



FACT SHEET

WASTE QUANTITY RECORDS

CASMALIA DISPOSAL SITE

This document describes the types of records that the U.S. EPA used to determine the waste quantity, in pounds, of each shipment of waste sent to the Casmalia Disposal Site (“Site”).

GENERAL BACKGROUND: TYPES OF RECORDS MAINTAINED BY CASMALIA RESOURCES, INC.

At the Site, shipments of waste material were recorded by two means:

- C **Waste Hauler Record** (for convenience, all such records will hereinafter be referred to as “manifests” or “waste shipment manifests”) This form was originally created by each waste generator and later standardized by federal and state government agencies; the generator or transporter of the waste material completed this form prior to disposal; and
- C **Weigh Ticket** This document was generated by weigh scales operated from 1977-1989 by a certified weigh master at the Site.

DOCUMENT HISTORY AND CREATION OF THE DATABASE

The Site, formerly known as the Casmalia Resources Hazardous Waste Management Facility (“Facility”) began operating in 1973. From 1973 until October 1977, the Facility’s customers - waste generators and transporters - deposited their completed manifests at the Facility prior to disposing of their waste materials. Casmalia Resources, Inc., an owner and operator of the Site, used these documents, along with billing tickets, to generate monthly customer bills.

In October 1977, Casmalia Resources Inc. installed a scale to obtain the gross weight of each delivery truck as it entered the Facility and the empty truck weight (“tare weight”) as it left the Facility. The scale issued a weigh ticket that calculated and recorded the net weight of the waste shipment. As a general rule, the certified weigh master, an employee of Casmalia Resources, Inc. who was trained to operate the scales, also recorded the weigh ticket number and net weight of the load on the waste shipment manifest. The weigh tickets, along with the manifests, were used to generate the monthly customer bills after September 1977.

In 1983, Casmalia Resources, Inc. installed a computer data base system for maintaining information from the waste shipment manifests and weigh tickets, along with other relevant information about its customers and the waste itself.

This database contains virtually all the information related to an individual waste shipment, including each customer’s name, address and U.S. EPA identification number, the waste transporter’s name and U.S. EPA identification number, the load weight, and waste description.

In 1992, the U.S. EPA's National Enforcement Investigation Center ("NEIC") reviewed the Casmalia Resources, Inc.'s 1983-89 waste database for reliability and accuracy. NEIC compared the manifest information in the database to actual manifests. As a result of this review, NEIC estimated a 98% or better confidence limit on the data in the database. This means that the 1983-89 waste database is highly reliable for assigning a quantity of waste to individual customers. Casmalia Resources, Inc.'s original waste data base for the 1983-89 period contains approximately two-thirds of all the waste disposed of at the Site during the Facility's seventeen year operational history.

The U.S. EPA's determination of the quantity of waste sent to the Site by an individual customer is based on the following sources of data, currently stored in a single computerized waste database:

- C For the 1973-1982 period, waste shipment manifests (in microfiche form), and California Regional Water Quality Control Board Monthly Reports obtained from Casmalia Resources, Inc.; and
- C For the 1983-1989 period, computerized files containing information from weigh tickets and waste manifests separately obtained from Casmalia Resources, Inc.

DETERMINATION OF WEIGHT BY SHIPMENT

In order to allocate each customer's share of the total waste at the Site, it was necessary to convert all waste shipments to a uniform measure of waste quantity. The most reliable and logical unit of measure for all waste shipments was weight as measured in pounds. This reliability stems from the fact that the vast majority of the waste shipments were weighed at the Facility. The process for determining the weight in pounds for each shipment from the available facility records is described below.

1973-1982 WASTE SHIPMENTS

For the period from 1973-1982, the U.S. EPA relied on information obtained from waste shipment manifests. These documents do not always identify the weight in pounds of each waste shipment. It was necessary, therefore, to establish standard conversion factors to assign a weight in pounds to each waste shipment. The following conversion factors were applied:

- C **Barrels** were assumed to be 42-gallon barrels;
- C **Drums** were assumed to be 55-gallon drums;
- C **Gallons** were multiplied by a conversion factor of 8.34 lbs. per gallon (*i.e.*, the weight of water);
- C **Yards** were assumed to be cubic yards;
- C **Cubic yards** were multiplied by a conversion factor of 1,500 lbs. per cubic yard (*i.e.*, the weight of soil)
- C **Carboys** were multiplied by a conversion factor of 10 gallons;
- C **Pails** were multiplied by a conversion factor of 5 gallons;
- C **Boxes, Bags, Cartons and Buckets** were multiplied by a conversion factor of 2 gallons; and
- C **Bottles** were multiplied by a conversion factor of 1 gallon.

1983-1989 WASTE SHIPMENTS

For this period, Casmalia Resources, Inc.'s computerized waste database contained the weight (in pounds) of each shipment of waste. This information was obtained from the weigh tickets generated by the scales used to weigh shipments. The U.S. EPA considers the weigh ticket file information to be the most reliable measure of the weight of each shipment that is available, because the ticket was generated by weigh scales regulated by the State of California and operated by certified weigh masters. In addition, the information from the weigh tickets was generally used for billing purposes. This stems from the fact that the State of California Board of Equalization required that taxes be assessed based on the weight of each waste shipment. As a result, the weigh ticket information was subject to challenge by Casmalia Resources, Inc.'s customers at the time of billing.