

APPENDIX II  
DOCUMENTATION OF CAPACITY OF NEW AND PROPOSED  
FACILITIES IN ALAMEDA COUNTY



Evergreen Oil Inc



May 2, 1988

Ms. Betty Croly  
Assistant Planning Director  
Alameda County Planning Department  
399 Elmhurst Street  
Hayward, CA 94544

SUBJECT: Alameda County Hazardous Waste Management Plan,  
Comments and Remarks

Dear Ms. Croly:

It was a pleasure to finally meet you last Thursday at the public hearing. I welcomed the opportunity to describe the Evergreen Oil waste oil recycling facility's operations and the fact that it is located in Alameda County (in Newark).

Upon reviewing the Draft Plan prepared by Exceltech, Inc., Evergreen would like to make the following comments and remarks:

1. Evergreen is a fully permitted, Part B hazardous waste recycling facility which uses state-of-the-art technology to recycle waste oils into petroleum products.
2. The Draft Plan estimates a baseline waste oil generation of 58,200 tons (16.6 million gallons) in the year 2000, which is about 42% of all projected hazardous waste streams.
3. With strict source reduction, the Draft Plan estimates waste oil generation of 36,300 tons (10.4 million gallons), which is about 42.7% of all project hazardous waste streams.
4. In the "Capacity Needs Summary" the Draft Plan calls for an expansion of waste oil recycling capacity, recommending development of a 40,000 ton/annum (11.4 million gallons/year) facility.
5. The Draft Plan also shows a flow chart which assumes that waste oil recycling will generate process wastes which require incineration.
6. Evergreen's Newark facility can process up to 10-12 million gallons of waste oil per year, which is enough capacity to handle all of Alameda County's projected waste oil requirements with strict source reduction.

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HAYWARD, CALIFORNIA

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7. Evergreen uses state-of-the-art technology which generates no hazardous waste byproduct streams when recycling the waste oil. Incineration is not necessary for process waste disposal.
8. Evergreen has pollution legal liability insurance and environmental impairment coverage on its facility.
9. California Oil Recyclers, Inc. (CORI), a wholly owned subsidiary of Evergreen Oil, Inc. is the waste oil collector which supplies the Newark facility with the majority of its feedstock. CORI is recognized as the largest registered waste oil hauler in the State and also as the most professional.
10. Currently, Evergreen is not running at full capacity. It receives about 750,000 gallons of waste oil from within Alameda County with the balance of the waste oil coming from other counties. Evergreen is currently receiving and processing approximately 6-7 million gallons/year of waste oil.
11. Education of generators and the enforcement of existing regulations are key to waste oil recycling programs. Encouragement and support of recyclers who are complying with the rules and regulations is also necessary in order to promote an environmental acceptable alternative for the disposal of waste oil.

Evergreen has been in operation since the end of 1986 and looks forward to serving the needs of the community and protecting the environment for many years to come.

Please feel free to contact me if you have any questions about Evergreen's facility or its operations.

Best regards,  
EVERGREEN OIL, INC.

*John P. Fok*  
John P. Fok  
Environmental Manager

cc: C. Morgan  
P. Weiner

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TELEPHONE (415) 324-1638

October 24, 1988

Liz McElligott  
Hazardous Waste Planner  
Alameda County Planning Department  
399 Elmhurst Street  
Hayward, California 94544

Dear Ms. McElligott:

The impression that I was left with after our recent telephone conversation was that the County was busy preparing a new draft Hazardous Waste Management Plan. To aid your efforts in this task, I wanted to keep you up to day on our Newark site.

The transfer of ownership has recently been completed on the Resource Conservation and Recovery Act permit. Thus the Interim Status Document for storage of 2200 gallons in containers is now in the name of Romic Chemical Corporation East Bay Operation.

By November 8, 1988, Romic will have submitted to the California Department of Health Services a Part B permit describing the future development of this site. Our intentions remain to develop a state of the art rail transfer facility capable of handling 23,000 tons annually. The expanded EPA hazardous waste codes that we are and will be approved for are D001, D002, D004 -11, F001-5, F024, K001, K009, and K019. These are organic and inorganic waste stream exhibiting the characteristics of ignitability, toxicity or corrosivity. These are common industrial solvents and inorganic waste water streams.

Again, no processing of waste will occur at the Newark site. All processing will continue at our East Palo Alto and Chandler, Arizona facilities.

If you would like any further information on our operations, please do not hesitate to call. I will continue to keep you informed of our progress.

Sincerely,

Brad W. Lamont  
Operations Manager

BWL:vr

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**CITY OF HAYWARD FIRE DEPARTMENT**

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November 3, 1988  
ALAMEDA COUNTY  
PLANNING DEPARTMENT  
HAYWARD, CALIFORNIA

Liz McElligott  
Hazardous Waste Planner  
Waste Management Authority  
399 Elmhurst Street  
Hayward, CA 94544

RE: Alameda County Hazardous Waste Management Plan

Dear Ms. McElligott:

Since the decisions that you are about to make in the area of hazardous waste planning have significant implications to the cities in Alameda County, it is crucial that you have correct data at your disposal.

Table 306, Largest Waste Generators in Alameda County, of the Alameda County study on hazardous waste, shows that Davis Walker Corporation generated 604 tons of oily sludges in 1986. This number should have been listed as Metal-Containing Sludges.

In October, 1987, Davis Walker Corporation installed a dryer to process this Metal-Containing Sludge. This has reduced the company's volume of waste to less than one third of its 1986 volume and has reduced the weight of the waste from 604 tons per year to approximately 135 tons per year. This equates to a 78% reduction by weight.

In July of this year, Davis Walker Corporation installed an acid recovery system which has completely eliminated the disposal of the 4,120 tons of Metal-Containing Liquid shown in Table 306. This system enables them to use 100% of their acid and generate a new product, Ferrous Sulfate, which is sold for use in many different applications.

These changes reduce the total hazardous waste disposal of Davis Walker Corporation from 4,724 tons per year to 135 tons per year. This is a reduction of 97%.

This total reduction of 4,589 tons by Davis Walker Corporation causes the total waste generated in the City of Hayward, as show in Table 3.5, Waste Stream by Geographic Location, to drop from 7,305 tons to 3,716 tons.

We feel that this is significant information and that it needs to be reflected within the analysis of hazardous waste generated within Alameda County, as contained in the Alameda County Hazardous Waste Management Plan.

Sincerely,

Steve FaBar, Battalion Chief  
Hazardous Materials Coordinator

cc: M. Sweeney, Councilman, City of Hayward  
Department of Health Services