California Environmental Protection Agency
Department of Toxic Substances Control

HAZARDOUS WASTE POST CLOSURE FACILITY PERMIT

Facility Name:
USS-POSCO Industries
900 Loveridge Road
Pittsburg, California 94565

Owner Name:
USS-POSCO Industries
P.O. Box 471
Pittsburg, California 94565

Operator Name:
USS-POSCO Industries
P.O. Box 471
Pittsburg, California 94565

Facility EPA ID Number:
CAD009150194

Effective Date:
April 21, 2014

Expiration Date:
April 21, 2024

Pursuant to California Health and Safety Code section 25200, this Resource Conservation and Recovery Act (RCRA)-equivalent Hazardous Waste Facility Permit is hereby issued to: USS-POSCO Industries

The Issuance of this Permit is subject to the terms and conditions set forth in the Approved Application dated April 2012, revised March and August 2013. The Permit consists of 16 pages including figures.

Edward Nieto, P.E.
Supervising Hazardous Substances Engineer
Office of Permitting
Date: March 21, 2014

HAZARDOUS WASTE POST CLOSURE FACILITY PERMIT

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PART I. DEFINITIONS

All terms used in this Permit shall have the same meaning as those terms have in the California Health and Safety Code, division 20, chapter 6.5 and California Code of Regulations, title 22, division 4.5, unless expressly provided otherwise by this Permit.

1. **"DTSC"** as used in this Permit means the California Department of Toxic Substances Control.

2. **"Facility"** as used in this Permit means all contiguous land and structures, other appurtenances, and improvements on the land used for the treatment, transfer, storage resource recovery, disposal or recycling of hazardous waste. A hazardous waste facility may consist of one or more treatment, transfer, storage, resource recovery, disposal or recycling operational units or combinations of these units.

   For the purpose of implementing corrective action under California Code of Regulations, title 22, division 4.5, a hazardous waste facility includes all contiguous property under the control of the owner or operator required to implement corrective action.

3. **"Permittee"** as used in this Permit means the Owner and Operator.

4. **"RCRA"** as used in this Permit means the Resource Conservation and Recovery Act (42 U.S.C. §6901 et seq.).

PART II. DESCRIPTION OF THE FACILITY AND OWNERSHIP

1. Owner of Facility

USS-POSCO Industries (UPI)
900 Loveridge Road
Pittsburg, California 94565

2. Owner of Real Property

USS-POSCO Industries
P.O. Box 471
Pittsburg, California 94565

3. Operator of Facility

USS-POSCO Industries
P.O. Box 471
Pittsburg, California 94565

4. Location

USS-POSCO Industries
900 Loveridge Road
Pittsburg, California 94565

The site location is shown on Figure 1. Figure 1 also shows UPI parcels, easements, and legal boundaries. Figure 2 is an aerial view of UPI which highlights the location of the Unit I CAMU.

5. Description of Facility Operations

The subject of this permit pertains exclusively to the approximate 10 acre facility closure, referred to as “Unit I CAMU”, or the “Facility” (Figure 1). The Facility is a closed landfill, which is covered, capped, monitored and enclosed by a security fence. The Facility provides drainage for rainwater runoff from the closd landfill to a water retention basin.

6. Facility History

UPI has been manufacturing and finishing steel at the Pittsburg, California plant since 1909. Currently the manufacturing plant processes semi-finished hot band coils obtained from off-site steel producers. UPI converts these hot band coils into finished steel products through methods known as cold reduction, annealing, and finishing. These methods employ techniques such as electrolytic tinning and

chroming, pickling with hydrochloric and sulfuric acids, hot-dip galvanizing, cold rolling, alkaline cleaning, and annealing. Finished steel products include cold-rolled steel, galvanized steel, and tin and chrome-plated steel strip.
UPI was formed as a joint venture between United States Steel Corporation (USS) and Pohang Iron and Steel Co., Ltd. (POSCO) in 1986. USS owned the UPI plant before 1986. The Facility is located in an area adjacent to the UPI plant designated as Site L-B (Figure 2).

