



## Department of Toxic Substances Control



Winston H. Hickox  
Agency Secretary  
California Environmental  
Protection Agency

Edwin F. Lowry, Director  
1515 Tollhouse Road  
Clovis, California 93611

Gray Davis  
Governor

July 22, 2003

Mr. Leroy A. Smith  
Occupational Health &  
Environmental Safety Manager  
UNICOR, Federal Prison Industries, Inc.  
United States Penitentiary  
1 Federal Way  
Atwater, California 95301

Certified #7001 0320 0003 1928 1342

Dear Mr. Smith:

On June 23, 2003, the California Environmental Protection Agency, Department of Toxic Substances Control (Department), conducted an inspection of UNICOR, Federal Prison Industries, Inc. United States Penitentiary, 1 Federal Way, Atwater, California. The enclosed report describes the findings of this inspection.

Because no violations were discovered during the inspection, no written response to this letter is required. The Department appreciates your efforts made to comply with hazardous waste laws and regulations.

All pertinent information derived from the inspection, including documents, photographs, and sampling results, are included as attachments to the report, except copies of documents provided by your facility at the time of the inspection. In order to reduce copying and mailing costs, these have not been returned to you with the report; copies will be provided if you request them.

This report will become a public document; you may request that any trade secret or facility security information be withheld from public disclosure. (See Health and Safety Code Section 25173 enclosed.) If you wish to assert the trade secret privilege after you have reviewed the report, please provide specific answers to each of the following questions, for each item of concern, within 10 days of receipt of this letter:

- 1 To what extent is there knowledge of the information conveyed by the photograph/document outside your business?
- 2 To what extent is there knowledge of the information conveyed by the photograph/document, by employees and others in your business?

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at [www.dtsc.ca.gov](http://www.dtsc.ca.gov).*

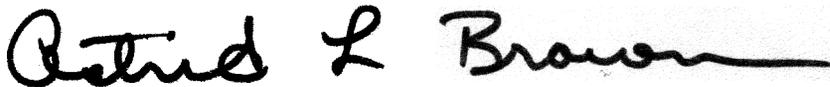
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3. To what extent have measures been taken to guard the secrecy of the information?
4. Is the information valuable to competitors? If so, why?
5. Has there been substantial monetary expenditure in the development of the information?
6. Could the information be easily and properly acquired or duplicated by others?

The Department will review your response for each item of concern to determine if the information in question should be treated as a trade secret and notify you accordingly.

If you have any questions regarding this letter, or if you wish to meet with the Department to discuss any questions or concerns you have with the inspection, please call Dr. AbdulHamid Beig, Hazardous Substances Scientist of the Statewide Compliance Division at (559) 297-3950.

Sincerely,



Astrid L. Brown, R.E.A.  
Unit Chief  
Statewide Compliance Division

Enclosure

cc: Mr. Jon McMillan Christenson  
Senior Environmental Health Specialist  
Environmental Health  
777 West 2nd Street  
Merced, California 95340

Excerpt from Health and Safety Code.

Section 25173. The department shall establish procedures to insure that trade secrets used by a person regarding methods of hazardous waste handling and disposal are utilized by the director, the department, or any authorized representative of the department only in connection with the responsibilities of the department pursuant to this chapter and that such trade secrets are not otherwise disseminated by the director, the department, or any authorized representative of the department without the consent of the person. However, any information shall be made available to governmental agencies for use in making studies and for use in judicial review or enforcement proceedings involving the person furnishing the information.

"Trade secrets", used in this section, may include, but are not limited to, any formula, plan, pattern, process tool, mechanism, compound, procedure, production data, or compilation of information which is not patented, which is known only to certain individuals within commercial concern who are using it to fabricate, produce, or compound an article or trade or a service having commercial value, and which gives its user an opportunity to obtain a business advantage over competitors who do not know or use it.

(Amended by Stats. 1986, Ct. 1187.)

# INSPECTION REPORT

## I. GENERAL INFORMATION

Company Name: UNICOR-Federal Bureau of Prisons Industries, Inc.

Facility Address: United States Penitentiary, 1 Federal Way / P.O. Box 019000  
Atwater, California 95301

Telephone Number: (209) 386-4601

EPA ID Number: CAL 000 220 479

Facility Type: Dismantling and demanufacturing used computers and monitors for recycling

Regulated Units: Hazardous Waste management units: Hazardous waste satellite accumulation and  
storage areas

Waste Streams: Contaminated air filters from the glass breaking operation, lead and cadmium glass /  
recyclable materials - Cathode Ray Tubes (CRT)

Regulatory Status: Notified the Department of Toxic Substances Control for Recycling Operation on  
October 1, 2001

Inspected by: AbdulHamid Beig, CPSS

Date of Inspection: June 23, 2003

Type of Inspection: FULL  FOCUSED  CME  O&M  LIMITED

Facility Rep.: Paul M. Schultz, Warden; Thomas Stahley, Associate Warden; Alan D. Booth, Associate  
Warden; Dave Clement, Western Regional Safety Administrator; and Leroy A. Smith,  
Occupational Health & Environmental Safety Manager.

Type of Business: Cathode Ray Tube Recyclable Materials Handler

## II. CONSENT

Consent to conduct inspection that involves: taking photographs, reviewing and copying records, questioning personnel and inspecting hazardous waste handling areas.

Consent given by (name and title): Paul M. Schultz, Warden; & Leroy A. Smith, Occupational Health &  
Environmental Safety Manager

Consent refused by (name and title): \_\_\_\_\_

## III. DOCUMENTS REVIEWED (circle all reviewed)

- a. Manifests, Bills of Lading, LDR's and Exception Reports:  
 UNICOR generated three hazardous waste manifests since the start of recycling operation in 2002 (Attachment B).
- b. Contingency Plan:  
 Reviewed. No violations were observed at this time.

