detect the nonwastewater organic constituents, despite having used best good faith efforts to analyze for such constituents. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."
- B.4 DECHARACTERIZED WASTE REQUIRES TREATMENT FOR UNDERLYING HAZARDOUS CONSTITUENTS**
 "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 that require further treatment to meet universal treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."
- C. RESTRICTED WASTE SUBJECT TO A VARIANCE**
 This waste is subject to a national capacity variance, a treatability variance, or a case-by-case extension. Enter the effective date of prohibition in column 5 above.
 For hazardous debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR 268.45."
- D. RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT**
 "I certify under penalty of law that I have personally 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."
- E. WASTE NOT CURRENTLY SUBJECT TO PART 268 RESTRICTIONS**
 This waste is a newly identified waste that is not currently subject to any 40 CFR Part 268 restrictions.

I hereby certify that all information in this and all associated documents is complete and accurate, to the best of my knowledge and information.

Signature: [Signature]
 Title: [Signature]

Date: 7-17-08

MIKE

WASTE MATERIAL RECEIPT

Consolidated Manifest # 001250368VES Receipt # 011818-2 Date 1-18-18

TO		FROM	
Facility: Veolia ES Technical Solutions L.L.C.	Generator: <u>COLDWATER CLEANERS</u>	Street: <u>4262 COLDWATER CYN AVE</u>	Origin: <u>STUDIO CITY, CA 91604</u>
Street: 1704 W. First Street	Customer phone # <u>818 761 0129</u>	Generator EPA # <u>CAR 000 008 771</u>	Transporter EPA # <u>NJD080631369</u>
Destination: Azusa, CA 91702	24 Hour Emergency Response Phone # (877) 818-0087		
Driver-Truck #			
Facility EPA # <u>CAD008302903</u>			
Transporter: Veolia ES Technical Solutions L.L.C.			

1 FILTER IN LIQUID SPILL

Shipping Units	HM	D.O.T. PROPER SHIPPING NAME	30 gal drum size gallon/pounds Subject to correction	55 gal drum size gallon/pounds Subject to correction	rate	total
	X	UN1897, WASTE TETRACHLOROETHYLENE, 6.1, PG III, (F002, D039), RQ	<u>708623 30G</u>	<u>9.00</u>	<u>270.00</u>	
	X	UN 2811, TOXIC SOLIDS, ORGANIC, N.O.S., (Filters, Debris), 6.1 (F002, D039), PG III	<u>709398 130P</u>	<u>1.25</u>	<u>154.00</u>	
	X	NA1993, COMBUSTIBLE LIQUID, N.O.S., (Aliphatic Hydrocarbons) (Cyclosiloxane) PG III NON-RCRA HAZARDOUS WASTE SOLID (Filters, Debris, Diatomaceous Earth contaminated with				

PRODUCT DELIVERY

Consignee / Bill To:	Shipper: Veolia ES Technical Solutions L.L.C.
Street: 1704 W. First Street	Street: 1704 W. First Street
City: Azusa, CA 91702	Origin: Azusa, CA 91702
Reference #	gal/lbs rate total

X	UN1897, TETRACHLOROETHYLENE, 6.1, PG III, RQ				
	TRANSPORTATION				
	STATE SALES TAX city and county specific				
	HAZARDOUS WASTE TAX 2%				<u>7.08</u>

When transporting hazardous materials include the technical or chemical name for U.S.S. (if otherwise specified) or generic description of material with appropriate UN or NA number as defined in US DOT Emergency Communication Standard (HM-128C) Provide

MAILING ADDRESS	Veolia ES Technical Solutions L.L.C. Attn: Dry Cleaners & Automotive Refinishing 107 South Motor Avenue, Azusa, CA 91702-3226	CHECK # <u>4322</u>	COD AMOUNT <u>361.08</u>
		CREDIT CARD	

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 _____
This is to certify that the above named materials are property classified, described, packaged, marked, and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation: _____ (Signature)
Subject to Section 7 of the 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)

Received, subject to the classifications and lawfully filed tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned and destined as indicated above which said carrier (the word carrier 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 route, 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 said property, that every service to be performed hereunder shall be subject to all the Bill of Lading terms and conditions in the governing classification on the date of shipment. Shipper hereby certifies that he is familiar with all the Bill of Lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns. NOTICE: Freight moving under this Bill of Lading is subject to the classifications and lawfully filed tariffs in effect on the date of the Bill of Lading. This notice supersedes and negates any claimed, alleged or asserted oral or written contract, promise, representation or understanding between the parties with respect to this freight, except to the extent of any written contract which establishes lawful contract carriage and is signed by authorized representatives of both parties to the contract.

