BERMITE

Bermite Division
Whittaker Corporation
22116 West Soledad Canyon Road
Saugus, California 91350
805/259-2241 213/629-1403
TWX 910-336-1117

Whittaker

(A)

May 15, 1984 (51)

CAD 064573108

Mr. Dan Shane
U.S. Environmental Protection Agency
215 Fremont Street
San Francisco, California 94103

Dear Mr. Shane:

Bermite received its plans for an above ground storage facility with the Environmental Protection Agency and the State of California Department of Health Services. We maintained liaison with the DOHS during pre-closure and notified them of our post-closure activity. We have made every effort to comply with both Federal and State law as we understood them and acted upon information provided to us by the multifarious agencies claiming jurisdiction in these matters.

Very truly yours,

Loyd R. Luce

Loyd R. Luce, Vice President
Human Resources

BERMITE

Bermite Division
Whittaker Corporation
22116 West Soledad Canyon Road
Saugus, California 91350
213/629-1403 805/259-2241
Telex 651436

Whittaker

January 6, 1983

CAD064573108

Mr. William D. Wilson
Chief, Technical Assessment Section
United States Environmental Protection Agency
Region 1X
215 Fremont Street
San Francisco, CA. 94105

Ref: Our Phone Conversation of January 3, 1983

Dear Mr. Wilson:

The Bermite Division, Whittaker Corporation, request that our status as a TSDF be changed to that of a generator for the following reasons:

1) Waste generated at Bermite, with one exception, is turned around within ninety days.

2) Material formally declared as waste is now handled as in-process material that will be recycled.

3) We have sought out, and utilize, vendors who recycle our waste.

4) Although we still burn off N-29 Propellant waste on-site under our Emergency Burn Permit issued by the L.A. County Fire Department, we do not burn off waste generated by other companies. In this respect we fall under the same category as other ordnance manufacturers in California who are not registered as TSDF's but burn off waste generated by themselves at their facility.

Because of the unique nature of the ordnance manufacturing industry we request that a follow-up meeting to this letter be arranged so that we can present documentation to support our request.

Very truly yours,

Boyd R. Luce

Boyd R Luce, Vice President
Human Resources

CAD 064573108
File

BERMITE

Bermite Division
Whittaker Corporation
22116 West Soledad Canyon Road
Saugus, California 91350
213/629-1403 805/259-2241
Telex 651436

Whittaker

October 28, 1982

Mr. Bill Wilson
Environmental Protection Agency - Region 9
T-2-1
Toxics Division
215 Fremont Street
San Francisco, California 94105

Ref: E.P.A. Inspection by Dan Shane and Randy Marcus on 9/22/82

Dear Mr. Wilson:

Our hazardous inventory list was reviewed during the inspection of our facility on 9/22/82. At that time agreement was reached to remove several materials from our inventory as hazardous waste. I am sending you a copy of the revised list as it was amended at that time to avoid any confusion in interpretation since the revision was made by your departmental representatives.

Please call my office if you have any questions on this matter.

Very truly yours,

BERMITE DIVISION
WHITTAKER CORPORATION

Zoyd R. Luce

Zoyd R. Luce, Vice President
Industrial Relations

cc: Mr. R. Marcus
Environmental Scientist
U. S. Environmental Protection Agency
215 Fremont Street
San Francisco, California 94105

No action needed
11/3/82

DRAFT

III. Emergency Precautions

A. Nearest Hospital Emergency Room (Address & Telephone):

B. Transportation (Telephone Numbers)

1. Fire: FACILITY
2. Police:
3. Ambulance: ACTIVE

C. Poison Control Center: S.F. Bay Area 1-800-792-0720

D. Personal First Aid:

E. On-Site Alarms:

IV. Equipment Checkout

Personal Protective Equipment

Personal Clothing, Level "D":
Coveralls - Chemical Resistant: TYVEK-SARAMEX ✓
Boots/Shoes - Safety Steel Toed:
Boots - Reusable, Chem. Resistant - Steel Toe: ✓
Boots - Outer, Chem. Resistant Throw-Away: ✓ BOOTIES
Robert Shaw Escape Mask:
Safety Glasses or Goggles: ✓
Hard Hat (Face Shield Optional): ✓
Gloves → NITRILE RUBBER (GREEN) ✓
Other:

Emergency Equipment

First Aid Kit:
Eye Wash Kit:
Drinking Water Supply:

Survey Equipment

Explosimeter: } GASTECH O_2-LEL MONITOR ✓
O_2 Meter: }
Radiation Survey Meter:
Drager Detector Tubes (HCN & others as needed):
HNU Photoionizer:
Metal Detector: ✓
Handie-Talkies (2-Way Radios):

APPROVALS:

Safety Plan Prepared By: D. Shane Date: 9/17/82
Health & Safety Officer: Richard Tait 9-17-82
Section Chief: Robert S. Peterson ASC 9/17/82

DAN SHANE
RANDY MARCUS

MAP 9-3 5-1-81 RMT

EPA REGION 9
SURVEILLANCE & ANALYSIS DIVISION
AIR & HAZARDOUS MATERIALS BRANCH
HAZARDOUS MATERIALS SECTION

DRAFT

SAFETY PLAN FOR RCRA INVESTIGATIONS

Site: WHITTAKER CORP Location: SANGUS, CA.

Purpose: RCRA INSPECTION - INVESTIGATIVE ACTIVITIES: ADMINISTRATIVE, VISUAL OBSERVATION OF STORAGE AREAS by WALKING SITE.

I. Physical Description of Site:

A. Describe site layout, include method(s) of chemical storage (i.e. - warehouse, evaporation ponds, drums, etc.). Also note whether heavy equipment (lift trucks, trucks, tractors, etc.) is operated in the storage area.

Administrative visit and walk-through of chemical storage area. Chemical storage in Drums + Surface Impoundments. RED phosphorus, TITANIUM TETRACHLORIDE + sulfuric acid stored in one lagoon and methylene chloride, ammonium perchlorate + water stored in second lagoon. DOHS reportedly has approved the mixtures of waste streams.

B. Indicate which of the following information sources were consulted in preparing IA: State and/or Local Agency, State and/or Federal OSHA, NIOSH, EPA files, Site Operator and Local Fire Dept. Note: a minimum of two sources are required.

EPA files, DOHS, SITE OPERATOR

NO SAMPLING IS TO BE PERFORMED.

II. Health and Safety Considerations

Areas of Concern	Hazard Potential	Precautions
Explosion:	POSSIBLE	O_2-LEL MONITOR [O_2 > 19.5% LEL < 10%]
O_2 Deficiency:		
Radiation:		
Toxic Gases: a. General (HNU meter)	POSSIBLE	HNU PHOTOIONIZATION
b. Specific: (HCN Detector Tube)		LEAVE AREA IF READINGS > 5ppm ABOVE BACKGROUND
Skin/Eye Contact:	spillage on ground	SAFETY SHOES.
Falling Objects:	LOW POTENTIAL	HARD HAT.
SURFACE IMPOUNDMENTS	MODERATE	MAINTAIN 10 FT. DIST.

WHITTAKER

Page 2.
Copy this page before completing. You may use more than 20 wastes to list.

Form Approved OMB No. 158-S80004

I. NUMBER (enter from page 1): D 0 6 4 5 7 3 1 0 8

FOR OFFICIAL USE ONLY: W DUP 2 DUP

DESCRIPTION OF HAZARDOUS WASTES (continued)

No.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	U186	40,000	P	S01	1-1-1 Trichloroethane ~~Perchloroethylene~~
2	U080	200	P	S01	Dichloromethane ?
3	U019	13.2	P	S01	Benzene ?
4	U002	1594	P	S01	Acetone (I)
5	U223	2,000 lb red phosphorous in 70,000gal	-	S04	------
6	U223	1,000	P	S01	~~(Red Phosphorous)~~ Red Phosphorous
7	D001	2641	P	S01	Hexane (I)
	D003	2	P	S01	Lead Azide (R)
	D002	7200	P	S01	Oakite Stripper (C)
	D003	41,000	P	S01	Propellant: Ammonium Perchlorate, Aluminim, organic binders (R)
	D001	50	P	S01	Carbon Black (I)
	D003	500	P	S01	Propellant: Polysulfide rubber, (C) Iron oxide, ammonium perchlorate
	D001	1,100	P	S01	Ammonium Perchlorate (I)
	D003	1,000	P	S01	Magnesium/Teflon/Viton (C)
	D003	500	P	S01	Black Powder (R)
	D003	20	P	S01	RDX (R)
	D003	50	P	S01	~~[illegible]~~ (R)
	D003	125	P	S01	~~NEI pellets~~: RDX and aluminum (R)
	003	1	P	S01	~~Detonator Cord~~ (R)
	003	96 count	-	S01	~~Booster Assembly Warhead~~ (R)
	003	50	P	S01	~~[illegible]~~ (R)
	003	60,000 count	-	S01	M 57 Detonators (R)
	003	100 count	-	S01	~~Electric Blasting Cap~~ (R)
	003	6	P	S01	~~Barium/Potassium Nitrate~~ (R)
	003	115	P	S01	Aluminum/Potassium Perchlorate (R)
	003	600 count	-	S01	Shotgun Primer (R)

W'LITTA.

2.

this page before completing if have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

NUMBER (enter from page 1)

0 6 4 5 7 3 1 0 8 1

FOR OFFICIAL USE ONLY

W DUP 2 DUP

SCRIPTION OF HAZARDOUS WASTES (continued)

A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
D003	600 count	-	S01	Fuze Primer (R) *
D003	4,500 count	-	S01	M 42 Primer (R) *
D003	2,000 count	-	S01	Igniter (R) *
D003	5,000 count	-	S01	Squib (R) *
D003	10,000 count	-	S01	Practice Bomb (R) *
D003	8 count	-	S01	~~[illegible]~~ (R)
D003	2,000 count	-	S01	Booster Assembly (R) *
D003	2,000 count	-	S01	Fuze (R) *
D003	25 count	-	S01	Gas Generator (R) *
D003	½	P	S01	~~[illegible]~~ (R)
D003	150 count	-	S01	~~[illegible]~~ (R)

* Surplus inventory.

BERMITE

Bermite Division
Whittaker Corporation
22116 West Soledad Canyon Road
Saugus, California 91350
213/629-1403 805/259-2241
Telex 651436

Whittaker

August 5, 1981

UNITED STATES ENVIRENMENTAL PROTECTION AGENCY
Region IX
215 Fremont Street
San Francisco, CA 94105

Attention: William D. Wilson
Hazardous Materials Branch

Dear Sir:

Per my telephone conversation on August 5, 1981 with Penny Williamson, please note the following changes on the enclosed form:

Page 2, line 3 changed from 15 G (gallons) to 13.2 P (pounds)

Page 2, line 4 changed from 2000 G to 1594 P

Page 2, line 5 changed from T02 to S04

Page 2, line 7 changed from 4000 G to 2641 P

Page 2, line 9 changed from 6000 G to 7200 P.

Yours truly,

George Abramson

George Abramson
Manager, Safety and Health

cc: D. Moore
Z. Luce

C. May (Corporate Legal)

BERMITE

Bermite Division
Whittaker Corporation
22116 West Soledad Canyon Road
Saugus, California 91350
213/629-1403 805/259-2241
Telex 651436

Whittaker

March 23, 1981

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IX
215 Fremont Street
San Francisco, CA 94105
Attention: Mr. William D. Wilson
Hazardous Materials Branch

Dear Mr. Wilson:

Per your letter of February 26, 1981 (copy attached), please find corrected EPA form 3 RCRA, HAZARDOUS WASTE PERMIT APPLICATION.

Please note that I have inserted the name of the item under "process description" to supply you with added information about the material. Also, where a count is more appropriate for certain items, it is so noted.

We hope that this information now meets your requirements. If further information is needed, do not hesitate to contact me at (805) 259-2241.

Very truly yours,

George Abramson

George Abramson, Manager
Safety and Health

GA:sh

cc: D. Moore
Z. Luce
C. May (Corporate Legal)

CAD064573108

Whittaker

Legal Department
Whittaker Corporation
10880 Wilshire Boulevard
Los Angeles, California 90024
213/475-9411

File Number

November 18, 1980

EPA Region IX
ATTN A-3-2
215 Fremont Street
San Francisco, CA 94105

Re: WHITTAKER CORPORATION - BERMITE DIVISION -
EPA ID NO. CAD064573108

Gentlemen:

Enclosed is the Part A, Forms 1 and 3 for the Bermite Division of Whittaker Corporation.

Very truly yours,

Carol S. May

Carol S. May

CSM/hf

Enclosures

cc: Zoyd Luce w/encl.
Stan Weissberg
Al Simmons

NOTE TO THE FILE

Date: March 6, 1992

From: Tim Sullivan
H-4-1

To: Whittaker Corp. - Bermite Division Files
EPA ID # CAD064573108

Subject: Status of Return to Compliance Study Facilities

In order to determine the status of Region IX facilities listed in the 1991 Return to Compliance Study, the RCRA Enforcement Section looked into recent developments in those cases. In most instances, the facilities had come substantially into compliance with regard to those violations identified in the Study, although the HWDMS data base (which the RTC Study used for much of its data) did not reflect those corrections.

The attachments to this memo document the conclusions reached after studying the facts of each case and the changes made to the RCRIS data base as a result of our findings. It is hoped that these data base changes will provide a more accurate picture of the status of the RTC Study facilities in the event of future inquiries.

Attachments

WHITTAKER - BERMITE DIV.

Inspection	Agency	Violations
*06/25/85	E,COF	CLPC
*06/25/85	S	CLPC,FIN
09/25/85	E,FIN	FIN
10/18/85	S,FIN	FIN
03/21/86	S,FIN	FIN

Enforcement: Above inspections addressed with admin complaint of 6/3/86 and CA/FO of 8/26/86.

----------First RCRIS inspection below----------

06/25/90	S	GWM

Enforcement: This violation addressed with CA/FO of 1/16/91.

RTC Study Violations: CP; GW; FR.

Original Violations: The admin complaint of 6/3/86 listed eighteen counts, including: failure to implement a GWM program; failure to provide a closure plan; failure to properly close; failure to provide financial assurance of closure; failure to demonstrate liability coverage.

Inspections Showing No Violation:

05/21/87	S,M	CLPC (no vio)
06/07/87	S	CLPC (no vio)
06/07/88	S,FIN	FIN (no vio)
05/02/89	S,FIN	FIN (no vio)

Status:
(See Attachment)

Facility has returned to compliance with all original violations or original violations are now irrelevant. Many of the original violations pertain to units which were previously closed improperly. Because facility's closure plan has been approved and is being implemented, all violations have been adequately addressed.

Financial violations were dropped during negotiations either because the facility had corrected the violations or provided information showing that no violation took place.

The facility is currently involved in assessment groundwater monitoring to characterize the extent of contamination at the site. Therefore, the original violation of lack of a detection monitoring program now seems irrelevant.

Proposed Data Changes:
Add State FRR of 06/25/85 (and corresponding enforcement actions according to HWDMS) showing DCL and DFR violations. Add EPA CEI of 06/25/85 (and corresponding enforcement actions according to HWDMS) showing DCL and DGW violations. Both inspections correspond with "violations identified" date in RTC Study. The DFR violation did not appear in the CA/FO, presumably because the facility provided information showing that no violation took place or that the

violation had been corrected. Therefore, the actual date (07/02/86) is entered as the date of the facility's response to the complaint, at which time the facility presumably supplied additional information regarding the violation. The actual date for the DGW violation is entered as 12/31/89, because according to a memo prepared by Lily Wong, wells designed to characterize contamination were installed at the facility between 1988 and 1989. 12/31/89 is the last day of that period. The actual date for the DCL violation is entered as 08/16/86, which is the date listed in Lily's memo as the date the final closure-related submittal was made.

NOTE TO THE FILE

Date: 12/10/91

From: Lily Wong
Compliance Officer, H-4-1

To: Whittaker Bermite Files
CAD064573108

Question: Has the facility returned to compliance with the violations which caused it be in significant noncompliance (SNC) back in 1985?

Background

This facility was one of the Return to Compliance Study facilities. The RTC Study was conducted by EPA Headquarters and designed to evaluate factors which contributed to facilities remaining out of compliance for prolong periods of time. We are taking another look at the question as to whether this facility has returned to compliance with the SNC violations. The SNC violations at this facility fell into these 3 categories: gwm, cl/pc, financial.

Conclusion

We can conclude that the facility has returned to compliance with all the original SNC violations. Up to now, we have not designated RTC primarily because the facility is still working on issues related to groundwater contamination and attempting clean closure. However, a look at the original SNC violations allows us to conclude that the facility has RTC. The discussion below provides the rationale for the RTC determination.

Discussion

1. **Closure:** The original complaint had 5 counts which pertained to closure. They were as follows (the original Count number is indicated in roman numeral):

X.	Deficient closure plan (265.112(a)	CA/FO ¶ A → CP submitted; compliance task done
XI.	No submittal of CP for approval prior to closure (265.112(c)	No compliance task, issue now moot point

XII.	No closure ce: .fication for previously closed unit (265.115)	CA/FO ¶ B → .ow moot point
XIII	Did not demonstrate compliance with closure performance stds with previously closed unit (265.228)	CA/FO ¶ C → compliance tasks done 8/16/86
XVI.	Closure cost estimate was not updated (265.142(b))	CA/FO ¶ D → compliance task done 8/7/86

Resolution of closure violations: Many of the original violations pertain to units which were previously closed improperly. Because the facility submitted a closure plan which was approved 9/87 and is being implemented (or potentially completed), all the violations or concerns noted above have been adequately addressed.

2. **Financial assurance:** The original complaint had 2 financial responsibility counts. They are as follows:

XV.	No liability insurance (265.147(a),(b), & (e)	Dropped during negotiations. While I did not participate in the negotiations, it appears that EPA was convinced that the facility was already in compliance.
XVII	Financial assurance not adequate since cost estimate was not updated (265.143)	Dropped during negotiations. While I did not participate in the negotiations, it appears that EPA was convinced that the facility was already in compliance.

Resolutions of Financial Assurance violations: During negotiations, the counts were dropped. It appears that EPA was convinced that the facility was already in compliance and/or the facility was never in violation.

3. **Groundwater Monitoring:** The original complaint contained the following groundwater monitoring violation:

XIV.	Facility doesn't have a groundwater monitoring program (265.90 - 94)	In compliance. Groundwater monitoring program installed during 1988-89.

