SUMMARY OF VIOLATIONS

On June 9 & July 6, 2016, the Department of Toxic Substances Control (DTSC), California Environmental Protection Agency, conducted an inspection at:

Facility Name: Quemetco, Inc.
Facility Address: 720 South 7th Avenue
City of Industry, California 91746
EPA ID Number: CAD066233966 County: Los Angeles

As a result of this inspection, a violation of hazardous waste laws, regulations, and requirements listed on the attached pages was discovered. The violation must be corrected; the actions you must take to correct the violations are listed with each violation. If you disagree with any of the violations or proposed corrective actions listed in this Summary of Violations, you should inform DTSC. Additional violations may be found after the site visit, and these will be identified in an Addendum Summary of Violations and/or the Violation section of the inspection report.

DTSC will provide you a complete inspection report within 65 days of the date of this inspection. You may request a meeting with DTSC to discuss the inspection, inspection report, or the Summary of Violations. The issuance of this Summary of Violations does not preclude DTSC from taking administrative, civil, or criminal action as a result of the violations noted in the Summary of Violations or violations that have not been corrected within the time provided. A false statement that compliance has been achieved is a violation of the law and punishable by a fine of not less than $2,000 or more than $25,000 for each occurrence. DTSC may re-inspect this facility at any time.

Company Representative Accepting Summary
Name: Scott Bevans
Signature: Scott Bevans
Title: Plant Manager
Date: July 12, 2016

DTSC Representative
Name: Tolu Awosika
Signature: [Signature]
Title: Senior Environmental Scientist
Date: 7/12/2016
ADDENDUM TO SUMMARY OF VIOLATIONS

Facility Name: Quemetco, Inc.                       Date: June 9/July 6, 2016

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

You must correct the following violation(s) within the specified time frame for each violation.

1. Quemetco, Inc. violated California Code of Regulations, title 22, section 66264.1101(b)(3), in that Quemetco failed to comply with the regulatory requirement that a containment building used to manage hazardous wastes containing free liquids or treated with free liquids include a secondary containment system with a functioning a leak detection system that is capable of detecting failure of the primary barrier of that building.

Evidence:
Observations made by the Department's inspectors.
Video documentation.
Documentation and statements provided by Quemetco's representatives.

Corrective Action:
Effective immediately, and pursuant to the regulatory requirements, Quemetco shall remove the portion of the containment building from service that is affected by not having a functioning leak detection system. Within fourteen (14) working days of the date of this Addendum to the SOV, Quemetco must provide a plan for DTSC review and approval which demonstrates how liquids will be removed from the floor of the containment building, alternative storage, if any, for the waste, and a plan to repair the leak detection system. Additionally, upon completing the repair and cleanup Quemetco shall notify the Department in writing and provide a verification signed by a qualified, registered professional engineer, that the repair and cleanup have been completed.