Between 1971 and 1989, Site L-B included five unlined sludge-thickening impoundments and a dried sludge disposal area. These impoundments accepted Class I waste sludge for de-watering and drying. The dried sludge was then placed on the unlined ground surface for disposal. The five impoundments were closed in 1989 while the dried sludge disposal area continued to accept dried sludge. The sludge disposal area later became known as Unit I. The unit was closed in September 1995 and post-closure monitoring began in January 1996. The Facility was re-opened in 2003 as a Corrective Action Management Unit (CAMU) and used for the disposal of remediation materials from other portions of the site. The Facility was re-closed in 2004.

7. Facility Size and Type for Fee Purposes

The Facility is categorized as a large post-closure facility pursuant to Health and Safety Code section 25205.7(d)(5). For the purpose of Health and Safety Code section 25205.4, the post-closure period for the facility shall be deemed to have started on March 3, 2005 which is the date that closure certification was accepted by DTSC.

PART III. GENERAL CONDITIONS

1. Permit Application Documents

The DTSC-approved Application which consist of *Site L-B Unit I CAMU Post-Closure Permit Renewal (Part A), dated April 2012, revised March 2013, and Site L-B Unit I CAMU Post-Closure Permit Renewal (Part B) dated April 2012, revised March and August 2013,* is hereby made a part of this Permit by reference.

2. Effect of Permit

(a) The Permittee shall comply with the terms and conditions of this Permit and the provisions of the Health and Safety Code and California Code of Regulations (Cal. Code Regs.), title 22, division 4.5. The issuance of this Permit by DTSC does not release the Permittee from any liability or duty imposed by federal or state statutes or regulations or local ordinances, except the obligation to obtain this Permit. The Permittee shall obtain the permits required by other governmental agencies, including but not limited to, those required by the applicable land use planning, zoning, hazardous waste, air quality, water quality, and solid waste management laws for the construction and/or operation of the Facility.

(b) The Permittee is permitted to operate, monitor and maintain this Facility for post closure activities in accordance with the terms and conditions of this Permit and the Approved Application. Any management of hazardous wastes not specifically authorized in this Permit is strictly prohibited.

(c) Compliance with the terms and conditions of this Permit does not constitute a defense to any action brought under any other law governing protection of public health or the environment, including, but not limited to, one brought for any imminent and substantial endangerment to human health or the environment.

(d) DTSC's issuance of this Permit does not prevent DTSC from adopting or amending regulations that impose additional or more stringent requirements than those in existence at the time this Permit is issued and does not prevent the enforcement of these requirements against the Permittee.

(e) Failure to comply with any term or condition set forth in the Permit in the time or manner specified herein will subject the Permittee to possible enforcement action including but not limited to penalties pursuant to Health and Safety Code section 25187.

(f) Failure to submit any information required in connection with the Permit, or falsification and/or misrepresentation of any submitted information, is grounds for revocation of this Permit (Cal. Code Regs., tit. 22, §66270.43).

(g) In case of conflicts between the Approved Application and the Permit, the Permit conditions take precedence.

(h) This Permit includes and incorporates by reference any conditions of waste discharge requirements issued to the Facility by the State Water Resources Control Board or any of the California Regional Water Quality Control Boards and any conditions imposed pursuant to section 13227 of the Water Code.

3. Compliance with California Environmental Quality Act (CEQA)

A Notice of Exemption has been prepared in accordance with the requirements of Public Resources Code section 21000 et seq. and the CEQA Guidelines, section 15061 (b)(3) et seq. of California Code of Regulations, title 14.

4. Environmental Monitoring

The Permittee shall comply with the applicable environmental monitoring and response program requirements of California Code of Regulations, title 22, division 4.5, chapter 14, articles 6 and 17.