Resolution of Groundwater Monitoring violations: When EPA determined that the facility once had land disposal units, EPA also determined that the facility did not have a detection groundwater monitoring system in place. During 1988-89, a groundwater monitoring system was installed. Because contamination was detected, the facility moved onto the groundwater assessment mode and was trying to characterize the extent and nature of the plume. Since the original violation was lack of a groundwater monitoring program, the facility has complied with this requirement by installing a groundwater monitoring system even though they are currently involved in assessment groundwater monitoring.

Diamond

Stan - by the virtue of the fact that Whittaker-Bermite cannot clean close, I think the D83 designation is appropriate now (S04 may have been ok before) Jane

April 13, 1990

MEMORANDUM

SUBJECT: Whittaker Corp. - Bermite Division
CAD064573808
Saugus

FROM: Stan Brown H-2-3

THRU: George Wilson, Chief
RCRA Resource Management Section

TO: James Breitlow, Chief
Permits Section

Attached is the revised Part A application for Whittaker - Bermite along with a Fac Master for the facility. There are discrepancies among the revised Part A, Fac Master and the Closure Spar.

- o Both the revised Part A and the Fac Master indicates that the facility had S04 - a surface impoundment for storage of hazardous waste.

- o The Closure Spar indicates that a closure plan was approved on September 30, 1987 for D83 - a surface impoundment for disposal.

There is obvious confusion regarding the correctness of the codes as to whether this facility stored or disposed and this should be resolved in order for HWDMS to be accurate.
In the mean time, I am reluctant to approve and enter the Part A modification into the data base without more information about this facility.

After you have had a chance to review my memo and the attachments, please give me a call at 546-0749. After hearing from you, I would like to set up a meeting with the appropriate parties to discuss the issue of data base discrepancies. ssI

believe the meeting should include yourself, George Wilson, Jane Diamond, Lorie Lewis, Bess Gordon and myself. If you can think of others, please let me know.

cc: Jane Diamond
Lori Lewis
Bess Gordon

CAD064573108

Note to the File

Re: HQ-REGIONAL PROJECT ON RETURNING FACILITIES TO COMPLIANCE

OWPE is conducting a study to identify the prevalent factors that cause facilities to take a long time to return to compliance (see Bruce Diamond memo of 10/18/89). This study is being conducted in response to and in anticipation of inquiries from Congressman Dingell. The attached summary provides an update on the compliance status of the specific facility by describing if the facility has returned to compliance, or alternatively, by describing the progress the facility has made in that regard, and the reasons as to why it has been so difficult for the facility to return to full compliance.

WHITTAKER CORP. - BERMITE DIVISION 12/14/89
CAD064573108

Compliance Status Summary:

The facility has addressed the vast majority of the deficiencies which were the bases for the issuance of the enforcement orders in 1986. However, the facility has not returned to full physical compliance because compliance is linked with the facility's continuing efforts to achieve "clean closure" by remediation of residual contamination.

Background:

In 1985 when many of the violations were discovered, the facility was an operating TSD. EPA issued a 3008(a) administrative order for 18 RCRA violations, including closure/post-closure and financial responsibility deficiencies which resulted in the facility's SNC status. The facility is no longer treating, storing, or disposing hazardous waste, and has been in the closure process since 1986. The following provides a partial chronology of events since 1986, which describes the progress the facility has made in addressing the remaining unresolved closure/post-closure violation.

On 6/3/86, EPA issued a 3008(a) administrative order to the facility for 18 violations which included deficiencies of the closure/post-closure and financial responsibility requirements. On 8/26/86, EPA and the facility signed a consent agreement which placed the facility on a schedule to correct the remaining closure/post-closure deficiencies. This consent agreement required the facility to provide documentation to support the facility's assertion that the 1983 closure of surface impoundments, which was conducted without an approved closure plan, constituted "clean closure."

During 1986 - 1987, additional monitoring data (soil sampling and soil gas data) was gathered, which showed that soil contamination remained. EPA and the State determined that the 1983 closure work did not constitute "clean closure." As a consequence, the closure plan which was approved 9/87 required additional characterization and remediation of the soil contamination. Because of the facility's desire to pursue "clean closure," the closure plan required the installation of a groundwater monitoring system to demonstrate that the groundwater had not been affected.

During 1988 - 1989, the facility installed a groundwater monitoring system and conducted three quarters of groundwater monitoring. On 4/89, the facility detected organic solvents in a monitoring well. The facility is now in the process of implementing a groundwater quality assessment program pursuant to 40 CFR 265.93.

The original SNC violations included failure to conduct proper closure of the surface impoundments. Because the facility would like to achieve clean closure, much more work remains to be done in order to remediate the residual contamination.

For more information, contact:
Lily Wong, H-4-1, Region 9
FTS 484-1640

The information contained in the enclosed Application is substantially that submitted on behalf of Whittaker by Wenck Associates on July 6, 1989, and has not, at this time, been independently confirmed by the Partnership or Anden. In the interest of time and facilitating prompt commencement of the notice and review procedures, we have instead incorporated for purposes of this Application the statements already submitted to you in the enclosed prior Application. As we understand you are aware, since that prior Application an NPDES Permit has been issued for the discharge of the treated ground water. If you prefer, we will submit another revised Part A Application deleting the ground water treatment activity.

The enclosed form is submitted for your immediate attention, in light of the imminent contribution of the property to the Partnership, which, upon satisfaction of certain matters addressed in the Partnership Agreement, will occur on March 13, 1990.

In order to facilitate completion of the transaction and in light of the very limited nature of operations at the facility and Whittaker's continued relationship with the facility through its interest as limited partner, the Partnership requests the Department's approval to transfer ownership and operation of the facility on March 13, 1990. We understand that the inability of Whittaker to transfer ownership by March 13, 1990, as contemplated by the Partnership Agreement of the Partnership, could jeopardize Whittaker's continued participation in the Partnership and its ability to complete the transaction.

We are assured that Whittaker will continue to comply with the financial responsibility requirements for the facility until they are assumed by the Partnership in accordance with applicable regulations. We anticipate filing financial responsibility documents for the Partnership and, if necessary, Anden as its general partner, within the next few days and well in advance of the requirements of 40 CFR 270.72. Please contact me if you have any comments or require additional information.

We look forward to your prompt response and, hopefully, approval of the transfer.

Very truly yours,

L. DAVID COLE

LDC:jb
Enc.

cc: Mr. John Hinton, Chief
State Department of Health Services

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

January 6, 1987

CERTIFIED MAIL

Zoyd Reed Luce, Director
Whittaker Corporation - Bermite Division
22116 West Soledad Canyon Road
Saugus, California 91350

In reply refer to: T-2-1
CAD064573108

Dear Facility Owner/Operator:

This letter is a follow up to the "Warning Letter" sent to you from EPA in September 1986. Our records show that your company or agency returned the Generator report rather than the Facility Biennal Report (EPA form 8700-13B) as requested.

The Facility report is to be completed by facilities which treat, store (over 90 days) or dispose (TSD) of hazardous waste on the facility property.

The facility report form includes a place to mark "Non-regulated Status" and an area to explain this determination. Use extra paper if necessary. Also address whether or not the facility has ever engaged in TSD activity.

Please complete the enclosed facility report within thirty (30) days of receipt of this letter and return photocopies to the following agencies:

California Dept. of Health Services
Toxic Substances Control Division
Hazardous Waste Management Section
P.O. Box 3000
Sacramento, CA 95814

U.S EPA
Waste Programs Branch
RCRA Programs Section (T-2-1)
215 Fremont St.
San Francisco, CA 94105

If you have any questions regarding the reporting requirements, please call Cheryl Lehr at (415) 974-7520 or Bob Hosea of DOHS at (916) 322-3913.

Sincerely,

Michael Feeley
Chief
RCRA Programs Section

Enclosure
cc: Bob Hosea DOHS

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

Angelo Bellomo, Chief
Southern California Section
Toxic Substances Control Division
CA Dept. of Health Services
107 South Broadway, Room 7011
Los Angeles, California 90012

Dear Mr. Bellomo:

On August 26, 1986, EPA and Whittaker Corporation signed a Consent Agreement and Final Order (the "Order"). As required by condition V.A. and C. of the Order, Whittaker submitted the closure plan, the soil characterization plan, and the analytical results from soil sampling conducted in June 1986. EPA transmitted copies of these documents to your office in August and September. The purpose of this letter is to request the State's comments on the submittals.

Currently, the status of the land disposal facility closure remains unresolved. The soil characterization plan was conceived to allow the facility the opportunity to demonstrate that the previous closure of the surface impoundments in 1983 was in fact "clean closure." Under the Consent Agreement, while EPA will be approving the soil characterization plan, reviewing the analytical data, and providing an initial determination regarding "clean closure" of the surface impoundments, we need the State's input. Once the soil characterization plan is approved and a determination is made on "clean closure" of the surface impoundments, we can more accurately determine what should still be addressed in the closure plan. The "clean closure" determination could ultimately affect the scope of the closure plan, which has also been submitted to the State for review and action. The State has the lead on the review of the closure plan, and this land disposal facility closure requires due attention.

There is a need for the State's priorities to consider support for EPA's enforcement action. Until the facility is closed pursuant to the regulations, it will remain on the list of active land disposal facilities. The Department of Health will be required to develop a Facility Management Plans (FMP). The schedule in the FMP should reflect the tasks at hand, i.e. in December 1986, a determination of the adequacy of the soil

characterization plan and an interpretation of the submitted analytical data, and shortly thereafter in FY 87, review of the closure plan.

Consistent with the Consent Agreement, Whittaker Corporation is committed to proceeding with closure of its facility as soon as possible. We understand that Whittaker Corporation has a contractual agreement to vacate the premises by the end of the year, and as such, is moving quickly to implement the closure plan. Based on this contractual agreement, should Whittaker Corporation be unable to vacate the premises on time, it will be subject to penalties. While compliance with the regulations and implementation of the closure plan is our primary concern, we are cognizant of Whittaker Corporation's constraints and its good faith efforts to comply with the regulations.

We would appreciate by December 8, 1986 your comments on the soil characterization plan and analytical results. Questions on this matter should be directed to Lily Wong at (415) 974-7517.

Sincerely,

Phil Bobel, Chief
Waste Programs Branch
Toxics and Waste Management Division

cc: Paul Blais, DHS - HQ
Caroline Cabias, DHS - HQ
Bob Ghirelli, RWQCB - LA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

12 DEC 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

WHITTAKER CORP-BERMITE DIVISION
22116 WEST SOLEDAD CANYON ROAD
SAUGUS, CA 91350
RE: CAD064573108

Dear Hazardous Waste Facility Owner/Operator:

As you are aware, the Hazardous and Solid Waste Ammendments of 1984 (HSWA) (Public Law 98-616) included a provision which affected the regulatory status of all Interim Status Land Disposal Facilities. Section 213 of HSWA required all Interim Status Land Disposal Facilities to submit on or before November 8, 1985: 1) a statement certifying compliance with all applicable RCRA Ground Water, 2) a statement certifying compliance with all applicable RCRA financial requirements, and 2) a Part B permit application. Failure to comply with these requirements would result in the loss of interim status.

On November 8, 1985 your facility lost interim status for all affected land disposal units for the following reason(s):

- [✓] You failed to submit a statement certifying compliance with all applicable RCRA Ground Water requirements.
- [✓] You failed to submit a statement certifying compliance with all applicable RCRA financial requirements.
- [✓] You failed to submit a Part B permit application

If you have not already done so, you must immediately cease to place waste in any affected land disposal unit.

If you have any questions regarding this matter, please contact Judy Walker of my staff at (415) 974-8015.

Sincerely,

Harry Seraydarian
Director
Toxics and Waste Management Division

UNITED STATES GOVERNMENT

2-Way Memo

12/12/85

Subject: RCRA Investigation
Report No. R(85)E217

To : Phil Bobel, ~~Chief~~ PDB 1/13
RCRA ~~Programs~~ Branch

Lily:
Take your time reading this one. Let's discuss when you have initial questions formulated
Carl

INSTRUCTIONS

Use routing symbols whenever possible.

SENDER (*Originator of message*):
Use brief, informal language.
Conserve space.
Forward original and one copy.

RECEIVER (*Replier to message*):
Reply below the message, keep one copy, return one copy.

DATE OF MESSAGE	ROUTING SYMBOL
11/12/85	T-2

SIGNATURE OF ORIGINATOR: Barry Cofer BCofer

TITLE OF ORIGINATOR: Field Investigator

FOLD — MESSAGE — FOLD

Enclosed is an inspection report for Whittaker/Bermite's Saugus facility. This report includes a Revised PART A Application. The Part A reflecting current activities, and many of the required records were not produced at the time of inspection but were prepared and transmitted over time, extended at facility request. The 271.71 and 271.72 violations listed have been corrected.

Typo? Shouldn't it be 270.71 and 270.72

Potential Violations:

270.71a.2	265.15b.1-4	265.52d	262.21a.4	265.90a	265.115
270.72c	265.15d	262.43	265.52f	265.73b.1-3	265.112a
265.13a.2-3	265.16d	265.37a.3	262.20b	265.7a	265.112a.1-4
265.142b	265.174	262.228a-c	265.142d	265.194a.1-2,4-5	

REPLY

DATE OF REPLY	ROUTING SYMBOL

SIGNATURE OF REPLIER

TITLE OF REPLIER

From : Barry Cofer, Field Inspections Section (T-3-2) BCS

Thru: Kathleen Shimmin, Chief, Field Operations Branch (T-3) 12/4/85

1. RETAINED BY ADDRESSEE

5027-107

OPTIONAL FORM 27 (Rev. 7-81)
GSA FPMR (41 CFR) 101-11.6
NSN 7540-00-082-2447

ROUTING AND TRANSMITTAL SLIP

Date 5/10

TO: (Name, office symbol, room number, building, Agency/Post)	Initials	Date
1. ~~Laura~~ Paul.		
2. Pt. A file		
3.		
4. CAD 064 573 108		
5.		

	Action		File		Note and Return
	Approval		For Clearance		Per Conversation
	As Requested		For Correction		Prepare Reply
	Circulate	X	For Your Information		See Me
	Comment		Investigate		Signature
	Coordination		Justify		

REMARKS

new facility didn't require permit since tanks are used for on-site storage less than 90 days. I concur with Shane that we don't need to inspect. Adequate closure of surface imp? If so, note & send to Part A file. If not, pls. indicate closure process mailing.

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)

Paul

Room No.—Bldg.

Phone No.

5041-102

OPTIONAL FORM 41 (Rev. 7-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.206

☆ GPO : 1982 O - 381-529 (221)

Blais

RECORD OF COMMUNICATION

☐ PHONE CALL ☐ DISCUSSION ☐ FIELD TRIP ☐ CONFERENCE
☐ OTHER (SPECIFY)

(Record of item checked above)

TO:	FROM:	DATE
Jim Zigg, Whittaker-Bermite, Saugus, California	Dan Shane T-3-2	11:00 AM
		TIME 5/3/84

SUBJECT
Closure of Surface Impoundments.

SUMMARY OF COMMUNICATION

Facility completed closure of surface impoundments in December 1983. A new tank storage facility was been constructed at the site. The tank facility is complete with concrete lab base and perimeter dike.

Mr. Zigg was not certain whether they had submitted to State the closure certification.

was new facility permitted by State and closure plan submitted. public hearing held, certification submitted?

CONCLUSIONS, ACTION TAKEN OR REQUIRED

1. I see no reason to inspect this facility at this time.

2. Blais may want to follow up on adequacy of closure.

INFORMATION COPIES TO: Mandel, Young, Blais, Wilson

EPA Form 1300-6 (7-72) REPLACES EPA HQ FORM 5300-3 WHICH MAY BE USED UNTIL SUPPLY IS EXHAUSTED.

RECORD OF COMMUNICATION	☒ PHONE CALL ☐ DISCUSSION ☐ FIELD TRIP ☐ CONFERENCE ☐ OTHER (SPECIFY) (Record of item checked above)	
TO: Jim Zoyd, WHITTAKER & BEMITE, SANGUS, California	FROM: DAN SHANE T-3-2	DATE 11:00 AM TIME 5/3/84

SUBJECT

Closure of Surface Impoundments.

SUMMARY OF COMMUNICATION

Facility completed closure of surface impoundments in December 1983. A new tank storage facility has been constructed at the site. The tank facility is complete with concrete slab base and perimeter dike.

Mr. Zoyd was not certain whether they had submitted to State the closure certification.

CONCLUSIONS, ACTION TAKEN OR REQUIRED

1. I see no reason to inspect this facility at this time

2. Blais may want to follow-up on adequacy of closure.

INFORMATION COPIES

TO: MANOEL, Yoshii, BLAIS, Wilson

EPA Form 1300-6 (7-72) REPLACES EPA HQ FORM 5300-3 WHICH MAY BE USED UNTIL SUPPLY IS EXHAUSTED.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Pt A

31 JAN 1983

Loyd R. Luce
Bermite Division
Whittaker Corporation
22116 West Soledad Canyon Road
Saugus, California 91350

Re: West Soledad Canyon Road Facility
(EPA I.D.# CAD064573108)

Dear Mr. Luce:

The Environmental Protection Agency (EPA) has received your request to change your facility's status from a permitted facility to that of a generator. Our review of the provided information indicates that the facility needs to comply with the Resource Conservation and Recovery Act (RCRA) permitting regulations. Burning waste propellant is considered thermal treatment under RCRA and requires a hazardous waste permit (see 40 CFR 265.370 and 265.382). For the preceding reason we will continue to consider your facility as requiring a permit and not change the facility's status to that of a generator. If you have any further questions please contact John Mullen of my staff at (415) 974-7843.

Sincerely yours,

William D. Wilson
Chief, Technical Assessment Section

cc: Nestor Acedera, Los Angeles DOHS

T-2-2:MULLEN:debbie:420B:1/28/83:1pg.

CONCURRENCES

SYMBOL	JM	T-2-2						
SURNAME	Mullen							
DATE	1/28	1/28/83						

EPA Form 1320-1 (12-70)

Shane

DEC 03 1982

Mr. Peter A. Rogers, Chief
Hazardous Waste Management Branch
California Department of Health Services
714 P Street
Sacramento, CA 95814

Dear Mr. Rogers:

On September 22, 1982, a hazardous waste investigation was conducted at Bermite Division, Whittaker Corporation, Saugus, CA (CAD064573108) by Randy Harcus and Daniel Shane of our Field Inspections Section. During the course of our investigation, information was gathered in accordance with Section 3007 of the Resource Conservation and Recovery Act (RCRA). A copy of our investigation report is enclosed with the Los Angeles regional office's copy of this letter for their review and compliance follow-up action.