Generator: <u>COLDWATER CLEANERS</u>	Transporter: Veolia ES Technical Solutions L.L.C.
Print name: <u>[Signature]</u>	Print name: <u>MICHAEL [Signature]</u>
Sign name: <u>[Signature]</u>	Sign name: <u>[Signature]</u>
Date: <u>1-18-18</u>	Date: <u>1-18-18</u>

MIKE

WASTE MATERIAL RECEIPT

Consolidated Manifest # 001250368VES Receipt # 011818-2 Date 1-18-18

TO		FROM	
Facility: Veolia ES Technical Solutions L.L.C.	Generator: <u>COLDWATER CLEANERS</u>	Street: <u>4262 COLDWATER CYN AVE</u>	
Street: 1704 W. First Street	Origin: <u>STUDIO CITY, CA 91604</u>	Customer phone # <u>818 761 0129</u>	
Destination: Azusa, CA 91702	Generator EPA # <u>CAR 000 008 771</u>	Transporter EPA # <u>NJD080631369</u>	
Driver-Truck #	24 Hour Emergency Response Phone # (877) 818-0087		

1 FILTER IN 15MINU SPURT

Shipping Units	HM	D.O.T. PROPER SHIPPING NAME	30 gal drum size gallon/pounds Subject to correction	55 gal drum size gallon/pounds Subject to correction	rate	total
1	X	UN1897, WASTE TETRACHLOROETHYLENE, 6.1, PG III, (F002, D039), RQ	<u>708623</u> 30G		<u>9.00</u>	<u>270.00</u>
1	X	UN 2811, TOXIC SOLIDS, ORGANIC, N.O.S., (Filters, Debris), 6.1 (F002, D039), PG III	<u>709398</u> 130P		<u>2.33</u>	<u>84.00</u>
	X	NA1993, COMBUSTIBLE LIQUID, N.O.S., (Aliphatic Hydrocarbons) (Cyclosiloxane) PG III NON-RCRA HAZARDOUS WASTE SOLID (Filters, Debris, Diatomaceous Earth contaminated with				

PRODUCT DELIVERY

Consignee / Bill To:	Shipper: Veolia ES Technical Solutions L.L.C.
Street: 1704 W. First Street	Street: 1704 W. First Street
City: Azusa, CA 91702	Origin: Azusa, CA 91702
Reference #	gal/lbs rate total

X	UN1897, TETRACHLOROETHYLENE, 6.1, PG III, RQ				
	TRANSPORTATION				
	STATE SALES TAX city and county specific				
1	HAZARDOUS WASTE TAX 2%				<u>7.08</u>

MAILING ADDRESS	Veolia ES Technical Solutions L.L.C. Attn: Dry Cleaners & Automotive Refinishing 107 South Motor Avenue, Azusa, CA 91702-3226	CHECK # <u>4322</u> CREDIT CARD	COD AMOUNT <u>361.08</u>
-----------------	---	------------------------------------	-----------------------------

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 _____
This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation: _____ (Signature)
Subject to Section 7 of the 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)

Received, subject to the classifications and lawfully filed tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned and destined as indicated above which said carrier (the word carrier 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 route, 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 said property, that every service to be performed hereunder shall be subject to all the Bill of Lading terms and conditions in the governing classification on the date of shipment. Shipper hereby certifies that he is familiar with all the Bill of Lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns. NOTICE: Freight moving under this Bill of Lading is subject to the classifications and lawfully filed tariffs in effect on the date of the Bill of Lading. This notice supersedes and negates any claimed, alleged or asserted oral or written contract, promise, representation or understanding between the parties with respect to this freight, except to the extent of any written contract which establishes lawful contract carriage and is signed by authorized representatives of both parties to the contract.