(a) For the purpose of California Code of Regulations, title 22, section 66264.91(b), the elements of the Groundwater Monitoring and Response Program (GWMRP) for the Facility are those described in Section 6.4 and Appendix H of the Approved Application.

(b) For the purpose of California Code of Regulations, title 22, section 66264.92, the Water Quality Protection Standard for the Facility is described in Section 6.4 and Appendix H of the Approved Application.

(c) For the purpose of California Code of Regulations, title 22, section 66264.93, the Constituents of Concern (COC) for groundwater at the Facility are described in Section 6.4.3 of the Approved Application.

(d) For the purpose of California Code of Regulations, title 22, section 66264.94, the Concentration Limits for the Facility are described in Section 6.4.7 of the Approved Application.

(e) For the purpose of California Code of Regulations, title 22, section 66264.95, the Monitoring Points and the POC for groundwater for the Post Closure Unit at the Facility are described in Section 6.4.1 and Appendix H of the Approved Application.

(f) For the purpose of California Code of Regulations, title 22, section 66264.96 the Compliance Period for the Post Closure Unit at the Facility shall be 30 years beginning with the effective date of the Permit. DTSC may extend the post-closure monitoring period beyond the 30 years to protect human health and the environment.

(g) For the purpose of California Code of Regulations, title 22, section 66270.31, the monitoring, recording, and reporting program for groundwater at the Facility is described in Section 6.5, Section 6.6 and Appendix H of the Approved Application

(h) For the purpose of California Code of Regulations, title 22, section 66264.310(a)(7), the closure and post closure care for a seismic event at the Facility is described in Section 5.2 and Appendix F of the Approved Application.

5. Annual Hazardous Waste Reduction and Minimization Certification

The Permittee shall certify annually that it has a hazardous waste reduction and minimization program and method in place and shall keep the annual certification as part of its Operating Record in accordance with Health and Safety Code section 25202.9 and California Code of Regulations, title 22, section 66264.73(b)(9)**.**

6. Access

(a) DTSC, its contractors, employees, agents, and/or any United States Environmental Protection Agency representatives are authorized to enter and freely move about the Facility for the purposes of interviewing Facility personnel and contractors; inspecting records, operating logs, and contracts relating to the Facility; reviewing progress of the Permittee in carrying out the terms of Part VI of the Permit; conducting such testing, sampling, or monitoring as DTSC deems necessary; using a camera, sound recording, or other documentary-type equipment; verifying the reports and data submitted to DTSC by the Permittee; or confirming any other aspect of compliance with this Permit, Health and Safety Code, division 20, chapter 6.5, and California Code of Regulations, title 22, division 4.5. The Permittee shall provide DTSC and its representatives access at all reasonable times to the Facility and any other property to which access is required for implementation of any provision of this Permit, Health and Safety Code, division 20, chapter 6.5, and California Code of Regulations, title 22, division 4.5, and shall allow such persons to inspect and copy all records, files, photographs, documents, including all sampling and monitoring data, that pertain to work undertaken pursuant to the entire Permit or undertake any other activity necessary to determine compliance with applicable requirements.

(b) Nothing in this Permit shall limit or otherwise affect DTSC's right to access and entry pursuant to any applicable State or federal laws and regulations.

PART IV. PERMITTED UNITS AND ACTIVITIES

This Permit authorizes the operation, monitoring and maintenance only of the Facility unit and activities listed below. The Permittee shall not treat, store or otherwise manage hazardous waste in any unit other than those specified in Part IV of this permit. Any modifications to a unit or activity authorized by this Permit require the written approval of DTSC in accordance with the permit modification procedures set forth in California Code of Regulations, title 22, division 4.5.

For the purpose of California Code of Regulations, title 22, section 66270.1(c) and other similar, unit-specific regulatory requirements, this Facility has one Hazardous Waste Management Unit. This unit is described in detail in the Approved Application and as follows:

UNIT NAME:

Unit I CAMU.