The purpose of this letter is to provide notice, pursuant to Section 3008(a)(2) of RCRA, that EPA has found Whittaker Corporation to be in violation of various State requirements contained in the facility's Interim Status Department, and various Federal requirements contained in 40 CFR Part 265.

The following deficiencies were observed during the records review and facility inspection:

40 CFR 265.31 (ISD Section II.1.4) - Drums containing hazardous wastes are stored on the ground. There is no containment structure to retain spills or surface water runoff.

40 CFR 265.13 (ISD Section III.3) - A written Waste Analysis Plan has not been prepared.

40 CFR 265.90 (ISD Section VII) - There is no groundwater monitoring system.

40 CFR 265.16 (ISD Section III.6 (d)) - There are no written records of the type and amount of introductory and continuing personnel training.

40 CFR 265.52 (ISD Section III.13(e)) - The Contingency Plan does not list the emergency equipment available at the facility, along with its location and capabilities.

40 CFR 265.53 (I&D Section III.14(b)) - The Contingency Plan has not been submitted to the local Police Department, Fire Department and hospital.

Section II.E.2 of the Phase I Memorandum of Agreement (MOA) makes it the primary obligation of the State to take timely and appropriate action against persons in violation of facility standards. This section includes violations detected by Federal compliance evaluation inspections.

EPA believes it is appropriate that the State initiate enforcement action. As required by the RCRA grant, please provide us with a copy of your compliance action or documentation that compliance has been achieved within thirty (30) days of receipt of this letter, and all follow-up correspondence. Please report your compliance actions related to this case on your monthly inspection and compliance report. Should the State fail to take action within the specified time period, EPA would exercise its right to initiate enforcement action under Section 3008(a)(2) of RCRA.

If you have any questions or require additional information, please contact Paul D. Blais of my staff at (415) 974-8129.

Sincerely yours,

Phil Bobel
Chief, Toxics and Waste Programs Branch
Toxics and Waste Management Division

Enclosure

cc: John Hinton, DORS-LA (w/encl.)

bc: Blais, T-2-1
Mandel, T-3-2
Jones, ORC

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DEC 03 1982

Mr. Peter A. Rogers, Chief
Hazardous Waste Management Branch
California Department of Health Services
714 P Street
Sacramento, CA 95814

Dear Mr. Rogers:

On September 22, 1982, a hazardous waste investigation was conducted at Bermite Division, Whittaker Corporation, Saugus, CA (CAD064573108) by Randy Marcus and Daniel Shane of our Field Inspections Section. During the course of our investigation, information was gathered in accordance with Section 3007 of the Resource Conservation and Recovery Act (RCRA). A copy of our investigation report is enclosed with the Los Angeles regional office's copy of this letter for their review and compliance follow-up action.

The purpose of this letter is to provide notice, pursuant to Section 3008(a)(2) of RCRA, that EPA has found Whittaker Corporation to be in violation of various State requirements contained in the facility's Interim Status Department, and various Federal requirements contained in 40 CFR Part 265.

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40 CFR 265.31 (ISD Section II.1.4) - Drums containing hazardous wastes are stored on the ground. There is no containment structure to retain spills or surface water runoff.

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40 CFR 265.90 (ISD Section VII) - There is no groundwater monitoring system.

40 CFR 265.16 (ISD Section III.6 (d)) - There are no written records of the type and amount of introductory and continuing personnel training.

40 CFR 265.52 (ISD Section III.13(e)) - The Contingency Plan does not list the emergency equipment available at the facility, along with its location and capabilities.

CONCURRENCES

SYMBOL	T-2-1	ORC	[illegible] for	[illegible]				
SURNAME	Blain	Jones	T-2	[illegible]				
DATE	12/1/82	12/2/82	12/2/82	12/2				

EPA Form 1320-1 (12-70) OFFICIAL FILE COPY

40 CFR 265.53 (ISD Section III.14(b)) - The Contingency Plan has not been submitted to the local Police Department, Fire Department and hospital.

Section II.E.2 of the Phase I Memorandum of Agreement (MOA) makes it the primary obligation of the State to take timely and appropriate action against operators in violation of facility standards. This section includes violations detected by Federal compliance evaluation inspections.

EPA believes it is appropriate that the State initiate enforcement action. As required by the RCRA grant, please provide us with a copy of your compliance action or documentation that compliance has been achieved within thirty (30) days of receipt of this letter, and all follow-up correspondence. Please report your compliance actions related to this case on your monthly inspection and compliance report. Should the State fail to take action within the specified time period, EPA would exercise its right to initiate enforcement action under Section 3008(a)(2) of RCRA.

If you have any questions or require additional information, please contact Paul D. Blais of my staff at (415) 974-8129.

Sincerely yours,

Phil Bobel
Chief, Toxics and Waste Programs Branch
Toxics and Waste Management Division

Enclosure

cc: John Hinton, DOHS-LA (w/encl.)

bc: Blais, T-2-1
Mandel, T-3-2
Jones, ORC

Diana - T-2 - Blais - 980C
Curt - 11/30/82

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

NOV 1 1982

File Number TSC 14-1(82)-98
Facility EPA ID#: CAD064573108

Mr. Zoyd R. Luce, Director
Industrial Relations Dept.
Bermite Division
Whittaker Corporation
22116 West Soledad Canyon Road
Saugus, CA 91350

Dear Mr. Luce:

On September 22, 1982, a hazardous waste investigation was conducted at Bermite Division, Whittaker Corporation, Saugus, CA, in accordance with Section 3007 of the Resource Conservation and Recovery Act (RCRA). A copy of the investigation report is enclosed. The deficiencies that are noted in the report are not necessarily inclusive and any omission to cite other deficiencies is not intended to nor shall be binding upon the Agency. You may provide comments in writing regarding any aspect of the report. In all correspondence, please refer to the File Number of this letter.

EPA routinely provides copies of investigation reports to State agencies. Such releases will be handled according to the basic rules governing business confidentiality claims contained in the Code of Federal Regulations (40 CFR Part 2). Any claim of confidentiality should be made within fifteen (15) working days from the receipt of this letter. EPA will construe a failure to furnish timely comments as a waiver of the confidentiality claim.

If you have any questions concerning the report, please contact Randy Marcus, Field Investigator, at (415)974-8361.

Sincerely yours,

Philip Bobel
Chief, Toxics and Waste
Programs Branch

Enclosure
SOW-~~[illegible]~~ ENF

CONCURRENCES

SYMBOL	cc: John Hinton, DOHS, Los Angeles, CA		T-2-1	T-2-1				
SURNAME	bc: T-3-2		Blais	[illegible]				
DATE	T-2-2		11/1/82	11/1/82				

EPA Form 1320-1 (12-70) T-3-2 Marcus/Blais:June,In26-2p-tox15:8361:10/27/82

State of California

Department of Toxic Substances Control

Memorandum

To : File

Date: April 30, 1993

From : Alan Sorsher
(818) 551-2892 A.S.

Subject: CLOSURE OVERSIGHT REPORT #13 FOR WHITTAKER CORP., BERMITE DIVISION, EPA ID #CAD 064573108

Enclosed is the Closure Oversight report for Whittaker Corporation, Bermite Division, located in Santa Clarita, California. The report covers the status of closure-related activities for the facility beginning January 1, 1993 and ending March 31, 1993.

enclosure

cc: Ms. Lily Hershkovitz
U.S. EPA, Region IX
75 Hawthorne Street
San Francisco, California 94105

Ms. Nancy Long
Cal/EPA
555 Capitol Mall
Suite 235
Sacramento, California 95814

Mr. Steve Koyasako
Office of Legal Counsel and Criminal Investigations
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

Mr. Donald Williams
Senior Planner
City of Santa Clarita
23920 Valencia Blvd. Suite 300
Santa Clarita, CA 91355

STATUS REPORT #13

CLOSURE OVERSIGHT
for

WHITTAKER CORPORATION, BERMITE DIVISION
22116 West Soledad Canyon Road, Santa Clarita, California
EPA ID NUMBER CAD 064573108

January 1, 1993 through March 31, 1993

Prepared by:

California Environmental Protection Agency
Department of Toxic Substances Control
Region 3 - Glendale

March 1993

CLOSURE OVERSIGHT STATUS REPORT #13

WHITTAKER CORPORATION, BERMITE DIVISION, SANTA CLARITA, CALIFORNIA
EPA ID NUMBER CAD 064 573 108

April 30, 1993

A. Introduction

This status report for the closure of the Whittaker-Bermite facility identifies the closure activities conducted, submittals by the facility and decisions made between January 1, 1993 and March 31, 1993. Facility background information was furnished in the initial closure Oversight Report dated July 1989.

In late 1989 and early 1990, U.S.EPA and DTSC (at that time DHS) acknowledged certifications of clean closure for 6 portable storage units, 2 stationary storage units, and the lead azide wash-water treatment unit. In February 1992, DTSC acknowledged clean closure of two open burning/open detonation (OB/OD) units. On July 22, 1992 DTSC acknowledged clean closure of this remaining OB/OD unit. Of the original 14 RCRA-regulated units, only the areas of the 2 former surface impoundments remain in the closure process.

B. General Developments

Groundwater monitoring and soil vapor extraction continues at the 317 surface impoundment area. Groundwater monitoring also is continuing at the 342 impoundment area.

As reported in Closure Oversight Report #7, the Anden Group, in partnership with Whittaker is planning for residential and commercial development of the property. As lead agency under the California Environmental Quality Act, the City of Santa Clarita has begun preparation of a Draft Environmental Impact Report (DEIR) for a plan which would include development of this property. The DEIR was expected to be issued for our review in March 1993, but has been postponed at least until July 1993.

C. Submittals Received from the Facility

1. Monthly status report for closure activities performed during December, 1992, dated January 8, 1993.

2. Area 342 RCRA Ground Water Quality Monitoring Report, October - December, 1992, dated January 14, 1993.

3. Seventeenth Quarterly Ground Water Sampling Report for 317 Surface Impoundment Area, dated January 14, 1993.

4. Letter from Whittaker's consultant, Acton, Mickelson, van Dam, Inc. (AMV), dated January 19, 1993, regarding "Trash Area North of Test Range Road."

5. Monthly Status Report for closure activities performed during January, dated February 9, 1993.

6. Letter report from AMV, "Excavation, Sampling, and Disposal of Materials from Miscellaneous Burn Area Solid Waste Management Unit," dated February 16, 1993.

7. Letter from AMV dated March 2, 1993, requesting to discontinue groundwater monitoring at the 342 Surface Impoundment Area.

8. Letter from AMV, dated March 2, 1993, regarding "Trash Exposed North of Test Range Road."

9. Monthly Status Report for closure activities performed during February 1993, dated March 11, 1993.

10. Letter from AMV, dated March 17, 1993, regarding implementation of Revised Water Quality Monitoring and Response Plans for the 317 and 342 Surface Impoundment Areas.

11. Area 342 RCRA Ground Water Quality Monitoring Report, January - March, 1993, dated April 9, 1993.

D. Groundwater and Soil Cleanup/Monitoring at Surface Impoundment Areas

1. 342 Impoundment Area:

As discussed in the previous report, comparison between up and down-gradient wells implies contamination by inorganic salts. The facility insists that this is due to off-site oil field disposal activities.

On December 14, 1992, the facility submitted a demonstration that the contamination is from a source other than the regulated unit. A meeting was held between DTSC and AMV on April 13, 1993 to discuss this demonstration. As a result of this meeting, DTSC is leaning toward acceptance of this explanation, which would result in clean closure of this unit.

2. 317 Surface Impoundment Area:

Monitoring well #10, the replacement for well #4, continues to test clean for TCE contamination. Whittaker's modified groundwater monitoring program to comply with the California Interim Status groundwater monitoring regulations has been sent to DTSC headquarters for review.

Whittaker continues to test soil vapor probes and operate vapor extraction wells to characterize and remediate soil contamination at this unit.

In late 1992, AMV submitted an assessment of the soil vapor monitoring system and a workplan for additional probes and extraction wells. DTSC plans to respond to this in the near future.

E. MISCELLANEOUS SOLID WASTE MANAGEMENT UNITS

As reported previously, rains during the Spring of 1992 eroded soil and revealed two areas of trash or waste on the property.

One area, originally labelled as "Trash Area North of Test Range Road," appears to be part of the East Fork Landfill. AMV's letters of January 19, and March 2, 1993 discuss recent developments including the finding in early March of an intact Mark IV signal cartridge which apparently washed out from the East Fork Landfill. The device is used to generate smoke when dropped in a practice bomb, and contains small amounts of phosphorus and gun powder. Whittaker plans to dispose of the cartridge as hazardous waste.

The second area, originally called the "Miscellaneous Burn Area Solid Waste Management Unit, is reported on in AMV's letter report dated February 16, 1993. This unit is located in the same narrow valley as the clean-closed RCRA Burn Cage, Pans and Rails unit and the clean-closed RCRA Burn Pits unit. This new unit, located in the north west corner of the valley, the North West Burn Area, appears to be distinct from the RCRA units. Material from this new unit failed the California Soluble Threshold Concentration Limit test for lead and copper. 37 truckloads of contaminated soil, (approximately 500 tons) were excavated and disposed at the Kettleman Hills hazardous waste landfill.

STATE OF CALIFORNIA — ENVIRONMENTAL PROTECTION AGENCY

PETE WILSON, *Governor*

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2
700 HEINZ AVE., SUITE 200
BERKELEY, CA 94710-2737

March 31, 1993

Mr. James H. Hart
Whittaker Ordnance
2751 San Juan Road
Hollister, California 95023

Dear Mr. Hart:

PROGRESS REPORT DATED FEBRUARY 24, 1993

We have reviewed the progress report and considered its conclusions and suggestions. Following are our comments regarding the report.

The samples taken and analyzed during July, 1992 have shown VOC contamination between 4.5 to 30 feet below grade. The recent samples were taken from 30 to 40 feet below grade. We do not believe the recent sampling results support your conclusion that there is no VOC contamination at the site. The recent samples show only that there is no VOC contamination below thirty feet at locations at which those recent samples were collected. If you believe that previous samples were contaminated in the sampling/analysis procedure then the soil at these depths must be resampled.

Upon request of your consultants we have drawn up the following sampling scheme for your site:

- Two soil borings in the former trench burn area near SB-10 and SB-13 shall be advanced to depth of 25 feet. Samples shall be taken at five feet intervals. Samples collected from near SB-10 shall be analyzed for benzene, dichlorodifluoromethane, 1,1,1-trichloroethane (TCA), acetone and toluene. Samples collected from soil boring near SB-13 shall be analyzed for acetone and toluene.

- A soil boring shall be advanced near SB-15 to depth of 25 feet and samples shall be at five feet intervals. Samples shall be analyzed for acetone and toluene.

- One sample shall be taken near SB-9 at five feet depth and be analyzed for dichlorodifluoromethane and toluene.

- One soil boring shall be advanced near SB-14 to depth of 30 feet and samples be taken every 5 feet. Samples shall be analyzed for acetone and toluene.

Printed on Recycled Paper

If you have any questions regarding this letter, please contact Mohammad Abri at (510) 540-3944.

Sincerely,

Dan F. Murphy
Unit Chief
Facility Permitting Unit

cc: Ms. Wendi Shafir
U.S. EPA, Region IX
75 Hawthorne Street
San Francisco, California 94105

Mr. John Mc Carroll
U.S. EPA, Region IX
75 Hawthorne Street
San Francisco, California 94105

Mr. Dale A. Van Dam
Acton. Mickelson. Van Dam, INC.
5090 Robert J. Mathews Parkway, #4
El Dorado Hills, California 95762

Mr. Richard Brown
Regional Water Quality Cotrol Board
81 Higuera Street, Suite 200
San Luis Obispo, California 93401-5427

STATE OF CALIFORNIA — CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY PETE WILSON, *Governor*

DEPARTMENT OF TOXIC SUBSTANCES CONTROL
1405 N. SAN FERNANDO BLVD., SUITE 300
BURBANK, CA 91504
(818) 567-3000

September 10, 1992

Ms. Barbara J. Mickelson, P.E.
Acton, Mickelson, van Dam, Inc.,
5090 Robert J. Mathews Parkway, #4
El Dorado Hills, CA 95762

Dear Ms. Mickelson:

REQUEST FOR EXTENSION OF TIME FOR SUBMITTAL OF DELIVERABLES, WHITTAKER CORP., BERMITE DIVISION, SANTA CLARITA, CA
EPA ID No. CAD 064573108

The Department of Toxic Substances Control (DTSC) has received a letter dated August 25, 1992 from Mr. Ronald Hausmann, requesting an extension of time for submittal of deliverables required under §8.1.1 of the recent Whittaker stipulation and order.

Since certain documents were not available to you until recently, the Department hereby grants the request to extend the due date for the above deliverables to September 14, 1992.

If you have questions, please contact Mr. Alan Sorsher at (818) 567-3119.

Sincerely,

Allan Plaza
for Jose Kou, Chief
Facility Management Branch

cc: Mr. Glen Abdun Nur
Bermite Division
22116 W. Soledad Canyon Road
Santa Clarita, CA 91350

Mr. Ronald Hausmann
Munger, Tolles & Olson
33 New Montgomery Street, Nineteenth Floor
San Francisco, CA 94105-9781

Mr. Donald M. Williams, Senior Planner
City of Santa Clarita
23920 Valencia Blvd. Suite 300
Santa Clarita, CA 91355

Mr. Tom Kelly
U.S. EPA, Region IX
1235 Mission Street
San Francisco, CA 94103

Mr. Steve Koyasako
Office of Legal Counsel
Department of Toxic Substances Control
P.O. Box 806
Sacramento, CA 95812-0806

STATE OF CALIFORNIA — HEALTH AND WELFARE AGENCY

PETE WILSON, *Governor*

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL PROGRAM (REGION 3)
1405 N. SAN FERNANDO BOULEVARD, SUITE 300
BURBANK, CA 91504
(818) 567-3000

Certified Mail

June 28, 1991

Mr. Glen AbdunNur
Site Manager
Whittaker Corporation, Bermite Division
22116 West Soledad Canyon Road
Saugus, CA 91350

Dear Mr. AbdunNur:

REPORT OF VIOLATION AND SCHEDULE OF COMPLIANCE

On April 26, 1991, Larry Stuck and Javier Hinojosa of the Department of Health Services (DHS) conducted an inspection of Whittaker Corporation, Bermite Division (WBD).

As a result of the inspection, violations of the hazardous waste statutes and regulations were identified.