Generator: <u>COLDWATER CLEANERS</u>	Transporter: Veolia ES Technical Solutions L.L.C.
Print name: <u>[Signature]</u>	Print name: <u>MICHAEL [Signature]</u>
Sign name: <u>[Signature]</u>	Sign name: <u>[Signature]</u>
Date: <u>1-18-18</u>	Date: <u>1-18-18</u>

Date 07-17-08
Driver Ruben R
Consolidated Manifest # 000025690VES

Customer Phone 918-761-0129
Receipt # 071708-3

TO:		MATERIAL RECEIPT		FROM:	
Facility:	Veolia ES Technical Solutions L.L.C.	Generator:	Coldwater Cleaners		
Street:	1704 W. First Street	Street:	4362 Coldwater Canyon		
Destination:	Azusa, CA 91702	Origin:	Studio City, CA 91604		
Facility EPA #	CAD008302903	Generator EPA #	CA000008771		
Transporter:	Veolia ES Technical Solutions L.L.C.	Transporter EPA #	NJD080631369		
24 Hour Emergency Response Phone # (800-535-5053)					

# Shipping Units	HM	DOT Proper Shipping Name	gal/lbs (subject to correction)	Rate	Charges
1	X	RQ WASTE TETRACHLOROETHYLENE LIQUID 6.1 UN1897 PG III (F002, D039) <u>708623</u>	18 G	3 ⁰⁰	54.00
		RQ WASTE TETRACHLOROETHYLENE SOLID 6.1 UN1897 PG III (F002, D039) (Filters, Debris)			

TO:		Product Delivery		FROM:	
Consignee:	Coldwater Cleaners	Shipper:	Veolia ES Technical Solutions L.L.C.		
Street:	4362 Coldwater Canyon	Street:	1704 W. First Street		
Destination:	Studio City, CA 91604	Origin:	Azusa, CA 91702		

# Shipping Units	HM	DOT Proper Shipping Name	gal/lbs	Rate	Charges
1	X	TETRACHLOROETHYLENE, 6.1, UN1897, PGIII			
		TETRACHLOROETHYLENE, 6.1, UN1897, PGIII, RECYCLED	30 G	39.00	\$ 270.00
		SECONDARY CONTAINMENT PALLET	SST 8.25%		\$ 22.28
		<u>MSDS</u>			\$ 292.28

When transporting hazardous materials include the technical or chemical name for n.o.s. (not otherwise specified) or generic description of material with appropriate UN or NA number as defined in US DOT Emergency Communication Standard (HM-1256) Provide PC 250

Remit C.O.D. to:		COD AMT: \$ <u>346.28</u>	C.O.D. Fee \$
Address:			Prepaid <input type="checkbox"/> Collect <input type="checkbox"/>

Note - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.	Total
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding \$ _____ per _____	Charges \$
This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation: _____ (Signature)	Freight Charges
Subject to Section 7 of the 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)	Freight prepaid except when marked below. Check Box if charges are to be collect: <input type="checkbox"/>

Received, subject to the classifications and lawfully filed tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned and destined as indicated above which said carrier (the word carrier 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 route, 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 said property, that every service to be performed hereunder shall be subject to all the Bill of Lading terms and conditions in the governing classification on the date of shipment. Shipper hereby certified that he is familiar with all the Bill of Lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns. NOTICE: Freight moving under this Bill of Lading is subject to the classifications and lawfully filed tariffs in effect on the date of the Bill of Lading. This notice supersedes and negates any claimed, alleged or asserted oral or written contract, promise, representation or understanding between the parties with respect to this freight, except to the extent of any written contract which establishes lawful contract carriage and is signed by authorized representatives of both parties to the contract.

Generator:	Coldwater Cleaners	Transporter:	Veolia ES Technical Solutions L.L.C.
Print name:	MARY ZENSIRY	Print name:	GARY SWATT
Sign name:	<u>[Signature]</u>	Sign name:	<u>[Signature]</u>
Date:	07-17-08	Date:	07-17-08

* Hazardous Materials, Mark with "X" to designate hazardous materials as referenced in 40CFR § 172.202.