LOCATION:

The Facility is located in an area adjacent to UPI plant, as shown in Figure 2, designated as Site L-B that is approximately 50 acres.

ACTIVITY TYPE:

Post-closure maintenance, environmental monitoring, and routine inspections.

ACTIVITY DESCRIPTION:

Post-closure maintenance activities include inspections of the conditions of the cover and monitoring of surface water and groundwater. The inspections of the cover include monthly inspections of the condition of access controls, condition of protective vegetation, evidence of erosion, cracking, or seepage, evidence of slope instability, subsidence, settlement or rodent damage. The surface water inspections involve reviewing the condition of drainage control, condition of run-off and run-on control systems. General maintenance and inspections will consist of reviewing the condition of safety shower and eye bubbler, condition of surveyed benchmarks, and surface conditions of groundwater monitoring wells. Annual inspections consist of sampling and analysis of surface water, site survey of settlement markers to verify the horizontal location and elevation of the final cover and drainage conditions on the top deck of the Unit I CAMU, and a site inspection. During the site inspections, monitoring wells will be inspected annually. The final cover will be maintained at minimum slope gradients to promote proper surface water run-off. During inspections, evidence of any drainage interference will be noted. Other post-closure maintenance activities will be vegetation and rodent control, ensuring survey monuments are intact and clear of debris, and that

fencing and warning signs are repaired to maintain the integrity of the site. The Self-Monitoring Groundwater Program includes monitoring groundwater elevations at least twice per year and groundwater sampling frequency will be annual.

PHYSICAL DESCRIPTION:

Unit I is a post-closure hazardous waste landfill, comprised of an unlined ground surface and an engineered final closure cover.

MAXIMUM CAPACITY:

264,020 cubic yards.

WASTE TYPES:

Former waste types that are currently in the Unit I CAMU include the following:

- Wastewater treatment plant sludge and associated soils,
- Dredging,
- Construction debris,
- Impoundment closure sludge and soil,
- Biofarm soil,
- Material and soil with metals,
- Oily material and soil.

RCRA HAZARDOUS WASTE CODES:

This Unit is closed and does not accept hazardous waste.
Process code related to Unit I CAMU: D80

AIR EMISSION STANDARDS

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5.

PART V. SPECIAL CONDITIONS

1. The Permittee shall comply with the requirements of the RWQCB SCR No. R2-2011-0048 or any subsequent revisions made by RWQCB. The Permittee shall simultaneously provide to DTSC a copy of all the submittals required by the RWQCB.

2. Within 180 days of the effective date of this Permit, the Permittee shall have a DTSC-approved Land Use Covenant signed and recorded pursuant to California Code of Regulations, title 22, section 67391.1. The Permittee shall reimburse DTSC for its costs incurred in implementing and enforcing the Land Use Covenant, including costs incurred in conducting inspections, preparing inspection reports, and reviewing any Soil Management Plan or Health and Safety Plan as may be required by the Land Use Covenant. The Permittee's payments of DTSC's costs shall be made within 60 days of the date of the billing statement by check payable to the Department of Toxic Substances Control and shall be sent to: Accounting Unit, Department of Toxic Substances Control, P. O. Box 806, Sacramento, California 95812-0806. All checks shall reference the name and address of the Facility.

3. Since the current monitoring well network is subject to change over time to allow for soil and groundwater treatment, removal, and assessment,the interim post-closure monitoring network will include a network of wells that are sufficient to monitor the soil and groundwater impact at the Facility; and the network will include existing wells, replacement wells for those abandoned to perform treatment, and selected technology-specific monitoring wells. In any of these events, the Permittee may implement repairs, replacement and abandonment of the post-closure wells and piezometers, and construction of new post-closure wells and piezometers without a permit modification as long as the Permittee makes these changes in accordance with a workplan approved by the RWQCB and notifies DTSC of the proposed changes for the interim network. The Permittee shall obtain written approval from DTSC and RWQCB for the final post-closure monitoring well network once soil and groundwater treatment, removal, and assessment have been completed.