Specific violations and required corrective actions are listed below. Failure to correct the identified violations within the schedule provided will result in DHS citing WBD for continuing/additional violations.

I. Schedule of Violations

Count 1: Title 22, California Code of Regulations (Cal. Code Regs.), section 67140 (a).

WBD failed to update its contingency plan to include the vapor extracting unit.

ount 2: Title 22, Cal. Code Regs. section 61704 (b).

WBD failed to develop and follow a written inspection schedule for inspecting monitoring equipment, safety and emergency equipment, and security devices.

Count 3: Title 22, Cal. Code Regs. section 67102 (a)(1).

WBD's waste analysis plan is incomplete as it does not include testing parameters for wastes entering and leaving the vapor extracting unit.

Count 4: Title 22, Cal. Code Regs., section 67105 (c).

WBD personnel failed to take part in annual reviews of the initial training requirements.

II. Schedule for Compliance

Correct violations upon receipt of this Report.

Please submit a written certification, which contains the language in Title 22, California Code of Regulations, section 66373 (d) to this office by July 28, 1991, that the violations have been corrected.

The Department will conduct a reinspection of WBD to verify compliance.

The issuance of this Report of Violation and Schedule for Compliance does not preclude DHS from taking administrative, civil, or criminal action as a result of the violations noted herein.

If you have any questions regarding this Report, please contact Larry Stuck at (818) 567-3034.

Sincerely,

for:

Scott Simpson
Branch Chief
Facility Management Branch

Certified Mail
84726
(R R R)

cc: Mr. William Soo Hoo
Assistant Chief Counsel
Toxics Legal Office
Toxic Substances Control Program
714/744 "P" Street
P.O. Box 942732
Sacramento, CA 94234-7320

Ms. Mary Locke, Chief
Office of Local Enforcement
Toxic Substances Control Program
714/744 "P" Street
P.O. Box 942732
Sacramento, CA 94234-7320

cc: Mr. Don Johnson, Chief
Surveillance and Enforcement Branch
Toxic Substances Control Program
714/744 "P" Street
P.O. Box 942732
Sacramento, CA 94234-7320

Mr. Paul Blais, Chief
Hazardous Waste Management Branch
Toxic Substances Control Program
714/744 "P" Street
P.O. Box 942732
Sacramento, CA 94234-7320

Mr. Anastacio Medina, Chief
Hazardous Waste Control Program
Los Angeles County
Department of Health Services
2615 S. Grand Avenue, Room 607
Los Angeles, CA 90007

Ms. Theodora Berger
Assistant Attorney General
Environmental Law Section
Office of the Attorney General
3580 Wilshire Blvd., Suite 800
Los Angeles, California 90010

Mr. Robert Ghirelli
Executive Officer
Regional Water Quality Control Board
Los Angeles Region
101 Center Plaza Drive
Monterey Park, CA 91754-2156

Mr. Frank Laguna
Waste Compliance Branch
U. S. Environmental Protection Agency
Region IX
75 Hawthorne Street (T-2-4)
San Francisco, CA 94105

Mr. David Guthman
Deputy District Attorney
Environmental Crimes/OSHA Division
320 W. Temple Street, Room 340
Los Angeles, CA 90012

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL DIVISION (REGION 3)
1405 N. SAN FERNANDO BOULEVARD, SUITE 300
BURBANK, CA 91504
(818) 567-3000

TELECOPY TRANSMITTAL FORM

DATE: 3/14/91

TO: TOM KELLY

PHONE: 415-744-2067

FROM: ALAN SORSHER

PHONE: 818-567-3119

NUMBER OF PAGES (INCLUDING COVER): 3

INFORMATION: ____

CONFIDENTIAL: X

PLEASE COMMENT: ____

URGENT: X

PER YOUR REQUEST: X

COMMENTS:

(TELECOPY NUMBER 818-567-3129)

. Seeshee

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

RECEIVED
JUL 09 1987

16 JUL 1987

CERTIFIED MAIL NO.: P 000 579 199
RETURN RECEIPT REQUESTED

In Reply
Refer to: T-2-2

Whittaker Corporation-Bermite Division
Attn: Gordon Louttit
22116 West Soledad Canyon Road
Saugus, CA 91350

Re: EPA ID# CAD064573108 WHITTAKER CORPORATION-BERMITE DIVISION

Dear Mr. Louttit:

The signing of the Hazardous and Solid Waste Amendments of 1984 (HSWA) on November 8, 1984, broadly expanded the authority of the EPA to regulate management of hazardous wastes under the Resource Conservation and Recovery Act (RCRA). Under Section 206 of HSWA, interim status facilities must submit information regarding solid waste management units on the facility property.

Enclosed is a copy of "Information Regarding Potential Releases from Solid Waste Management Units" which describes the information required. This information must be submitted within 30 days. Please send two copies to EPA at the address above (Mail Code T-2-2) and two copies to Alan Sorsher, DHS-SCS, 107 South Broadway, Room 7011, Los Angeles, California 90012. Also enclosed is a copy of "Corrective Action" which describes how this information may be used.

All information submitted will be subject to public disclosure, to the extent provided by RCRA and the Freedom of Information Act, U.S.C. Section 552 and EPA's Business and Confidentiality Regulations, 40 C.F.R. Part 2 (in particular, 40 C.F.R. 2.305). To claim confidentiality, you must clearly indicate by marking "Confidential" the specific items of information to which the claim applies. You must also submit a written substantiation of such claims at the time of the filing. Information covered by a confidentiality claim and substantiation will be disclosed by EPA only to the extent and by means of procedures set forth in 40 C.F.R. Part 2. If no claim of confidentiality or no substantiation accompanies the information when it is submitted, EPA may make the information available to the public without further notice to you.

Note that this submittal must also contain the certification statement and fulfill the signatory requirements of 40 C.F.R. 270.11. Failure to submit the information by the specified due date may result in enforcement actions pursuant to Section 3008 of RCRA.

If you have any questions about this request, contact Michael Fernandez at (415) 974-7475.

Sincerely,

Davis Bernstein

for/ Jeff Zelikson
Acting Director
Toxics & Waste Management Division

Enclosures

cc: Allan Sorsher, DHS-SCS
Athar Khan, RWQCB

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

PETE WILSON, GOVERNOR

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL PROGRAM (REGION 3)
1405 N. SAN FERNANDO BOULEVARD, SUITE 300
BURBANK, CA 91504
(818) 567-3000

March 1, 1991

Mr. Edward R. Muller
Vice President
and Chief Administrative Officer
Whittaker Corporation
10880 Wilshire Boulevard
Los Angeles, CA 90024-4163

Dear Mr. Muller:

REPORT OF VIOLATIONS AND SCHEDULE FOR COMPLIANCE, BERMITE DIVISION, SANTA CLARITA, CA, EPA ID No. CAD 064573108

A review of our files on the subject facility indicates a violation of hazardous waste statutes and regulations.

The specific violations and required corrective actions are listed below. Failure to correct the identified violations within the schedule presented will result in the Department citing Whittaker Corporation, Bermite Division, for continuing/additional violations.

I. VIOLATIONS FOR OPERATION OF CATALYTIC VAPOR DESTRUCTION UNIT

COUNT 1: 40 CFR 270.72, 22 Cal Code Regs. 66389(b):

Whittaker Corporation, Bermite Division failed to submit a revised Part A application reflecting the adoption of the King Buck catalytic oxidizer for use at the 317 surface impoundment area.

A revised Part A application was submitted by Whittaker dated June 16, 1989 with revisions added on July 6, 1989. This interim status change authorized the use of granular activated carbon for removal of solvent vapors from the soil at the 317 area. Subsequently, Whittaker decided to use the King Buck oxidizer to destroy the vapors, but failed to modify the Part A to reflect this decision.

COUNT 2: 40 CFR 270.1(b), 22 Cal Code Regs. 66389(a)(2), California Health and Safety Code Section 25200.5(b)(2):

Whittaker Corporation, Bermite Division failed to revise their Part A and is subject to enforcement for operating the King Buck oxidizer unit without a permit since August 1990.

II. SCHEDULE FOR COMPLIANCE:

1. Counts 1 and 2 must be corrected within 7 days of receipt of this letter.

Please submit a written certification which contains the language in Title 22, California Code of Regulations section 66373(d), to this office within 60 days of receipt of this report, that schedule items 1 and 2 above have been complied with.

The Department will conduct a re-inspection of Whittaker Corporation, Bermite Division to verify compliance.

The issuance of this Report of Violation and Schedule for Compliance does not preclude the Department from taking administrative, civil or criminal action as a result of the violations noted herein.

If you have questions regarding this report, please contact Mr. Alan Sorsher at (818) 567-3119.

Sincerely,

Allan Plaza
for Scott Simpson, Chief
Facility Management Branch

CERTIFIED MAIL
RRR
848 567

cc: Mr. Glen AbdunNur
Bermite Division
22116 W. Soledad Canyon Road
Santa Clarita, CA 91350

Mr. Anastacio Medina
Los Angeles County Hazardous Waste Program
2615 S. Grand Ave., 6th Floor
Los Angeles, CA 90007

Mr. Andrew Hollbrook,
RWQCB, Los Angeles
101 Centre Plaza Drive
Monterey Park, CA 91754-2156

Mr. Gordon Louttit
Vice President
Whittaker Corporation
10880 Wilshire Boulevard
Los Angeles, California 90024

Mr. David W. Hogan, Assistant Planner
City of Santa Clarita
23920 Valencia Blvd. Suite 300
Santa Clarita, CA 91355

Mr. Tom Kelly
U.S. EPA, Region IX
1235 Mission Street
San Francisco, CA 94103

Mr. Steve Koyasako
Toxics Legal Office
Toxic Substances Control Program
714/744 P Street
P.O. Box 924732
Sacramento, CA 94234-7320

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

Pete Wilson, Governor

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL PROGRAM (REGION 3)
1405 N. SAN FERNANDO BOULEVARD, SUITE 300
BURBANK, CA 91504
(818) 567-3000

February 5, 1991

Mr. Edward R. Muller
Vice President and
Chief Administrative Officer
Whittaker Corporation
10880 Wilshire Boulevard
Los Angeles, CA 90024-4163

Dear Mr. Muller:

VAPOR PROBES AT 317 AREA, BERMITE DIVISION,
EPA ID No. CAD 064 573 108

We are in receipt of a letter from Delta Environmental Consultants dated January 29, 1991 informing the Department of Health Services (DHS) of planned installation of additional vapor probes beginning on February 4, 1991. This will be the second set of probes Whittaker has had installed recently.

DHS is concerned that the workplans for the 317 contamination area are not being implemented as previously agreed upon.

If you recall, a proposed workplan was submitted by Whittaker in late September, 1990. On October 26, 1990 DHS responded with review comments on the workplan. At a meeting held on November 19, 1990, which you attended, additional points were clarified and the workplan was resubmitted to DHS on November 26. By our letter to you dated December 10, 1990, (copy attached) the workplan was conditionally approved by DHS.

The approved workplan called for a period of monitoring the then-existing probes followed by the installation of deep probes for the purpose of determining the vertical extent of contamination.

DHS is disappointed that instead of following the approved program, which was developed at considerable effort and expense by all parties, Whittaker has now embarked upon a program of probe installation which seems more directed at determining the <u>lateral</u> extent of contamination first. In addition, we have received no information on these recently installed probes such as their location, depth, construction or vapor concentration readings. We also have not received any recent vapor concentration data from the previously installed probes.

We request that brief interim reports containing the above information be furnished to us and that similar reports be prepared in a timely manner in the future.

While DHS does not wish to discourage or delay the characterization of the site contamination, we do not feel comfortable with Whittaker performing extensive field work without prior approval of details from DHS. We want to make sure that all aspects of the work is done in a proper manner and the most information is obtained for the funds expended.

It is important that all proposed closure work be approved by DHS for two reasons:

- If the work is not done in accordance with the closure plan, approved workplans and the regulations, it may have to be re-done.

- If the work is not done in accordance with the closure plan, approved workplans and the regulations, it will delay our review of the results and closure certification approval.

Your new consultant, Delta, seems to have a good grasp of the regulatory requirements for closure and we anticipate that their continued leadership on this project will accelerate the closure process implementation.

If you have any questions, please contact Alan Sorsher at 818-567-3119.

Sincerely,

Scott Simpson

Scott Simpson, Chief
Facility Management Branch

enclosures

cc: Mr. Steve Koyasako
Office of Legal Services
Toxic Substances Control Program
714/744 P Street
P.O. Box 924732
Sacramento, CA 94234-7320

Mr. Glen AbdunNur
Bermite Division, Whittaker Corp.
22116 West Soledad Canyon Road
Santa Clarita, CA 91350

Mr. Anastacio Medina,
Los Angeles County Hazardous Waste Program
2615 S. Grand Ave., 6th Floor
Los Angeles, CA 90007

Mr. Andrew Hollbrook,
RWQCB, Los Angeles
101 Centre Plaza Drive
Monterey Park, CA 91754-2156

Mr. David W. Hogan, Assistant Planner
City of Santa Clarita
23920 Valencia Blvd. Suite 300
Santa Clarita, CA 91355

Mr. Tom Kelly
U.S. EPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105

Mr. Michael J. O'Brien
Project Manager
Delta Environmental Consultants
3330 Data Drive
Rancho Cordova, CA 95670

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

PETE WILSON, GOVERNOR

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL PROGRAM (REGION 3)
1405 N. SAN FERNANDO BOULEVARD, SUITE 300
BURBANK, CA 91504
(818) 567-3000

January 16, 1991

Mr. Edward R. Muller
Vice President and
Chief Administrative Officer
Whittaker Corporation
10880 Wilshire Boulevard
Los Angeles, CA 90024-4163

Dear Mr. Muller:

IN THE MATTER OF: Whittaker Corporation, Bermite Division, Santa Clarita, CA EPA ID No. CAD 064 573 108

Enclosed please find a Corrective Action Order and Complaint for Penalty and related documents concerning violations of Chapter 6.5 of the California Health and Safety Code and Title 22 of the California Code of Regulations.

As indicated in the enclosures, you have a right to a hearing. Whether or not you choose to pursue an appeal, you are encouraged to explore the possibility of settlement by contacting Steve Koyasako at the address listed below, telephone number (916) 322-6996.

Sincerely,

Dennis A. Dickerson
Regional Administrator

CERTIFIED MAIL
RRR 848445

enclosures

cc: Mr. Steve Koyasako
Office of Legal Services
Toxic Substances Control Program
713/744 P Street
P.O. Box 924732
Sacramento, CA 94234-7320

Mr. Glen Abdun Nur
Bermite Division, Whittaker Corp.
22116 West Soledad Canyon Road
Santa Clarita, CA 91350

Mr. Anastacio Medina,
Los Angeles County Hazardous Waste Program
2615 S. Grand Ave., 6th Floor
Los Angeles, CA 90007

Mr. Andrew Hollbrook,
RWQCB, Los Angeles
101 Centre Plaza Drive
Monterey Park, CA 91754-2156

Mr. David W. Hogan, Assistant Planner
City of Santa Clarita
23920 Valencia Blvd. Suite 300
Santa Clarita, CA 91355

Mr. Tom Kelly
U.S. EPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105

STATE OF CALIFORNIA
HEALTH AND WELFARE AGENCY
DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL PROGRAM

In the Matter of: Whittaker Corporation, Bermite Division 22116 Soledad Canyon Road Santa Clarita, CA 91350 EPA # CAD 064573108 Respondent.	Docket HWCA 90/91-031 CORRECTIVE ACTION ORDER AND COMPLAINT FOR PENALTY Health and Safety Code Sections 25187 and 25189.2

INTRODUCTION

1.1. Parties. The State Department of Health Services (Department) issues this Corrective Action Order and Complaint for Penalty (Order and Complaint) to Whittaker Corporation, Bermite Division, a Delaware corporation doing business in California (Respondent).

1.2. Site. Respondent generated, handled, treated, stored, and/or disposed of hazardous waste at the following site: 22116 Soledad Canyon Road, Santa Clarita, CA 91350. These activities took place at various locations throughout the site and are delineated on the attached map (Exhibit 1.)

1.3. Interim Status. The Department authorized Respondent to manage hazardous waste by Interim Status Document number CAD 064573108 issued on September 25, 1981 for hazardous waste treatment in tanks, open burning, storage units for dry hazardous

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wastes, and storage of liquid hazardous wastes in surface impoundments.

1.4. Jurisdiction. Section 25187 of the Health and Safety Code (HSC) authorizes the Department to issue an Order when the Department determines that any person has violated, is violating, or threatens to violate specified provisions of the Health and Safety Code or any permit, rule, regulation, standard, or requirement issued or adopted pursuant thereto. HSC section 25189.2 authorizes the Department to issue a Complaint and to impose a penalty on persons who commit specified acts, pursuant to the procedures set forth in HSC section 25189.3.

1.5. Exhibits. All exhibits attached to this Order and Complaint are incorporated herein by this reference.

DETERMINATION OF VIOLATIONS

2. The Department has determined that Respondent has violated, is violating, or threatens to violate HSC section 25189.2 and other specified provisions as follows:

2.1. Respondent violated 40 Code of Federal Regulations (CFR) section 265.91(a)(2) in that it failed to install at least three monitoring wells hydraulically downgradient (i.e., in the direction of decreasing static head) at the limit of the number 342 surface impoundment area. There is only one monitoring well (MW-2) in the required area, consequently not ensuring immediate

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detection of any statistically significant amount of hazardous waste or hazardous waste constituents that migrate from the 342 surface impoundment area.

2.2. Respondent violated 40 CFR section 265.93 in that it has not prepared an outline of a ground water quality assessment plan or a ground water quality assessment plan for the 342 impoundment area capable of determining (1) whether hazardous waste or hazardous waste constituents have entered the ground water;

(2) The rate and extent of migration of hazardous waste or hazardous waste constituents in the ground water; and (3) The concentrations of hazardous waste or hazardous waste constituents in the ground water at or beneath the 342 surface impoundment area.

2.3. Respondent violated 40 CFR section 265.93(d) in that it failed to submit notification of a possible release from the 342 surface impoundment within seven days of the date that they discovered the statistical increase of contaminants in the ground water.

2.4. Respondent has violated 40 CFR sections 265.228 and 265.113(b), and Title 22, California Code of Regulations, sections 67288 and 67213(b) in that it failed to remove or decontaminate all waste residues, and contaminated subsoils at the 317 surface impoundment area within the time specified in the approved closure plan.

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2.5. Respondent violated 40 CFR section 265.93(a)(d) in that it has prepared a ground water quality assessment program for the 317 impoundment area, but the program is inadequate since it is incapable of determining the rate and extent of migration of hazardous waste or hazardous waste constituents in the ground water.