Agent must detach and retain a copy of this Shipping Order and must sign the Original Bill of Lading



Mike

Order Desk
(800) 395-6726 ext. 511

WASTE MATERIAL RECEIPT

Consolidated Manifest # 001250368VES Receipt # 011878-2 Date 1-18-18

TO		FROM	
Facility:	Veolia ES Technical Solutions L.L.C.	Generator:	<u>COLDWATER CLEANERS</u>
Street:	1704 W. First Street	Street:	<u>4262 COLDWATER CYN AVE</u>
Destination:	Azusa, CA 91702	Origin:	<u>STUDIO CITY, CA 91604</u>
Driver-Truck #		Customer phone #	<u>818 761 0129</u>
Facility EPA #	CAD008302903	Generator EPA #	<u>CAR 000 008 771</u>
Transporter:	Veolia ES Technical Solutions L.L.C.	Transporter EPA #	NJD080631369

24 Hour Emergency Response Phone # (877) 818-0087

Shipping Units	HM	D.O.T. PROPER SHIPPING NAME	30 gal drum size gallon/pounds Subject to correction	55 gal drum size gallon/pounds Subject to correction	rate	total
/	X	UN1897, WASTE TETRACHLOROETHYLENE, 6.1, PG III, (F002, D039), RC	<u>708623 30G</u>	/	<u>9.00</u>	<u>270.00</u>
/	X	UN 2811, TOXIC SOLIDS, ORGANIC, N.O.S., (Filters, Debris), 6.1 (F002, D039), PG III	<u>709398 130P</u>	/	<u>2x33 1x30</u>	<u>84.00</u>
	X	NA1993, COMBUSTIBLE LIQUID, N.O.S., (Aliphatic Hydrocarbons) (Cyclosiloxane) PG III NON-RCRA HAZARDOUS WASTE SOLID (Filters, Debris, Diatomaceous Earth contaminated with)				

1 FILTER IN 55 GAL DRUM

PRODUCT DELIVERY

Consignee / Bill To:	Shipper:	Veolia ES Technical Solutions L.L.C.
Street:	Street:	1704 W. First Street
City:	Origin:	Azusa, CA 91702
Reference #		

		gal/lbs	rate	total
X	UN1897, TETRACHLOROETHYLENE, 6.1, PG III, RC			
	TRANSPORTATION			
	STATE SALES TAX city and county specific			
	HAZARDOUS WASTE TAX 2%			<u>7.08</u>

When transporting hazardous materials include the technical or chemical name for n.o.s. (if otherwise specified) or generic description of material with appropriate UN # NA number as defined in US DOT Emergency Response Guidebook (HM-125) Provide

MAILING ADDRESS	Veolia ES Technical Solutions L.L.C. Attn: Dry Cleaners & Automotive Refinishing 107 South Motor Avenue, Azusa, CA 91702-3226	CHECK # <u>4322</u>	COD AMOUNT <u>361.08</u>
		CREDIT CARD	

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

This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation: (Signature)

Subject to Section 7 of the 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)

Received, subject to the classifications and lawfully filed tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned and destined as indicated above which said carrier, the motor carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the consigned agreement to carry to its usual place of delivery at said destination from its route, 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 in any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the Bill of Lading terms and conditions in the governing classification on the date of shipment. Shipper hereby certifies that he is familiar with all the Bill of Lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns. NOTICE: Freight moving under this Bill of Lading is subject to the classifications and lawfully filed tariffs in effect on the date of the Bill of Lading. This notice supersedes and negates any claimed, alleged or asserted oral or written contract, promise, representation or understanding between the parties with respect to this freight, except to the extent of any written contract which establishes a lawful contract carriage and is signed by authorized representatives of both parties to the contract.

Generator:	<u>COLDWATER CLEANERS</u>	Transporter:	Veolia ES Technical Solutions L.L.C.
Print name:	<u>[Signature]</u>	Print name:	<u>MICHAEL DOBIE</u>
Sign name:	<u>[Signature]</u>	Sign name:	<u>[Signature]</u>
Date:	<u>1-18-18</u>	Date:	<u>1-18-18</u>

* Hazardous Materials, Mark with "X" to designate hazardous materials as referenced in 40CFR § 172.202.