PART VI. CORRECTIVE ACTION

Corrective action is not currently required at the Facility.

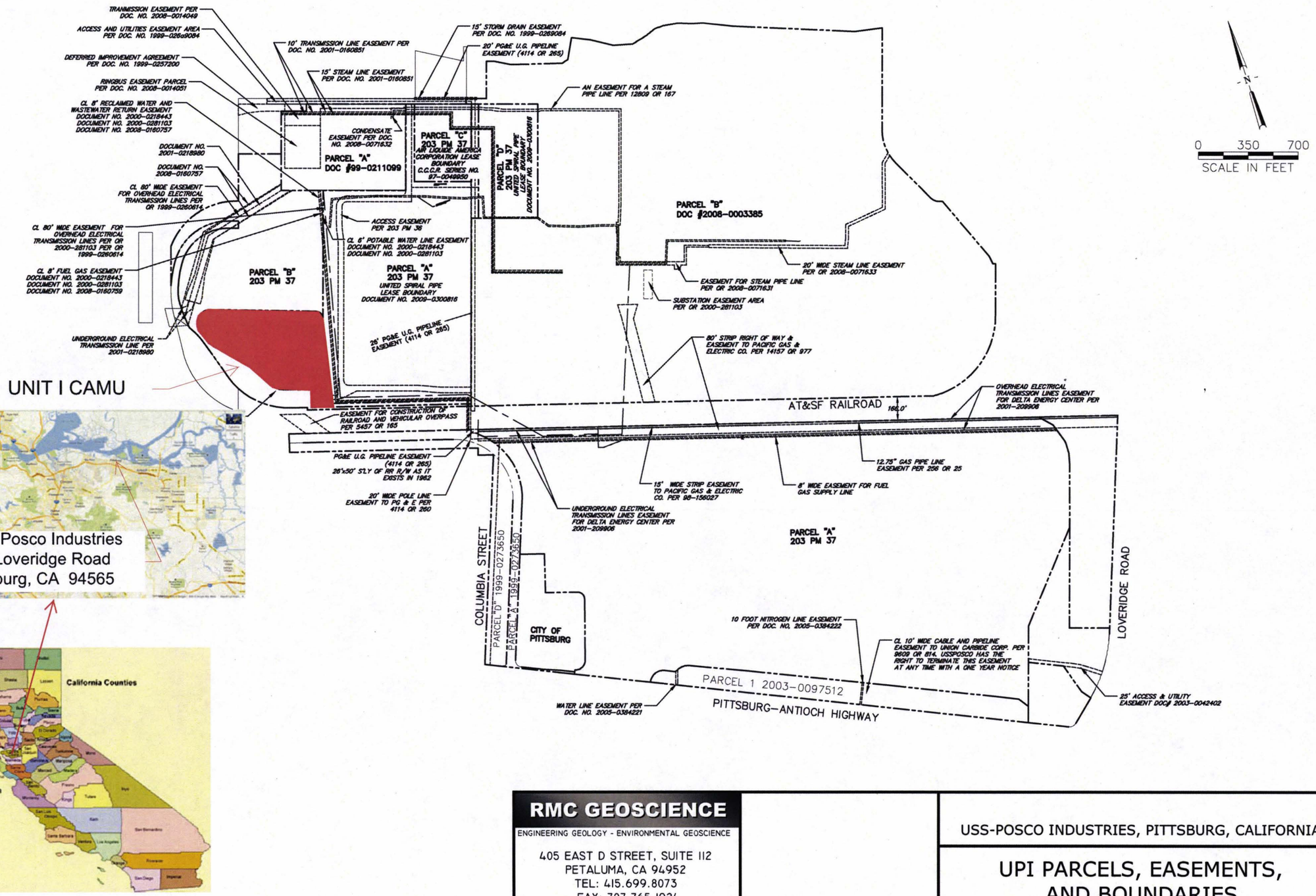
1. In the event the Permittee identifies an immediate or potential threat to human health and/or the environment, discovers new releases of hazardous waste and/or hazardous constituents, or discovers new Solid Waste Management Units (SWMUs) not previously identified, the Permittee shall notify DTSC orally within 24 hours of discovery and notify DTSC in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.