2.6. Respondent violated Title 22, California Code of Regulations, section 67003, in that since November 1, 1989, Respondent has not had financial assurance for closure for the Facility.

2.7. Respondent violated Title 22, California Code of Regulations, section 67015, in that since November 1, 1989, Respondent has not had financial assurance for post-closure care for the Facility.

2.8. Respondent violated Title 22, California Code of Regulations, section 67027, in that since November 1, 1989, Respondent has not had financial liability coverage for sudden accidental occurrences for the above-named Facility.

2.9. Respondent violated Title 22, California Code of Regulations, section 67028, in that since November 1, 1989, Respondent has not had financial liability coverage for non-sudden accidental occurrences for the Facility.

SCHEDULE FOR COMPLIANCE

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3. Based on the foregoing DETERMINATION OF VIOLATIONS, IT IS HEREBY ORDERED THAT:

3.1.1. Within thirty (30) days of the effective date of this Order and Complaint, Respondent shall develop and submit a specific plan for ground water quality assessment at the 342 surface impoundment area, capable of meeting the requirements of 40 CFR sections 265.93(a) and 265.93(d)(3)-(5). The ground water quality assessment plan shall be capable of meeting the minimum requirement for a detection monitoring system described in 40 CFR section 265.91. A registered geologist or certified geotechnical engineering geologist registered in California shall certify that the plan is capable of meeting the above-mentioned regulatory requirements. At a minimum the plan shall include the following: (a) characterization of the uppermost aquifer beneath the entire 342 surface impoundment area; (b) provisions to define lithology supervised by a registered geologist in the State of California; (c) provisions for determining the horizontal and vertical gradients; (d) provisions for determining the hydraulic parameters (hydraulic conductivity, transmissivity, and storage coefficient) based on an appropriate aquifer test analysis. Testing shall include long-term (72-96 hour) aquifer testing; (e) a determination of the rate and extent of migration of the hazardous waste or hazardous waste constituents in the ground water; (f) a determination of the concentrations of the hazardous

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waste or hazardous waste constituents in the ground water; (g) the installation of a minimum of two (2) additional ground water monitoring wells downgradient from the 342 surface impoundment area; (h) an updated Sampling and Analysis Plan for assessment purposes; (i) a schedule of implementation.

Employing water level data from the existing well, MW-2, and, at a minimum, the two new wells, Respondent shall report the local hydraulic parameters including but not limited to ground water flow rate and submit a map showing the direction of ground water flow, and shall submit this information along with well logs and well construction data for the new wells. If the Department determines that the three wells (one existing and two new wells) are not in fact downgradient, an additional well or wells shall be installed so that there are a minimum of three downgradient wells at the 342 surface impoundment area.

All downgradient wells to be used as part of the ground water monitoring system shall be located and constructed in accordance with 40 CFR Part 265, Subpart F; and such wells shall be capable of meeting the requirements of 40 CFR Part 270 and 40 CFR Part 264, Subpart F.

All field work and report preparation shall be performed by or under the direction of a registered geologist or certified engineering geologist.

3.1.2. Within fifteen (15) days of the completion of well construction and development required in paragraphs 3.1.1,

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Respondent shall conduct a sampling event in accordance with the updated Sampling and Analysis Plan specified in paragraph 3.1.1. Thereafter, Respondent shall implement the Sampling and Analysis Plan every thirty (30) days for ninety (90) days. After ninety (90) days, Respondent shall implement the Sampling and Analysis Plan quarterly until a final closure certification is accepted by the Department or as directed in writing by the Department.

Respondent shall report the concentration or values of the 40 CFR Part 265, Appendix III parameters along with other parameters in the Sampling and Analysis Plan to the Department within 45 days after completing each analysis.

3.1.3 Within sixty (60) days of the effective date of this Order and Complaint Respondent shall submit a revised ground water quality assessment plan and implementation schedule for the 317 surface impoundment area. The plan shall be prepared by a registered geologist or certified engineering geologist and, at a minimum incorporate the following features:

a) Since monitoring wells MW-4, MW-5, and MW-6 have not defined the lateral and vertical extent of contamination at the 317 surface impoundment area, a sufficient number of additional wells shall be installed so as to determine the rate and extent of migration of hazardous waste or hazardous waste constituents in the ground water. The additional data together with data from the existing wells shall be delineated on a plume map.

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b) The lateral and vertical extent of Volatile Organic Chemicals (VOC) contamination in the vadose zone has not been determined. Additional soil vapor probes shall be installed until the entire plume of VOC contamination can be delineated. Respondent shall implement this ground water quality assessment plan within thirty (30) days of approval thereof by the Department.

3.1.4. Immediately upon the effective date of this Order and Complaint Respondent shall: (a) perform all ground water work consistent with the RCRA Groundwater Monitoring Technical Enforcement Guidance Document which is published by the United States Environmental Protection Agency, Document No. OSWER-9950.1, and (b) follow the schedules set forth in this Order and Complaint. All ground water work shall be submitted for review and approval to the Department (lead agency in this RCRA Closure).

3.1.5. At the completion of each ground water monitoring event, Respondent shall evaluate and submit to the Department the ground water surface elevations to determine whether the monitoring well location requirement of 40 CFR section 265.91(a) has continued to be satisfied. If the evaluation shows that the location requirement is no longer satisfied, Respondent shall modify the number, location, or depth of the monitoring wells to bring the ground water monitoring system into compliance with this requirement.

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3.1.6. The stratigraphy at the Bermite facility has not been adequately characterized. When additional monitoring wells are installed at both surface impoundment areas, Respondent shall collect continuous core and soil samples and together with existing data, shall delineate such cores and samples on geologic cross sections. These cores and samples shall be adequate in number to characterize the vadose zone and the aquifer. This data is crucial to placement of wells in a ground water monitoring system.

3.1.7. Within forty-five (45) days of the effective date of this Order and Complaint, Respondent shall provide documentation to the Department of financial assurance for closure and post-closure care, as required by Title 22, California Code of Regulations, sections 67003 and 67015.

3.1.8. Within ninety (90) days of the effective date of this Order and Complaint, Respondent shall provide documentation to the Department of liability coverage for sudden accidental occurrences in the amount of $1 million per occurrence per facility with $2 million annual aggregate and liability coverage for non-sudden accidental occurrences in the amount of $3 million per occurrence per facility with a $6 million annual aggregate, as required by Title 22, California Code of Regulations, sections 67027 and 67028.

3.2. Submittals. All submittals from a Respondent pursuant to this Order and Complaint shall be sent to:

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85 34769

Dennis Dickerson, Regional Administrator
Region 3 (Burbank)
Toxic Substances Control Program
Department of Health Services
1405 San Fernando Road, Suite 300
Burbank, CA 91504

All submittals from a Respondent pursuant to the financial responsibility violations identified in this Order and Complaint shall be sent to:

Chief, Hazardous Waste Management Branch
Toxic Substances Control Program
Department of Health Services
714/744 P Street
P.O. Box 942732
Sacramento, CA 94234-7320

3.3. Communications. All approvals and decisions of the Department made regarding submittals and notifications will be communicated to Respondent in writing by the Regional Administrator, Toxic Substances Control Program, Department of Health Services, or his/her designee. No informal advice, guidance, suggestions, or comments by the Department regarding reports, plans, specifications, schedules, or any other writings by Respondent shall be construed to relieve Respondent of the obligation to obtain such formal approvals as may be required.

3.4. Department Review and Approval. If the Department determines that any report, plan, schedule, or other document submitted for approval pursuant to this Order and Complaint fails to comply with the Order and Complaint or fails to protect public health or safety or the environment, the Department may:

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a. Modify the document as deemed necessary and approve the document as modified or

b. Return the document to Respondent with recommended changes and a date by which Respondent must submit to the Department a revised document incorporating the recommended changes.

3.5. Compliance with Applicable Laws: Respondent shall carry out this Order and Complaint in compliance with all local, State, and federal requirements, including but not limited to requirements to obtain permits and to assure worker safety.

3.6. Endangerment during Implementation: In the event that the Department determines that any circumstances or activity (whether or not pursued in compliance with this Order and Complaint) are creating an imminent or substantial endangerment to the health or welfare of people on the site or in the surrounding area or to the environment, the Department may order Respondent to stop further implementation of this Order and Complaint for such period of time as needed to abate the endangerment. Any deadline in this Order and Complaint directly affected by a Stop Work Order under this section shall be extended for the term of the Stop Work Order.

3.7. Liability: Nothing in this Order and Complaint shall constitute or be construed as a satisfaction or release from liability for any conditions or claims arising as a result of past, current, or future operations of Respondent.

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85 34769

Notwithstanding compliance with the terms of this Order and Complaint, Respondent may be required to take further actions as are necessary to protect public health or welfare or the environment.

3.8. Site Access: Access to the site shall be provided at all reasonable times to employees, contractors, and consultants of the Department, and any agency having jurisdiction. Nothing in this Order and Complaint is intended to limit in any way the right of entry or inspection that any agency may otherwise have by operation of any law. The Department and its authorized representatives shall have the authority to enter and move freely about all property at the Site at all reasonable times for purposes including but not limited to: inspecting records, operating logs, and contracts relating to the Site; reviewing the progress of Respondent in carrying out the terms of this Order and Complaint; and conducting such tests as the Department may deem necessary. Respondent shall permit such persons to inspect and copy all records, documents, and other writings, including all sampling and monitoring data, in any way pertaining to work undertaken pursuant to this Order and Complaint.

3.9. Sampling, Data, and Document Availability. Respondent shall permit the Department and its authorized representatives to inspect and copy all sampling, testing, monitoring, and other data generated by Respondent or on Respondent's behalf in any way pertaining to work undertaken pursuant to this Order and

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STD. 113 (REV. 8-72)

85 34769

Complaint. Respondent shall allow the Department and its authorized representatives to take duplicates of any samples collected by Respondent pursuant to this Order and Complaint. Respondent shall maintain a central depository of the data, reports, and other documents prepared pursuant to this Order and Complaint. All such data, reports, and other documents shall be preserved by Respondent for a minimum of six years after the conclusion of all activities under this Order and Complaint. If the Department requests that some or all of these documents be preserved for a longer period of time, Respondent shall either comply with that request, deliver the documents to the Department, or permit the Department to copy the documents prior to destruction. Respondent shall notify the Department in writing at least six months prior to destroying any documents prepared pursuant to this Order and Complaint.

3.10. Government Liabilities: The State of California shall not be liable for injuries or damages to persons or property resulting from acts or omissions by Respondent or related parties specified in paragraph 3.16 in carrying out activities pursuant to this Order and Complaint, nor shall the State of California be held as a party to any contract entered into by Respondent or its agents in carrying out activities pursuant to the Order and Complaint.

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85 34769

3.11. Additional Enforcement Actions: By issuance of this Order and Complaint, the Department does not waive the right to take further enforcement actions.

3.12. Incorporation of Plans and Reports. All plans, schedules, and reports that require Department approval and are submitted by Respondent pursuant to this Order and Complaint are incorporated in this Order and Complaint upon approval by the Department.

3.13. Extension Request: If Respondent is unable to perform any activity or submit any document within the time required under this Order and Complaint, Respondent may, prior to expiration of the time, request an extension of time in writing. The extension request shall include a justification for the delay.

3.14. Extension Approvals: If the Department determines that good cause exists for an extension, it will grant the request and specify in writing a new compliance schedule.

3.15. Penalties for Noncompliance: Failure to comply with the terms of this Order and Complaint may also subject Respondent to costs, penalties, and/or punitive damages for any costs incurred by the Department or other government agencies as a result of such failure, as provided by HSC section 25188 and other applicable provisions of law.

3.16. Parties Bound: This Order and Complaint shall apply to and be binding upon Respondent, and its officers, directors,

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85 34769

agents, employees, contractors, consultants, receivers, trustees, successors, and assignees, including but not limited to individuals, partners, and subsidiary and parent corporations, and upon any successor agency of the State of California that may have responsibility for and jurisdiction over the subject matter of this Order and Complaint.

PENALTY

4. Based on the foregoing DETERMINATION OF VIOLATIONS, the Department sets the amount of Respondent's total proposed penalty at $203,000.00.

RIGHT TO A HEARING

5. You may request a hearing to challenge the Order and Complaint. Appeal procedures are described in the attached Statement to Respondent.

EFFECTIVE DATE

6. This Order and Complaint is final and effective ten days from the date it is served on you, unless you request a hearing within the ten-day period.

TIME PERIODS

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7. "Days" for purposes of this Order and Complaint means calendar days.

Date of Issuance January 16, 1991.

Dennis Dickerson

Dennis A. Dickerson
Regional Administrator
Toxic Substances Control Program
Department of Health Services

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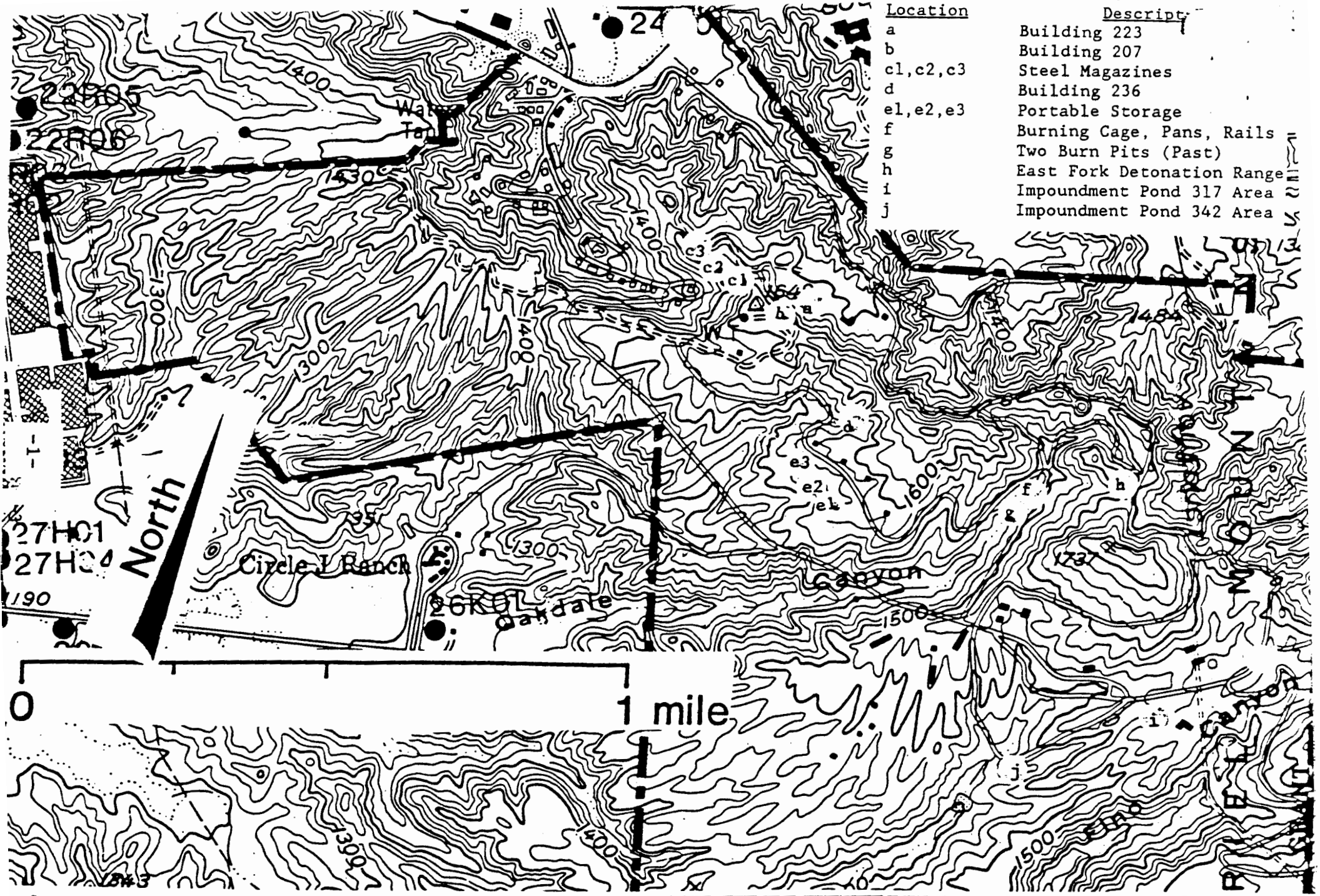

BERMITE DIVISION - WHITTAKER CORPORATION	Wenck Associates, Inc. Consulting Engineers Twelve Oaks Center 15500 Wayzata Blvd. Wayzata, MN 55391	EXHIBIT
LOCATION MAP OF RCRA UNITS		1

bcc: William Soo Hoo, Assistant Chief Counsel
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STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

GEORGE DEUKMEJIAN, GOVERNOR

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL PROGRAM (REGION 3)
1405 N. SAN FERNANDO BOULEVARD, SUITE 300
BURBANK, CA 91504
(818) 567-3000

December 10, 1990

Mr. Edward R. Muller
Vice President and
Chief Administrative Officer
Whittaker Corporation
10880 Wilshire Boulevard
Los Angeles, CA 90024-4163

Dear Mr. Muller:

REVISED WORKPLANS for WHITTAKER CORP, SANTA CLARITA FACILITY,
REVIEW OF GROUNDWATER RESPONSES TO REPORT OF VIOLATION,
EPA ID # CAD 064573108

On November 26, 1990, the Department of Health Services (DHS) received revised workplans from Delta Environmental Consultants for soil vapor monitoring and characterization at the 317 surface impoundment area, and plans for confirmation/investigation sampling the Old Lead Azide Sump Area, the building 110 sump/342 impoundment area, the ravine area south of the the 342 area, and the building 228 area.

After reviewing the plans and accompanying letter of explanation, we are approving the plans and details specified in the letter, subject to the following conditions:

Vapor Probe Monitoring and Installation at Area 317

3.1 Deep Vapor Probe Cluster

The location of proposed probe cluster P8 should be determined after additional current vapor readings are made.

Additional concentration readings from the existing probes (which were not furnished in the original workplan or during the November 19, 1990 meeting) were furnished in the revised workplan. After we were able to carefully study these readings, it appears that the proposed location of P8 near P2 and P3 may not be the area of highest concentration readings and a location closer to P5 may be more appropriate.

This also reinforces our original contention that ambiguities and uncertainties in determining the area of highest concentration at the current depth (elevation 1340) makes additional deep verification probes necessary.