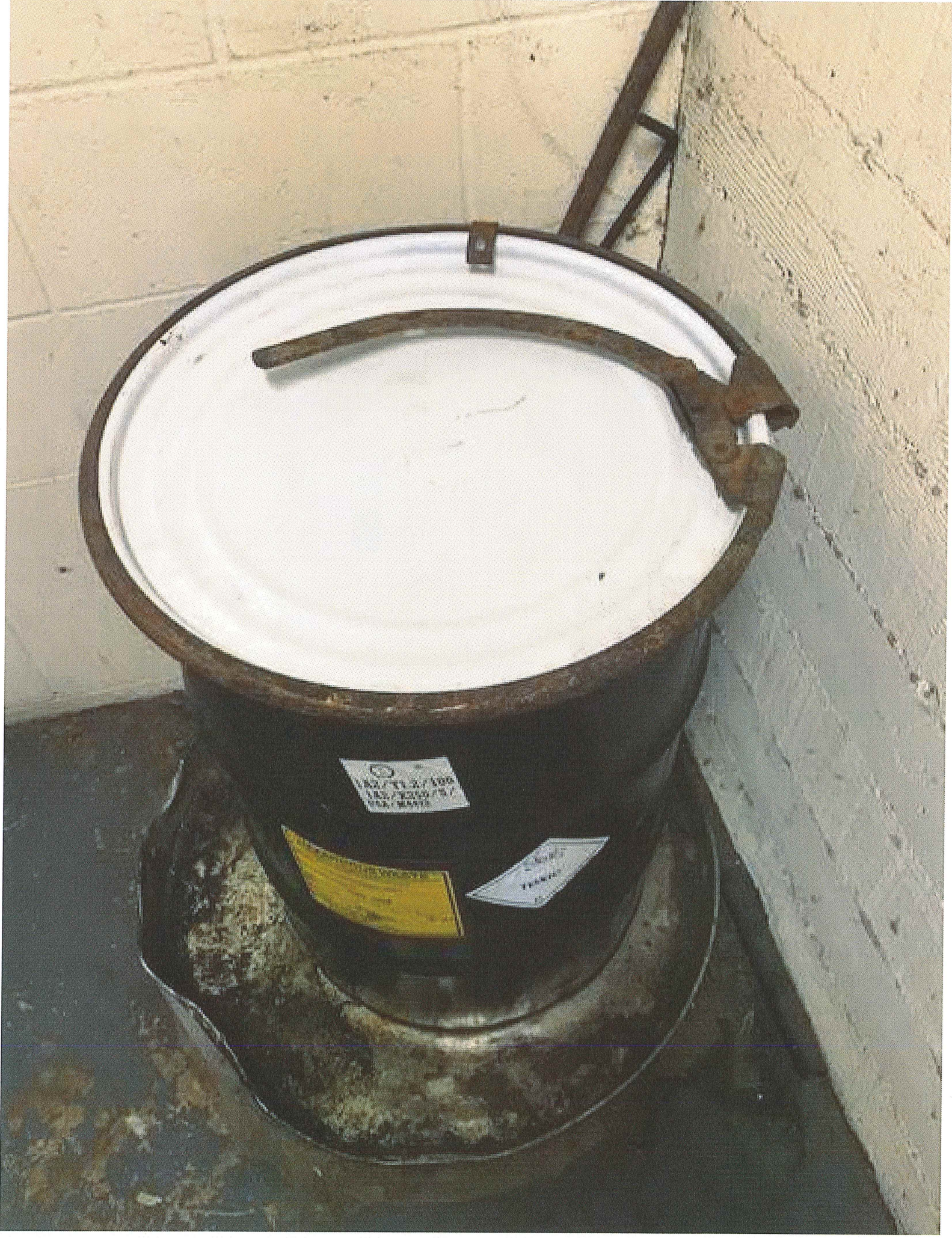
Agent must detach and retain a copy of this Shipping Order and must sign the Original Bill of Lading.

Revised 3-4-17

3-3

EXHIBIT F





5
100/100
100/100
100/100

FRAGILE

FRAGILE



HAZARDOUS WASTE
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