## Inspection Report

### **NARRATIVE OF OBSERVATIONS/DISCUSSION WITH OPERATOR, continued**

Mr. Stahley, Mr. Booth, and Mr. Smith joined. After introductions, I stated that the purpose of our visit was to perform a compliance evaluation inspection for CRT material handler facility and asked for permission to conduct the inspection which was granted by Mr. Schultz and Mr. Smith.

Upon my request Mr. Stahley gave us a brief description of their recycling operation. Mr. Stahley explained that all the used computer and monitor loads received at UNICOR are preapproved. After the load is received it is visually inspected for its usability. The monitors, connectors, cables, plastic, wires, boards, "bezel" (plastic that forms the screen border of the monitor), and the bare tube assembly are dismantled. All these parts are kept separately and are picked up for offsite recycling. The tube assembly is taken to the glass breaking area (Booth), where it is crushed. This glass breaking area is air monitored and UNICOR is working with San Joaquin Valley Air Pollution District for safety of the workers and air pollution issues. UNICOR at present uses closed area, air flow patterns and air filters for regulatory compliance of particulate pollution. Used air filters are hazardous and are manifested offsite to Safety-Kleen Systems, Inc., Denton, Texas (Attachment B).

Astrid and I reviewed the documents stated in section III above. The results of the documents review is recorded in each section. We were then escorted to the dismantling building, where we inspected the computer / monitors dismantling, and tube breaking and band deglassing (Booth). The booth was not in operation at the time of inspection. Mr. Stahley stated that booth was temporarily shut down pending personnel physical examination and blood test results. Mr. Stahley stated that the booth for tube breaking was installed on May 1, 2002.

Mr. Stahley explained, the booth size is 10 feet X 20 feet. The entry to the booth has a row of vinyl transparent curtains. Inside the booth there are three rows of vinyl transparent curtains to help facilitate air flow to the filter bank:

- i) Row one is between the panel glass table and the deglassing table,
- ii) Row two is between the panel glass table and the funnel glass table, and
- iii) Row three is between the funnel glass table and the monitor staging table.

These curtains keep all glass and particulate within the confines of the booth and help create negative air pressure within the booth which in turn facilitates air flow to the filter bank. Four exhaust registers operate at the rear of each breaking table. The registers vent directly into the filter bank through a six inch flexible hose. These registers help reduce the amount of air borne particulate in and around the breaking stations, stated Mr. Stahley. Mr. Stahley also explained that all twelve inmates assigned to work in the booth are fit tested and wear appropriate safety equipment during the operation. They were all given the base medical examination and are periodically monitored.

Under the escort, we then inspected the warehouse for receiving the recycling materials and the hazardous waste storage shed. No violations were observed at this time.

We then went back to the conference room and I prepared the Summary of Observations. Mr. Schultz signed the Summary of Observations (Attachment D) and kept a copy for his record. I thanked Mr. Schultz, Mr. Stahley, Mr. Booth, and Mr. Smith for their cooperation during the inspection. We then left the facility.

## Inspection Report

- c. Training Plan and Records:  
Reviewed. No violations were observed at this time.
- d. Incident Report:  
None.
- e. Waste Analysis Plan and Records:  
Not Applicable (N/A).
- f. Operation Log:  
N/A
- g. Inspection Records:  
N/A
- h. Tiered Permitting Applications and Authorization Letters:  
None  
Annual/Biennial Reports:  
N/A  
SB 14 Plans:  
None
- k. Closure Cost Estimates and Updates:  
N/A  
Part A:  
N/A
- m. Part B:  
N/A
- n. POT, Compliance Data:  
N/A
- o. Tank and/or Containment Certifications:  
N/A
- p. Air Board Permits:  
Unicor is currently working with San Joaquin Valley Air Pollution Control District to improve/modify the Glass breaking booth (Attachment C).
- q. Variances:  
None
- r. Recycling Records:  
Reviewed. No violations were observed at this time.  
Other:

## **IV. NARRATIVE OF OBSERVATIONS/DISCUSSION WITH OPERATOR**

### **Background**

UNICOR, Federal Prison Industries, Inc., United States Penitentiary (UNICOR) submitted Cathode Ray Tube (CRT) material handler notification on October 1, 2001, pursuant to title 22, California Code of Regulations, section 66273.82. UNICOR applied for and received a California Environmental Protection Agency (EPA) identification number on March 14, 2001 (Attachment D).

Astrid L. Brown and I arrived at UNICOR on June 23, 2003 and asked the receptionist to see Mr. Smith. The receptionist escorted us to the conference room, where we met with Mr. Smith and Jon Christenson, Senior Environmental Health Specialist, Merced County Certified Unified Program Agency. Soon thereafter Mr. Schultz,

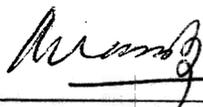
Inspection Report

**V. VIOLATIONS**

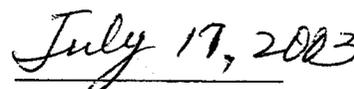
	Yes	No
Summary of Violations attached?		<u>X</u>

**VI. CONCLUSIONS**

During the out briefing I discussed my observations with the facility participants listed above in section I, and asked them if they had any questions or issues that they would like to discuss. Their response was negative. I then asked Mr. Christenson of Merced County CUPA, if he had any issues that he would like to discuss and he responded by saying "no".



AbdulHamid Beig, CPSS  
Hazardous Substances Scientist



Date