In addition, the November 23, 1990 letter (page 4) references the closure plan's requirement for 3 probes within the excavation area. That part of the plan states, "After the excavation of the trench, 3 vapor probes will be driven into selected areas of the excavation <u>to verify that the extent of the volatile organics has been determined."</u> (emphasis added). Since the existing probe nests have not determined the extent of contamination within the excavation area, they have not met the closure plan requirement for 3 verification probes. Any reduction in the number of verification probes would constitute a major modification of the closure plan under RCRA and would a require a new public notice period.

Therefore, after the depth of contamination is determined for the area around probe cluster P8, two additional probes must be installed at other areas of high contamination to verify that the depth of contamination has been defined beneath the entire 317 area. It may be possible to include these probes as part of the program already proposed for defining the lateral extent of contamination as mentioned in the workplan.

6.0 Quality Control

This section in the original workplan focused on the Photovac unit. Since this unit will not be employed, the entire section was deleted from the revised workplan. However, documentation regarding QA/QC for the OVA unit must be recorded. At a minimum, this should include records of calibration, calibration gas used, warm-up periods and any field problems or unusual readings or behavior.

<u>Workplan for Confirmation/Investigation of Miscellaneous Solid Waste Management Units (SWMUs)</u>

If any of the SWMUs are confirmed to be sources of hazardous constituents, the study must be expanded to define the nature and extent of any release into the environment.

2.0 Sample Collection and Handling Procedures

The report mentioned in this section of the workplan must discuss the significance of concentrations of hazardous constituents found. Although the soil samples will be analyzed for Article 11 total metals, do not use TTLC or STLC as criteria of contamination or as cleanup levels.

Other SWMUs

Regarding the three landfill units, Hula Bowl I & II and the East Fork landfill, the previous investigation was undertaken on Whittaker's own initiative and was not ordered or approved by DHS or EPA. The previous investigation did not analyze for any individual hazardous constituents so as to determine whether or not these units have in the past or are currently releasing hazardous constituents to the environment.

These landfills were unlined, unregulated and uncontrolled. There is little information on what was discharged to them or their history. They were not disclosed by Whittaker during the visual site inspection conducted in July, 1987 by EPA contractors and DHS and RWQCB personnel.

We understand that Delta is gathering additional information on the excavation and sampling that was performed at these landfills during the spring of 1987. A determination of what additional sampling, if any, may have to be done at these SWMUs will be made after all available data has been reviewed.

ROV Groundwater Items

We have drafted our reply to Whittaker's responses related to groundwater and hydrogeology issues. We now expect to submit our reply to Whittaker by December 21, 1990.

If you have any questions, please contact Alan Sorsher at (818) 567-3119.

Sincerely,

Scott Simpson

Scott Simpson, Chief
Facility Management Branch

CERTIFIED MAIL
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cc: Mr. Glen AbdunNur
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STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY GEORGE DEUKMEJIAN, *Governor*

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL PROGRAM
REGION 3
1405 N. SAN FERNANDO BOULEVARD, SUITE 300
BURBANK, CA 91504

November 20, 1990

Mr. Tom Kelly
U.S. EPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105

Dear Mr. Kelly:

WHITTAKER CORPORATION, BERMITE DIVISION, SANTA CLARITA, CA
EPA ID No. CAD 064573108, RCRA FACILITY INVESTIGATION

This is confirm our recent telephone discussion regarding the RCRA Facility Investigation (RFI) for the above-referenced facility.

Five Miscellaneous Solid Waste Management Units (SWMUs) were identified as having the potential for past releases by DHS after reviewing the following documents:

1. Draft RCRA Facility Assessment Preliminary Review, A.T. Kearney, Inc. and Science Applications International Corp., June 22, 1987.

2. RCRA Facility Assessment, (including notes of visual site inspection performed July 16, 1987), A.T. Kearney, Inc. and Science Applications International Corp., September 16, 1987.

3. Response to EPA Information Needs Requested by Michael A. Fernandez, prepared by Wenck Associates, Inc., November 4, 1987.

4. Documentation Report, Solid Waste Management Units, Wenck Associates, Inc., August, 1988.

5. Memorandum from J. Peloquin, Corporate Industrial Hygienist, to Mr. Doug Moore, Bermite, August 26, 1982, Re: EPA/Health & Safety Survey of 8-17-82.

6. Letter from Larry N. Bohanan, Vice President, Finance, Bermite Division to Harry Sneh, DHS, November 20, 1985, Re: Request for Additional Information Regarding Closure of Surface Impoundments.

On July 31, 1990, DHS issued a Report of Violation (ROV) and Schedule for Compliance to Whittaker. In addition to addressing several items from the on-going closure activities, including follow-up to the CME, the ROV also required a workplan for the investigation of the following SWMUs:

1. The Old Lead Azide Building and Sump
2. The Transfer Sump for Building 342
3. The ravine above the phosphorus stabilizing area (disposal of discarded drums).
4. The Hula Bowl area (apparently used as a general disposal area and characterized as a "disaster area").
5. The paint storage area of building 228 (numerous spills).

SWMUs 3, 4, and 5 were not in the RFA Report but were mentioned in the 1982 internal memo, which was apparently missed by SAIC in the file review.

We understand that 1) you agree with the Department of Health Services (DHS) in considering the workplan for investigating the five SWMUs currently under development as the RFI workplan for this site and 2) approval of the RFI workplan will satisfy the RCRA Grant commitment for the December 1990 quarter. If this is not so, please contact me at (818) 567-3101.

Sincerely,

Allan Plaza

Allan Plaza
Unit Chief
Facility Management Branch

cc: Mr. Paul Blais
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CERTIFIED NO.
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STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY GEORGE DEUKMEJIAN, *Governor*

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL PROGRAM
REGION 3
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BURBANK, CA 91504

October 26, 1990

Mr. Glen Abdun Nur
Bermite Division, Whittaker Corp.
22116 West Soledad Canyon Road
Santa Clarita, CA 91350

Dear Mr. Simmons:

REVIEW OF REPORTS, WHITTAKER CORPORATION, BERMITE DIVISION, SANTA CLARITA, CA. EPA ID. #CAD064573108

The Department of Health Services (DHS) has reviewed the workplans dated September 27, 1990, as well as the September 14, 1990 response to the recent Report of Violations (ROV) submitted by Delta Environmental Consultants on Whittaker's behalf. Our comments are attached. Revised workplans reflecting the defiencies noted must be submitted by November 28, 1990.

Also enclosed are review comments on the Hydrogeological Assessment prepared by Wenck Associates in May, 1990.

If you or your consultant have any questions about what is required, please feel free to contact Alan Sorsher at (818) 567-3119. In addition, we can arrange for a meeting to discuss these issues.

Sincerely,

Allan Plaza

Allan G. Plaza
Senior Waste Management Engineer

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RRR
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enclosures

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COMMENTS ON WORKPLAN SUBMITTED SEPTEMBER 27, 1990

Soil Vapor Probe Plan at 317 Area:

The concepts expressed in this workplan are good. However, a number of details were vague or omitted.

1.1 BACKGROUND:

- Table 1 shows data only through 4/89. Data through 9/89 has been presented previously and must be considered as well. If any measurements have been taken since 9/89, they must be presented and considered in the workplan.

1.2 SCOPE OF WORK:

- The scope of work must include testing the influence of the vacuum extraction system on the formation, i.e. measure vacuum at various probes when the vents are under vacuum.

- The scope of work must include the possibility of installing additional extraction wells. See closure plan modification Rev. 4.1, page 4, items 1 - 4.

- The scope of work must be expanded to explain how the vapor probe monitoring will be carried out in conjunction with the operation of the vapor extraction system. The program must include periodic reporting of the amount of solvent removed and probe readings.

2.0 INITIAL VAPOR PROBE MONITORING:

- The workplan must specify the sampling frequency and monitoring program duration.

2.1 GENERAL SAMPLING METHODS:

- Soil vapor monitoring at the same time that the extraction system is operating may give erroneously low vapor concentration readings due to the dilution effect of clean air being drawn through the contaminated zone. However, vacuum readings at the probes may be useful in determining the influence of the vacuum at various depths and distances. This would be useful data if a more extensive extraction system is required.

- The qualifications and experience of the person operating the Photovac unit must be specified.

3.1 DEEP VAPOR PROBE CLUSTER:

- To confirm that the bottom of the contamination has been found, more than 1 deep probe cluster may be needed. The closure plan, (317 Work Plan for Soils Investigation and Removal at the 317 Area, October 9, 1987, Rev. 1.1, pages 2 - 3) calls for 3 probes at the bottom of the trench to verify the vertical extent of contamination. It also calls for at least 5 additional probes to investigate the surrounding area (lateral extent). Bermite's report "Soil Characterization at the 317 Area, Progress Report No. 2" proposed 6 verification probes.

- The choice of drilling technique must be carefully made and justified. Cable tool along with over-drilling the hole and loose casing may be preferable. This should also be able to support split spoon sampling. Telescoping casing is another possibility. Air rotary drilling may push the contamination deeper and/or sideways, and makes OVA readings during drilling operations questionable.

- The workplan does not specify how OVA readings will be taken during the drilling.

- The workplan does not state the criteria used to determine when to stop drilling or to install a probe.

- The boring must be logged by or under the direction of a registered geologist or certified engineering geologist.

- In order to support other hydrogeologic work, the boring(s) may be extended down to the aquiclude, with appropriate sampling.

3.2 PROBE CONSTRUCTION:

- The plan must anticipate construction of deeper probes than have been constructed in the past and alternate methods may be required for placement of sandpack, fine sand seal and bentonite seal. A bentonite grout may have to be pumped. Please clarify the borehole diameter in Fig. 6.

3.3 DEEP VAPOR PROBE MONITORING PROGRAM:

- The plan must specify how long the deep probe(s) will be monitored before determining the placement and depth of the additional probes.

3.4 ADDITIONAL VAPOR PROBE INSTALLATION:

- Bermite must recognize that the installation of additional vapor probes may be an iterative process, in order to define

the lateral extent of contamination and define the size and scope of the extraction well system.

Work Plan for Miscellaneous Releases: Count 14

1.0 INTRODUCTION AND SCOPE OF WORK:

1. Regarding the Old Lead Azide Building and Sump, the discussion in the response on this item has merely repeated information previously submitted, and has not addressed areas of concern:

   a. According to information gathered during the visual site inspection (7/16/87), the waste water sump used at the old lead azide building had concrete sides, but a dirt bottom. The sump was cleaned and backfilled and the soil sampled and tested for lead.

   b. Based on past performance, there may not have been adequate soil sampling and analysis at this area. For example, soil sampling at the 317 impoundment area in May 1983 found "no contamination." Four years later, extensive contamination was detected at the same area.

   Because of the above reasons, the ROV requested more details on the prior lead sampling. If it cannot be shown that adequate sampling and analysis was performed, then confirmation sampling must be done and properly documented.

2. Transfer Sump for Building 342:

   According to the submittal, "Response to Information Needs" prepared by Wenck Associates, November 4, 1987, page 22, describes the sump as "a small subsurface concrete basin." The current proposed workplan gives dimensions as 6'x3'x6'deep. Since high chloride concentrations would have attacked the concrete, and there is no indication of a chemically resistant liner in the sump, an additional soil sample from the area beneath the former sump must be tested as well.

   The proposed sample from the 342 area must be taken at a depth which will ensure that the native soil is sampled, not the subsequent backfilling.

3. Ravine Above the Phosphorus Stabilizing Area:

   There is no explanation of where on the 25'x50' area the three boring locations will be nor was there any rationale as to how they were chosen.

Judgmental soil samples must be taken at any areas showing evidence of contamination, (stains, stressed vegetation, etc.). The entire area must be checked for volatile organic chemicals (VOC) hotspots by using a grid system. Shallow (1-3 foot deep) holes must be punched with a rod or piece of pipe, and checked for vapors using a field instrument such as an OVA. Take core samples at any hotspots found, in addition to random locations. If no hotspots are found, then core samples must be taken at locations determined randomly using a random number generator or table of random numbers.

The samples must be extracted in a manner which yields total concentrations, and not only soluble portions.

4. Hula Bowl I and II:

DHS has indeed read the August 25, 1988 report which discusses these units. The "discussion" was very brief and in the form of a table. Two maps showing sampling grids were provided but no description of the sampling or analytical results were provided. Based on the fact that only sketchy information was provided along with the disturbing description of the area in the 1982 Bermite memo, DHS feels that a careful assessment of this area is certainly warranted. Sampling and analysis similar to that described for the above-mentioned ravine area must be done.

5. Paint Storage Area of Building 228:

Bermite contends that sampling is not warranted at the Building 228 area because "one paint spill (estimated to be much less than one gallon) can be seen on the asphalt surface."

The Bermite memo of 8/26/82 states in part, "4. The paint storage area of building 228 needs housekeeping. Numerous spills were noted on the driveway and curbing." Since there seems to have been sloppy housekeeping of paints, we feel that the area in question should be properly sampled, and this is what we asked for in count 14. Sampling and analysis similar to that described for the above-mentioned ravine area must be done.

2.0 Sample Collection and Handling Procedures:

As discussed in another document, the scope of sampling work must include the Old Lead Azide Area, the Building 228 Paint Storage Area, and the Hula Bowl Areas. Sampling plans similar to that discussed above must be developed and implemented.

The first paragraph mentions that analytical parameters will be specified in a subsequent paragraph, but they are not so specified.

2.1 Soil Sample Collection:

In addition to the headspace/PID analysis, soil vapors may be pumped into a Tedlar bag from a shallow punched hole, as discussed above.

4.0 Schedule:

Notify DHS at least one week before sampling.

Memorandum

To : Alan Sorsher
Associate Waste Management Engineer
Facility Management Branch

Date : October 25, 1990

Subject: CME Follow-up at Whittaker-Bermite

Via: Larry L. Peterson
Senior Engineering Geologist

From : Luis H. Ito
Engineering Geologist
Technical and Support Services Branch

Per your request of May 22, 1990, I have reviewed the report entitled "Hydrogeological Assessment [of the] 317 & 342 Areas" prepared by Wenck Associates, Inc., for the Whittaker Corporation, Bermite Division facility in Saugus, California. The following are my comments. For ease of reference, I have used the same headings found in the report.

I. **INTRODUCTION** (p. 1)

C. History of Facility Use

1. Bermite Facility

This section of the report presents a very brief description of the facility; however, very little "historical" information is presented concerning actual operation of the plant.

2. 317 and 342 Areas

a. Surface Impoundment History

This section of the report presents a very brief description of the operation and "closure" of both impoundments. The reader is told that when the impoundments were taken out of service, the liners were inspected and found to not have rips or tears. The report goes on to say that "Sampling of the soils beneath the [317] impoundment in 1983 did not detect soil contamination by organic solvents." I feel that this statement is both irrelevant and unsubstantiated. It is irrelevant because subsequent investigations did find soil contamination; it is unsubstantiated because the report does not discuss sampling techniques and the number/locations of samples, nor does it indicate where the soil samples were tested. If this statement is true, the consultant should have included (1) a table showing the analytical results, and (2) a reference to the report (by author and year) where this information can be found.

3. Past Geologic Investigations at the 317 and 342 Areas

This section of the report summarizes soil boring activities at both impoundments and the vapor probe nests at the 317 Area. On the basis of the information presented, it can be concluded that the stratigraphy under the 317 and 342 Areas has not been adequately characterized for the interval from approximately 100 feet below ground surface to the top of the saturated zone (i.e., the water table). On the other hand, the four cross-sections contained in Appendix B (i.e., Exhibits 3, 4, and 5), which are based on lithologic information obtained from 15 onsite borings, are very useful. In addition, these figures provide an adequate graphical representation of the near-surface contamination under the former surface impoundments because the results of chemical analyses and field HNU/OVA readings are plotted adjacent to the depth of where the sample was taken.

III. REGIONAL GEOLOGY (p. 14)

A. Introduction

The consultant has included cross-sections A-A' (Figure 8) and B-B' (Figure 9) prepared in 1988 by Richard C. Slade which show regional geologic structure in the vicinity of the Whittaker-Bermite facility. Because of the scale of these figures, the stratigraphy under the facility is not shown in detail. Moreover, only one of these cross-sections (B-B') crosses through the facility; unfortunately, it is not close enough to the 317 and 342 Areas to be of any value.

IV. GEOLOGY OF BERMITE FACILITY (p. 26)

B. Subsurface Geology

2. Subsurface Geology As Determined From Well Logs

This section of the report contains a detailed interpretation of the down-hole geophysical logs obtained at all six ground water monitoring wells. Although the cross-sections prepared with these logs (Figures 12, 13, and 14) are drawn at an adequate scale, the information presented has only limited value in defining subsurface stratigraphy. The stratigraphic interpretations are adequate for cross-section D-D', but cross-sections C-C' and E-E' require more data from additional borings or monitoring wells to close the gap of missing stratigraphy between boreholes.

VI. LOCAL HYDROGEOLOGY (p. 52)

A. Occurrence of Groundwater

1. Depth to First Encountered Groundwater at the 317 and 342 Areas

Cross-sections C-C', D-D', E-E', (Figures 18, 19, and 20) showing first encountered ground water and potentiometric elevations, as measured on 01/24/90, were adapted from Figures 12, 13, and 14. As a result, they suffer from the same data gaps.

SUMMARY

In my opinion, the findings presented in the June 25, 1990, Comprehensive Ground Water Monitoring Evaluation (CME) report by Jennifer S. Schroll are still valid (i.e., the present monitoring system is deficient in its ability to define the lateral and vertical extent of soil and ground water contamination at the 317 and 342 Areas.

I concur with the CME recommendation that new data should be obtained from continuous cores and/or soil samples and then used in conjunction with existing data to define the extent of contamination in the vadose zone. I also concur that additional soil vapor probe nests should be installed.

I recommend that all of the geophysical data be combined with borehole data into one cross-sectional interpretation (at a scale similar to the one used in Figures 18, 19, and 20); this would be of considerable value in defining the subsurface stratigraphy.

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

GEORGE DEUKMEJIAN, GOVERNOR

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL PROGRAM (REGION 3)
1405 N. SAN FERNANDO BOULEVARD, SUITE 300
BURBANK, CA 91504
(818) 567-3000

July 31, 1990

Mr. Glen Abdun Nur
Whittaker Corporation
Bermite Division
22116 W. Soledad Canyon Road
Santa Clarita, CA 91350

Dear Mr. Abdun Nur:

REPORT OF VIOLATIONS AND SCHEDULE FOR COMPLIANCE,
EPA ID No. CAD 064573108

On January 24, and 25, 1990, Jennifer S. Schroll, Alan Sorsher and Brian Lewis representing this Department, conducted a Comprehensive Groundwater Monitoring Evaluation (CME) of the Bermite facility in Santa Clarita, California.