2. DTSC may require the Permittee to investigate, mitigate and/or take other applicable action to address any immediate or potential threats to human health and/or the environment and newly identified SWMUs or releases of hazardous waste and/or hazardous constituents. If and when corrective action is required at the Facility, the Permittee shall conduct corrective action under either a Corrective Action Consent Agreement or an Enforcement Order for Corrective Action issued by DTSC pursuant to Health and Safety Code sections 25187 and 25200.10.

3. To the extent that work being performed pursuant to Part VI of the Permit must be done on property not owned or controlled by the Permittee, the Permittee shall use its best efforts to obtain access agreements necessary to complete work required by this Part of the Permit from the present owner(s) of such property within 30 days of approval of any workplan for which access is required. “Best efforts” as used in this paragraph shall include, at a minimum, a certified letter from the Permittee to the present owner(s) of such property requesting access agreement(s) to allow the Permittee and DTSC and its authorized representatives access to such property and the payment of reasonable sums of money in consideration of granting access. The Permittee shall provide DTSC with a copy of any access agreement(s). In the event that agreements for the access are not obtained within 30 days of approval of any workplan for which access is required, or of the date that the need for access becomes known to the Permittee, the Permittee shall notify DTSC in writing within 14 days thereafter regarding both efforts undertaken to obtain access and its failure to obtain such agreements. In the event DTSC obtains access, the Permittee shall undertake approved work on such property. If there is any conflict between this permit condition on access and the access requirements in any agreement entered into between DTSC and the Permittee, this permit condition on access shall govern.

4. Nothing in Part VI of the Permit shall be construed to limit or otherwise affect the Permittee’s liability and obligation to perform corrective action including corrective action beyond the facility boundary, notwithstanding the lack of access. DTSC may determine that additional on-site measures must be taken to address releases beyond the Facility boundary if access to off-site areas cannot be obtained.

FIGURES



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USS-POSCO INDUSTRIES, PITTSBURG, CALIFORNIA

UPI PARCELS, EASEMENTS, AND BOUNDARIES

DATE: MARCH 2012
FIGURE: 1

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Figure 1. Proximity Map, Facility Parcels, Easements, and Boundaries

UNIT I CAMU

PLANT LOCATION:

LATITUDE:	38° 01min. 48sec.
LONGITUDE:	121° 51min. 32sec.
TOWNSHIP:	2-N
RANGE:	1-E
SECTION:	RANCHOS LOS MEDANOS
PRINCIPAL MERIDIAN:	W-122 MOUNT DIABLO BASE MERIDIAN

HORIZONTAL DATUM:

CALIFORNIA STATE PLANE COORDINATE SYSTEM ZONE III (NAD27).

SOURCE/REFERENCE:

LEGAL BOUNDARY: USS-POSCO INDUSTRIES DRAWING No. 90418.

TOPOGRAPHIC SURVEY: BY RONALD GREENWELL & ASSOCIATES, DATED AUGUST, 1991.

REVISED 9-30-92 TO REFLECT AS-BUILT SURVEYS, BY JEFFRIES ENGINEERS DATED 10-22-91 AND 10-28-91.

REVISED 5-01 TO REFLECT AS-BUILT SURVEYS FOR UNIT I, UNIT II AND STORMWATER RETENTION BASIN, BY G.A. FITCH & ASSOC., INC. DATED 10/95.

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USS/POSCO

USS-POSCO INDUSTRIES, PITTSBURG, CALIFORNIA

AERIAL VIEW OF UPI PLANT

DATE: MARCH 2012

FIGURE: 2

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Figure 2. Aerial View of Facility