As a result of that inspection and review of our files, violations of hazardous waste statutes and regulations were identified.

The specific violations and required corrective actions are listed below. Failure to correct the identified violations within the schedule presented will result in the Department citing Whittaker Corporation, Bermite Division, for continuing/additional violations.

I. VIOLATIONS FOR SURFACE IMPOUNDMENT UNITS:

COUNT 1: 40 CFR265.111, 22 Cal Code Regs. 67211:

Whittaker Corporation, Bermite Division failed to close the 317 surface impoundment in a manner that:
(a) Minimizes the need for further maintenance, and
(b) Controls, minimizes or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous constituents, hazardous waste decomposition products (volatile organic chemicals and/or semi-volatile organic chemicals) to the ground and groundwaters.

COUNT 2: 40 CFR265.228, 22 Cal Code Regs. 67288:

Whittaker Corporation, Bermite Division failed to remove or decontaminate all waste residues, and contaminated subsoils at the 317 surface impoundment area.

COUNT 3: 40 CFR265.113(b), 22 Cal Code Regs. 67213(b):

Whittaker Corporation, Bermite Division must complete final closure within 180 days after closure plan approval. An extension to the closure period may be approved if it is demonstrated that the closure activities will, of necessity, take longer than 180 days to complete. Whittaker Corporation, Bermite Division has failed to apply for an extension.

COUNT 4: 40 CFR265.91(a)(2):

Whittaker Corporation, Bermite Division failed to install at least three monitoring wells hydraulically downgradient (i.e., in the direction of decreasing static head) at the limit of the number 342 surface impoundment area. There is only one monitoring well (MW-2) in the required area, consequently not ensuring immediate detection of any statistically significant amount of hazardous waste or hazardous waste constituents that migrate from the 342 surface impoundment area.

COUNT 5: 40 CFR265.93(d):

Whittaker Corporation, Bermite Division failed to provide written notice to the EPA Regional Administrator within seven days of the date of such confirmation that groundwater quality may be affected by the 342 surface impoundment area.

Statistical analyses submitted by Whittaker's consultant on October 25, 1989 (Tables 3 and 5) show statistically significant differences, compared with upgradient wells, in two indicators of groundwater contamination. As of January 25, 1990, the required written notice had not been provided.

COUNT 6: 40 CFR265.93(a)(d):

Whittaker Corporation, Bermite Division has prepared a groundwater quality assessment program for the 317 impoundment area, but it is inadequate since it is incapable of determining the rate and extent of migration of hazardous waste or hazardous waste constituents in the groundwater.

COUNT 7: 40 CFR265.93:

Whittaker Corporation, Bermite Division has not prepared an outline of a groundwater quality assessment plan or a groundwater quality assessment plan for the 342 impoundment area capable of determining (1) whether hazardous waste or hazardous waste constituents have entered the groundwater; (2) The rate and extent of migration of hazardous waste or

hazardous waste constituents in the groundwater; and (3) The concentrations of hazardous waste or hazardous waste constituents in the groundwater at or beneath the 342 surface impoundment area.

COUNT 8: 40 CFR265.31 and CCR 67120:

Whittaker Corporation, Bermite Division failed to maintain and operate the 317 surface impoundment in a manner minimizing the possibility of any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to soil and/or groundwater at the 317 surface impoundment area which could threaten human health and the environment.

COUNT 9: 40 CFR265.228, 22 Cal Code Regs. 67288:

Whittaker Corporation, Bermite Division failed to properly evaluate and subsequently remove or decontaminate all waste residues, and contaminated subsoils at the 342 surface impoundment area.

In contrast to the statistical analysis for metals at the 317 impoundment, statistical analysis of metals at the 342 impoundment was performed by combining data from different horizons. Separate comparisons with the background area must be performed for shallow samples (1.5 - 2.0 feet) and for deeper samples (17.5 - 21.0 feet). An appropriate t' statistic must be calculated.

COUNT 10: 40 CFR265.111, 22 Cal Code Regs. 67211:

Whittaker Corporation, Bermite Division failed to close the 342 surface impoundment in a manner that:
(a) Minimizes the need for further maintenance, and
(b) Controls, minimizes or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous constituents, hazardous waste decomposition products.

COUNT 11: 40 CFR265.228, 22 Cal Code Regs. 67288:

The approved closure plan required sampling for Appendix VIII constituents at locations where prior sampling had found highest concentrations. The sampling report, "Verification Sampling Results at Selected RCRA Units, March 1988" failed to discuss how the Appendix VIII sampling locations were chosen in accordance with the approved closure plan.

COUNT 12: 40CFR 265.92(a):

Whittaker Corporation, Bermite Division failed to fully follow their groundwater sampling and analysis plan.

Water level measurements must be measured to the nearest 0.01 foot. During the inspection the last digit (.0X) was estimated by the consultant.

Total organic halogen analysis (TOX) detection limits are too high. The sampling and analysis plan references SW-846 and method 9020 for TOX, which sets the limit of detection at 5 ug/L. "Under conditions of duplicate analysis, the reliable limit of sensitivity is 5 ug/L." The detection limit used was 100 ug/L and no explanation was offered.

II. VIOLATIONS FOR BURN PIT AREA, BURN CAGE/PANS/RAILS AREA, & EAST FORK AREA

COUNT 13: 40CFR 265.111, 40CFR 265.381:

At closure, Whittaker Corporation, Bermite Division must

remove all hazardous waste and hazardous waste residues (including, but not limited to, ash) from the thermal treatment process or equipment.

1. As discussed in Count 9 above, data obtained by stratified random sampling should be evaluated by performing a statistical test on the various strata. For example, the data from the burn pit area might be analyzed by breaking it into two strata, 0 - 4.0 feet and 4.5 - 9.0 feet. Also, the study area may be divided vertically and the sub-areas compared with background. This should help in identifying possible hot spots which would not be obvious if all the data is averaged together. For example, the lead and cadmium at the East Fork Area seems to be limited to the top 2 feet.

2. For all tests where the number of samples in the study area and the background area differ, t′ must be calculated. The March 1988 report used a constant 1.7 for all tests.

3. Data from the October 1987 study may also be used if it was obtained from an appropriate depth.

4. The indicator parameter data in tables 10, 11 and 12 of the March 1988 "Verification Sampling Results" report must be used to support the other heavy metal data.

5. Since above items may impact the interpretation of the soil sampling results for the three RCRA burning units, the Health Risk Assessment will be modified if necessary and then reviewed.

6. The approved closure plan required sampling for Appendix VIII constituents at locations where prior sampling had found highest concentrations. The sampling report, "Verification Sampling Results at Selected RCRA Units, March 1988" must clearly discuss how the Appendix VIII sampling locations were chosen.

III. RELEASES FROM MISCELLANEOUS SOLID WASTE MANAGEMENT UNITS.

COUNT 14: California Health and Safety Code section 25187:

Whenever the department determines that there is or has been a release of hazardous waste or constituents into the environment from a hazardous waste facility, the department may issue an order specifying a schedule for compliance or correction. An order issued pursuant to this section shall include a requirement that the person take corrective action with respect to hazardous waste, including the cleanup of the hazardous waste, abatement of the effects thereof, and any

other necessary remedial action. "Hazardous waste facility" includes the entire site that is under control of an owner or operator engaged in the management of hazardous waste.

Our review of the files indicates that solid or hazardous wastes have been released from the following units:

1. Old Lead Azide Building and Sump:

   According to the "Response to Information Needs" dated 11/4/87, soil samples were taken in the sump area and drainage area during April 1986, and showed less than 0.05 mg/l of lead. More details on this sampling are required, such as, the number, location, depth and rationale for the sampling points chosen, along with a plot plan of the unit. Additional soil sampling may be required.

2. Transfer Sump for Building 342:

   This sump handled wash water from an operation which filled glass ampules of titanium tetrachloride. Titanium tetrachloride is toxic, reactive and corrosive and is an extremely hazardous waste in California. High chloride levels have been found in groundwater in the area where Building 342 existed. The location of the sump must be determined and soil samples tested for chloride.

3. Units mentioned in a Bermite company memo dated 8/26/82:

   a.) The ravine above the phosphorous stabilizing area was apparently used for disposal of discarded drums. This area must be identified and sampled for hazardous waste and hazardous waste constituents. Past disposal practices may have affected groundwater at the 342 area.

   b.) The Hula Bowl area was apparently used as a general dump and was characterized as "a disaster area." Apparently, the area received "illegal industrial and sanitary waste," as well as dirty oil filters and was used as an oil changing station. A number of oil spills were also mentioned. This area must be identified and a sampling plan developed and implemented.

   c.) Numerous spills were noted on the driveway and curbing at the paint storage area of building 228. This area must be identified and a sampling plan developed and implemented.

IV. SCHEDULE FOR COMPLIANCE:

1. Counts 3, 6, 7, 9, 11, 12 and 13 must be corrected within 45 days of receipt of this letter.

2. Within 60 days of receipt of this letter, submit a workplan and schedule for correcting the deficiencies noted in counts 1, 2, 4, 14, and any additional field work needed to implement plans for assessment, cleanup, or closure activities related to counts 6, 7, 9, 10, and 13. The schedule may be approved or modified and approved by the Department.

3. Unless an extension is granted in writing by the Department, all cleanup and closure work pursuant to this report shall be completed within 270 days from receipt of this letter. On-going groundwater monitoring will continue until the Department determines that it is no longer necessary.

Please submit a written certification which contains the language in Title 22, California Code of Regulations section 66373(d), to this office within 60 days of receipt of this report, that schedule items 1 and 2 above have been complied with.

The Department will conduct a re-inspection of Whittaker Corporation, Bermite Division to verify compliance.

The issuance of this Report of Violation and Schedule for Compliance does not preclude the Department from taking administrative, civil or criminal action as a result of the violations noted herein.

If you have questions regarding this report, please contact Mr. Luis Ito at (818) 567-3045 or Alan Sorsher at (818) 567-3119.

Sincerely,

Allan Plaza
for Scott Simpson, Chief
Facility Management Unit

CERTIFIED MAIL
RRR
P 725 390 179

cc: (see next page)

cc: Mr. Al Simmons
P.O. Box 708
Richardson, Texas 75080

Mr. Anastacio Medina
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1235 Mission Street
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Mr. Brian Lewis
Technical Services
Toxic Substances Control Program
713/744 P Street
P.O. Box 924732
Sacramento, CA 94234-7320

State of California

Department of Health Services

Memorandum

To : TOM KELLY - EPA
Whittaker-Bermite file
CAD 064573108

Date : April 5, 1990

Subject: Meeting Notes

From : Alan Sorsher

A meeting was held at DHS Region 3 to discuss our letter of 3/30/90 and Attachment 2 of that letter. A copy of the attendance list is attached.

Whittaker indicated they would prefer to "extend the Closure Plan or use a letter agreement rather than a consent agreement" since this would involve lawyers and may be time consuming.

The following notes refer to Attachment 2 of the letter.

1. Whittaker-Bermite indicated that they had no argument with item I.1.

2. A revised hydrogeological assessment based upon previous field work will be completed in about 3 weeks. Whittaker-Bermite proposed 2 deep borings after the assessment has been reviewed. This will be followed by additional probes.

3. One deep boring at the 342 area could possibly be completed as an up-gradient gwm well. One deep boring at 317 could possibly be completed as a vapor probe cluster.

4. Whittaker-Bermite agreed with items I. 2., I.3, and I.4.

5. Whittaker-Bermite agreed with item I.5. and will prepare a plan for pilot testing the vapor extraction system. Whittaker-Bermite will explain their belief that running the extraction system prior to completion of the characterization will not affect the accuracy of the characterization.

6. Whittaker-Bermite was in agreement with items II.1 - II.5.

7. Whittaker-Bermite questioned the necessity to install additional downgradient wells at the 342 area. DHS pointed out that they are required in the regulations and the one well at that unit is somewhat "side-gradient" and may be missing a potential plume.

8. Whittaker-Bermite proposed to install an up-gradient well at 342 before installing additional downgradient wells.

It was agreed that a plan for such a well be submitted to the agencies for approval before any work is done.

9. DHS recommended that a complete inorganic analysis be done for groundwater at the 342 area and that an ion balance be made.

10. Whittaker-Bermite will submit a notification to EPA and DHS of a possible release at 342 and include the up-gradient well as part of the groundwater assessment plan.

11. Whittaker-Bermite agreed with items III.4.a.-d. It was agreed that additional vapor probes should be installed before additional groundwater assessment wells at the 317 area.

12. Whittaker-Bermite agreed to provide the information and a workplan to comply with items IV.1. - 3.

Bermite April 5, 1990

Allan Sorsher	DHS	818-567-3118
Allan Plaza	DHS	(818) 567-3101
Andrew Holbrook	RWQCB	213 266 7614
Norm Wenck	Wenck Assoc.	612-479-4201
GLEN ABDUN-NUR	BERMITE	805-259-2241
AL SIMMONS	WHITTAKER	214-783-0533
Jennifer Schroll	DHS	818-567-3164
Larry Peterson	DHS	(818) 567-3172

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY GEORGE DEUKMEJIAN, GOVERNOR

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL PROGRAM (REGION 3)
1405 N. SAN FERNANDO BOULEVARD, SUITE 300
BURBANK, CA 91504
(818) 567-3000

March 30, 1990

Mr. Al Simmons
Whittaker Corporation
P.O. Box 708
Richardson, Texas 75080

Dear Mr. Simmons:

REVIEW OF REPORTS, WHITTAKER CORPORATION, BERMITE DIVISION, SANTA CLARITA, CA. EPA ID. #CAD064573108

The Department of Health Services (DHS) has reviewed the reports and correspondence listed on Attachment 1.

Attachment 2 is a listing of our comments and additional activities which we believe are necessary to bring the facility into compliance with State and Federal regulations pertaining to closure of hazardous waste management units, corrective action, and groundwater monitoring requirements. A revised cost estimate for the future work and an updated financial assurance mechanism will also be required to be submitted.

We plan to formalize these specific requirements and activities into a consent agreement with Whittaker Corporation in the near future.

My staff will be available to discuss these issues during your meeting scheduled for April 5, 1990.

Should you have questions, please contact Mr. Alan Sorsher at (818) 567-3119.

Sincerely,

Dennis Dickerson

Dennis A. Dickerson
Regional Administrator

enclosures

cc: Mr. Norman Wenck
Wenck Associates
832 Twelve Oaks Center
15500 Wayzata Blvd.
Wayzata, MN 55391

ATTACHMENT 2

I. SURFACE IMPOUNDMENT SOILS

1. Additional field work must be performed to fully determine the lateral and vertical extent of volatile organic chemicals (VOC) in the soil near the former 317 impoundment. Probes for confirming the lateral and vertical extent of VOC contamination must be installed.

a) The field instrumentation data obtained during the excavation of the various trenches indicate that the full extent of the horizontal contamination has not been defined.

- Characterization Report 2 (June 1988) shows significant OVA readings at the sides of the trenches: section 9 and 8 of trench C show 50 - 100 ppm at the sides of the trench at the 24-ft. depth. This is about 160 feet from the main hot spot and in the direction of well 4 which has detected VOC contamination.

- According to the February 1989 proposal, "Subsurface Vapor Probe Plan," OVA readings along the southern wall of trench D ranged from 0 to 900 ppm.

b) While vertical probes have indicated some strata of increased VOC contamination, the full vertical extent of the contamination has not been determined.

2. Semi-volatiles. We have examined the Health Risk Assessment for the 317 impoundment, especially for the semi-volatile constituents found. The document only lists the concentrations of the compounds found and catalogs the physical and toxicological properties of those compounds, but fails to provide any calculations to connect the concentrations found at the site to expected health effects. In addition, the unidentified semi-volatile compound must be identified in order to reach a risk conclusion about it.

3. In contrast to the statistical analysis for metals at the 317 impoundment, statistical analysis of metals at the 342 impoundment was performed by combining data from different horizons. Separate comparisons with the background area must be performed for shallow samples (1.5 -2.0 feet) and for deeper samples (17.5 - 21.0 feet). An appropriate t' must be calculated.

ATTACHMENT 2

4. The sampling report, "Verification Sampling Results at Selected RCRA Units, March 1988" must clearly discuss how the Appendix VIII sampling locations were chosen.

5. The Interim Response Action Plan, dated June 1989 included a proposal for pilot testing of an in-situ vapor extraction system for removal of VOC from the soil near the 317 impoundment. After the full extent of VOC contamination has been determined, pilot testing of the in-situ vapor extraction system must begin. An alternative remedial technique may also be proposed.

The September 1989 submittal "Construction of Vapor Extraction Vents and Vapor Probe Nests at 317 Area" mentions vapor extraction pilot tests, but no details are provided as to how the experiment will be designed and carried out. These details must be provided prior to beginning pilot testing.

II. BURN PIT AREA, BURN CAGE/PANS/RAILS AREA, & EAST FORK AREA

1. As discussed in item 3. above, data obtained by stratified random sampling should be evaluated by performing a statistical test on the various strata. For example, the data from the burn pit area might be analyzed by breaking it into two strata, 0 - 4.0 feet and 4.5 - 9.0 feet. Also, the study area may be divided vertically and the sub-areas compared with background. This should help in identifying possible hot spots which would not be obvious if all the data is averaged together. For example, the lead and cadmium at the East Fork Area seems to be limited to the top 2 feet.

2. For all tests where the number of samples in the study area and the background area differ, t' must be calculated. The March 1988 report used a constant 1.7 for all tests.

3. Data from the October 1987 study may also be used if it was obtained from an appropriate depth.

4. The indicator parameter data in tables 10, 11 and 12 of the March 1988 "Verification Sampling Results" report must be used to support the other heavy metal data.

5. Since above items may impact the interpretation of the soil sampling results for the three RCRA burning units, the Health Risk Assessment will be modified if necessary and then reviewed.

III. GROUNDWATER MONITORING

ATTACHMENT 2

1. W-2 is the only down gradient well at the 342 surface impoundment. At least two additional down gradient wells must be installed for a minimum detection monitoring system. Since statistical increases of EC have triggered assessment, more than two additional wells may be required to define the lateral and vertical extent of contamination.

2. a. Trip and field blanks must be labeled the same as samples so that the laboratory can not tell the difference.

   b. Field blanks must be collected under the same conditions as samples.

   c. Water level measurements must be accurate to the 100th of a foot. Since the last digit is not marked on the sounding tape, a ruler should be used to determine the last digit.

   d. TOX detection limits should be 5 ug/L according to SW846. If there is a reason the detection limit has been raised by the laboratory an explanation should be given.

3. Bermite must submit notification of a possible release from the 342 surface impoundment to both DHS and EPA. A statistical increase of electrical conductivity (EC) was determined in a report submitted on 26 October 1989 at which time Bermite had seven days to notify the Regional Administrator.

4. a. Monitoring wells W-4, W-5, and W-6 have not defined the lateral and vertical extent of contamination at the 317 surface impoundment area. Additional wells must be installed to determine the extent. The additional wells' data together with data from the existing wells must be delineated on a plume map.

   b. The lateral and vertical extent of VOC contamination in the vadose zone has not been determined. Additional ground water characterization must be based on an adequate vadose zone contamination delineation. Additional soil vapor probes must be installed until the entire plume of VOC contamination can be delineated.

   c. The stratigraphy at the Bermite facility has not been adequately characterized. When additional monitoring wells are installed at both surface impoundment areas, core and soil samples must be collected and together with existing data delineated on geologic cross

ATTACHMENT 2

sections. This data is crucial to placement of wells in a ground water monitoring system.

d. The constituents causing the EC increases at the 342 surface impoundment area need to be determined. If the facility believes that this EC is typical of ground water quality in this area of the facility, an additional up gradient well may have to be installed closer to the 342 area which would better represent background water quality. Also, sampling for additional parameters such as chloride may determine that non hazardous constituents are present and causing the EC increases.

IV. MISCELLANEOUS SOLID WASTE MANAGEMENT UNITS. Our review of the files indicates that solid or hazardous wastes may have been released from the following units:

1. Old Lead Azide Building and Sump:

According to the "Response to Information Needs" dated 11/4/87, soil samples were taken in the sump area and drainage area during April 1986, and showed less than 0.05 mg/l of lead. More details on this sampling are required, such as, the number, location, depth and rationale for the sampling points chosen, along with a plot plan of the unit. Additional soil sampling may be required.

2. Transfer Sump for Building 342:

This sump handled wash water from an operation which filled glass ampules of titanium tetrachloride. Titanium tetrachloride is toxic, reactive and corrosive and is an extremely hazardous waste in California. High chloride levels have been found in groundwater in the area where Building 342 existed. The location of the sump must be determined and soil samples tested for chloride.

3. Units mentioned in a Bermite company memo dated 8/26/82:

a.) The ravine above the phosphorous stabilizing area was apparently used for disposal of discarded drums. This area must be identified and sampled for hazardous waste and hazardous waste constituents. Past disposal practices may have affected groundwater at the 342 area.

ATTACHMENT 2

b.) The Hula Bowl area was apparently used as a general dump and was characterized as "a disaster area." Apparently, the area received "illegal industrial and sanitary waste," as well as dirty oil filters and was used as an oil changing station. A number of oil spills were also mentioned. This area must be identified and a sampling plan developed and implemented.

c.) Numerous spills were noted on the driveway and curbing at the paint storage area of building 228. This area must be identified and a sampling plan developed and implemented.

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES

TOXIC SUBSTANCES CONTROL DIVISION (REGION 3)
1405 N. SAN FERNANDO BOULEVARD, SUITE 300
BURBANK, CA 91504

NOV 8 - 1989

Mr. Glen Abdun Nur
Bermite Division, Whittaker Corp.
22116 West Soledad Canyon Road
Santa Clarita, CA 91350

Dear Mr. Abdun Nur:

WHITTAKER CORPORATION, BERMITE DIVISION, SANTA CLARITA, CA. EPA ID. #CAD064573108, PART A MODIFICATION; TREATED GROUNDWATER

This letter is to acknowledge receipt of your modified Part A application dated June 16, 1989 and corrected on July 6, 1989.

Your modified Part A application is hereby approved. The new hazardous waste management units consist of the soil vapor extraction and removal system and the activated carbon filter for the treatment of contaminated groundwater. Both new units must be operated in compliance with interim status standards found in 40 CFR Part 265 and Title 22, Division 4, Chapter 30 of the California Code of Regulations, including requirements for financial responsibility.

We understand that Whittaker has applied to the Regional Water Quality Control Board for an NPDES permit to continuously discharge treated groundwater. Once this NPDES permit is in effect, the groundwater treatment equipment and treated groundwater would no longer be subject to RCRA permitting and hazardous waste requirements.

We have also received a letter dated July 14, 1989 from Wenck Associates, Inc. which requested concurrence with the principle that contaminated groundwater which has been adequately treated be considered non-hazardous and not subject to RCRA Subtitle C regulation. That letter also requested permission to discharge treated groundwater.

Until such time as the NPDES discharge permit is in effect, DHS and EPA will consider such treated groundwater non-hazardous and not subject to hazardous waste regulations provided that all of the following conditions are met:

1. <u>Effluent Requirement:</u>

   <u>If any contaminants</u> from the waste management area <u>are present</u> in the treated groundwater above the "Detection Limits for Reporting purposes" (DLR, see item 8, below), the batch shall be re-treated or managed as hazardous waste.

2. Flow Rate:

The flow rate through the treatment system shall be a maximum of 1.5 gallons per minute.

3. Sample Location:

The sample shall be taken from the discharge side of the carbon filter, through a sampling tee, reducer, valve and small diameter teflon or stainless steel tubing.

4. Sampling Method:

Fill VOA vials at 100 ml/minute or less with the tubing below the water surface to minimize aeration and prevent air bubbles in the capped vials.

5. Sampling Frequency:

Sampling and discharge shall be done in a batch-wise manner. Treated effluent shall be sampled at least once per batch, within 1 hour of the end of the batch.

6. QA/QC, Sample Preservation and Chain of Custody:

These items shall be performed in the same manner as specified in Bermite's Sampling and Analysis Plan for RCRA Groundwater Monitoring Wells dated August 1988 or the most recent version thereof.

7. Chemical Analysis Method:

Samples shall be analyzed for volatile organic chemicals using the purge and trap method of sample preparation followed by the method 624 GC/MS technique.

8. Detection Limits:

The Chemical Analysis Method shall be performed in a manner to achieve the same detection limits (DLRs) required in the State's drinking water program. Twenty five (25) ml samples shall be used in the laboratory purge and trap procedure to obtain this sensitivity. The DLRs for the organic chemicals previously detected are: TCE, 0.5 ug/l; Perc, 0.5 ug/l; 1,1 DCE, 0.5 ug/l.

9. Chemical Analysis Parameters:

The laboratory shall report the concentrations or presence of all compounds which were detected above background levels during the groundwater monitoring program. If any other peaks are detected during testing of the influent to or

effluent from the carbon filter, they shall also be tentatively identified.

10. Discharge Location:

Treated groundwater shall be discharged down-gradient from the monitoring and assessment wells and away from the waste management area.

Should you have questions, please contact Alan Sorsher of the DHS Toxic Substances Control Program Region 3 office at (818) 567-3119.

Sincerely,

John A. Hinton, P.E., Chief
Facility Permitting Unit
Region 3
Toxic Substances Control Program
Department of Health Services

10/11/89
Date

Michael Feeley, Chief
State Programs Branch
Hazardous Waste Management Div.
U.S. EPA, Region IX

11/3/89
Date

cc: Norman Wenck
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STATE OF CALIFORNIA GEORGE DEUKMEJIAN, Governor

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD—
LOS ANGELES REGION
101 Centre Plaza Drive
Monterey Park, California 91754-2156
(213) 266-7500

October 20, 1989

Gordon J. Louttit, Vice President
Whittaker Corporation
10880 Wilshire Bl.
Los Angeles, CA 90024

WASTE DISCHARGE REQUIREMENTS - WHITTAKER CORPORATION, BERMITE DIVISION, SAUGUS (CA 0061069; CI 6891)

Reference is made to our letter dated October 11, 1989, which transmitted the waste discharge requirements, adopted by this Regional Board at the September 23, 1989, meeting, for your treated ground water discharge.

The copy transmitted did not include the Executive Officer's signature. Enclosed is the signed copy of the requirements.

We regret any inconvenience this may have caused.

If you have any questions, please call Greg Kwey at (213) 266-~~7504~~ 7615.

J. E. ROSS
Senior Water Resource
Control Engineer

cc: See attached mailing list

Enclosures

Environmental Protection Agency, Region 9, Administrative Service Division (W-5-1)
U.S. Army Corps of Engineers
Mr. Archie Matthews, State Water Resources Control Board, Division of Water Quality
Department of Fish and Game, Region 5
Department of Water Resources
Department of Health Services, Toxic Substance Division, Burbank
Department of Health Services, Public Water Supply Branch
South Coast Air Quality Management District
Los Angeles county Department of Public Works, Wastewater Management Division
Los Angeles County, Department of Health Services
Jones/Day, Reavis and Pogus

State of California
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD, LOS ANGELES REGION

ORDER NO. 89-090

NPDES NO. CA0061069

WASTE DISCHARGE REQUIREMENTS
FOR

WHITTAKER CORPORATION
(Bermite Division, Saugus)

The California Regional Water Quality Control Board, Los Angeles Region, finds:

1. Whittaker Corporation has filed a Report of Waste Discharge and has applied for waste discharge requirements and National Pollutant Discharge Elimination System (NPDES) permit.

2. Whittaker Corporation operated the Bermite Division at 22116 West Soledad Canyon Road, Saugus, California, until its closure on April 3, 1987. As a requirement of the RCRA closure plan, two of the RCRA units (317 area and 342 area) require a ground water monitoring system capable of detecting and assessing the impact of the RCRA units on the uppermost aquifer at the Bermite Facility.

3. The first and second quarterly sampling events, which took place in October of 1988 and January of 1989 respectively, did not detect any contamination of the ground water. However, three volatile organic compounds -trichloroethylene, tetrachloroethylene, and 1,1-dichloroethylene - were detected in monitoring well MW-4, as the results of the third sampling event in April of 1989.

4. Whittaker Corporation has proposed to remediate the contaminated ground water by pumping the ground water, removing any volatile organic compounds by filtration through granular activated carbon and, following analysis of the treated water, discharging it to the Santa Clara River via surface discharge.

5. The Board adopted a revised Water Quality Control Plan for the Santa Clara River Basin (4A) on April 27, 1978. The plan contained water quality objectives for Santa Clara River. The requirements contained in this Order, as they are met, will be in conformance with the goals of the Water Quality Control Plan.

6. The beneficial uses of the receiving waters are: agricultural supply, ground water recharge, fresh water replenishment, warm fresh water habitat, wildlife habitat, water contact recreation, and non-contact water recreation.

7. The issuance of waste discharge requirements for this discharge is exempt from the provisions of Chapter 3 (commencing with Section 21100) of Division 13 of the Public Resources Code in accordance with Water Code Section 13389.

The Board has notified the discharger and interested agencies and persons of its intent to issue waste discharge requirements for this discharge and has provided them with an opportunity to submit their written views and recommendations.

The Board in a public hearing heard and considered all comments pertaining to the discharge and to the tentative requirements.

This Order shall serve as a National Pollutant Discharge Elimination System permit pursuant to Section 402 of the Federal Clean Water Act, or amendments thereto, and shall take effect at the end of ten days from the date of its adoption provided the Regional Administrator, EPA, has no objections.

IT IS HEREBY ORDERED, that Whittaker Corporation, in order to meet the provisions contained in Division 7 of the California Water Code and regulations adopted thereunder, and the provisions of the Federal Clean Water Act and regulations and guidelines adopted thereunder, shall comply with the following:

A. Effluent Limitations

1. Waste discharged shall be limited to treated ground water only, as proposed.

2. The discharge of an effluent with constituents in excess of the following limits is prohibited:

Whittaker Corporation, Bermite Division CA0061069

Constituents	Units of Measurements	Discharge Limitations 30-Day Ave.	Maximum
Suspended solid	mg/l	50	150
Settleable solids	mg/l	0.1	0.3
Oil and grease	mg/l	10	15
Phenols	ug/l	----	1
Trichloroethylene	ug/l	----	5
Tetrachloroethylene	ug/l	----	4
1,1 dichloroethylene	ug/l	----	6
Benzene	ug/l	----	0.7
Toluene	ug/l	-----	10
Xylene	ug/l	-----	10
Ethylbenzene	ug/l	-----	10
Lead	ug/l	-----	50

3. The toxicity of the effluent shall be such that the average survival in undiluted effluent for any three consecutive 96-hour static or continuous flow bioassay tests shall be at least 90%, with no single test producing less than 70% survival.

4. The dry weather discharge of treated ground water effluent off-site of property owned or controlled by the discharger (Whittaker Corporation) is prohibited.

B. Requirements and Provisions

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1. Prior to the initiation of this ground water treatment project, a workplan shall be submitted to this Board for approval.

2. This Order includes the attached "Standard Provisions and General Monitoring and Reporting Requirements".

C. Expiration Date

This Order expires on September 10, 1994.

This discharger must file a Report of Waste Discharge in accordance with Title 23, California Administrative Code,

not later than 180 days in advance of such date as application for issuance of new waste discharge requirements.

I, Robert P. Ghirelli, Executive Officer, do hereby certify that the foregoing is a full, true and correct copy of an Order adopted by the California Regional Water Quality Control Board, Los Angeles Region on September 25, 1989.

Robert P. Ghirelli

ROBERT P. GHIRELLI, D.Env.
Executive Officer

GK/

State of California
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD, LOS ANGELES REGION

MONITORING AND REPORTING PROGRAM NO. CI 6891
FOR

WHITTAKER CORPORATION
(Bermite Division, Saugus)

The discharger shall implement this monitoring program on the effective date of this Order. The first monitoring report under this program is due by January 15, 1990. Following the October report, all additional monitoring analyses shall be compiled monthly and submitted as quarterly reports. The quarterly report submittals are due by the fifteenth day of the following months: January, April, July, and October.

Any instance of noncompliance shall be reported by telephone to Board staff as soon as discharger has knowledge of the noncompliance.

For treated groundwater discharges:

Constituent	Units	Type of Sample	Minimum Frequency of Analysis
Total waste flow	gal/day	----	daily
Trichloroethylene	ug/l	grab	daily[1]
Tetrachloroethlene	ug/l	grab	daily[1]
1,1-dichloroethylene	ug/l	grab	daily[1]
pH	pH units	grab	quarterly
Temperature	°F	grab	quarterly
Total Dissolved Solids	mg/l	grab	quarterly
Chloride	ml/l	grab	quarterly
Sulphate	mg/l	grab	quarterly
Suspended solids	mg/l	grab	quarterly
Settleable solids	ml/l	grab	quarterly
Oil and grease	mg/l	grab	quarterly
Phenols	mg/l	grab	quarterly
Nitrogen (NO_3+NO_2)	mg/l	grab	annually
Benzene	ug/l	grab	annually
Toluene	ug/l	grab	annually
Xylene	ug/l	grab	annually
Priority pollutants (listed in page T-3)	ug/l	grab	annually

[1]After one month of daily monitoring, the minimum frequency of monitoring shall be weekly; after five months of weekly monitoring, the minimum frequency of monitoring shall be monthly.

Whittaker Corporation, Bermite Division CA0061069

Constituent	Units	Type of Sample	Minimum Frequency of Analysis
Toxicity[2]	% survival	grab	quarterly

The report for the October - December quarter shall include the results for all annual analyses.

Ordered by: Robert P. Ghirelli
ROBERT P. GHIRELLI, D.Env.
Executive Officer

Date: September 25, 1989

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[2]By the method specified in "Guidelines for Performing Static Acute Toxicity Fish Bioassays in Municipal and Industrial Wastewater," July 1976 (California State Water Resources Control Board and Department of Fish and Game). Submission of bioassay results must include the information noted on page 31 of the "Guidelines". The fathead minnow (Pimephales promelas) may be used as the test species instead of the golden shiner (Notemigonus crysoleucas) If the results of toxicity tests yield a survival of less than 90%, the frequency of analyses shall be increased to weekly until at least three test results have been obtained and full compliance with Effluent Limitation A3 has been demonstrated, after which the frequency of analyses shall revert to quarterly.

Whittaker Corporation, Bermite Division CA0061069

PRIORITY POLLUTANTS

Metals

Antimony
Arsenic
Beryllium
Cadmium
Chromium
Copper
Lead
Mercury
Nickel
Selenium
Silver
Thallium
Zinc

Miscellaneous

Cyanide
Asbestos*

*Not required unless specifically requested.

Pesticides
(Method 625)

Aldrin
Chlordane
Dieldrin
4,4'-DDT'
4,4'-DDE
4,4'-DDD
Alpha Endosulfan
Beta Endosulfan
Endosulfan Sulfate
Endrin
Endrin Aldehyde
Heptachlor
Heptachlor Expoxide
Alpha BHC
Beta BHC
Gamma BHC
Delta BHC
Toxaphene
PCB 1016
PCB 1221
PCB 1232

Base/Neutral Extractibles
(EPA Method 625)

Acenaphthene
Benzidine
1,2,4-Trichlorobenzene
Hexachlorobenzene
Hexachloroethane
Bis (2-Chloroethyl) Ether
2-Chloronaphthalene
1,2-Dichlorobenzene
1,3-Dichlorobenzene
1,4-Dichlorobenzene
3,3'-Dichlorobenzidine
2,4-Dinitrotoluene
2,6-Dinitrotoluene
1,2-Diphenylhydrazine
Fluoranthene
4-Chlorophenyl Phenyl Ether
4-Bromophenyl Phenyl Ether
Bis (2-Chloroisopropyl) Ether
Bis (2-Chloroethoxy) Methane
Hexachlorobutadiene
Hexachlorocyclopentadiene
Isophorone
Naphthalene
Nitrobenzene
N-Nitrosodimethylamine
N-Nitrosodi-N-Propylamine
M-Nitrosodiphenylamine
Bis (2-Ethylhexyl) Phthalate
Butyl Benzyl Phthalate
Di-N-Butyl Phthalate
Di-N-Octyl Phthalate
Diethyl Phthalate
Dimethyl Phthalate
Benzo (A) Anthracene
Benzo (A) Pyrene
Benzo (B) Fluoranthene
Benzo (K) Fluoranthene
Chrysene
Acenaphthylene
Anthracene
1,12-Benzoperylene
Fluorene
Phenanthrene
1,2,5,6-Dibenzanthracene
Indeno (1,2,3-CD) Pyrene

Acid Extractibles
(EPA Method 625)

2,4,6-Trichlorophenol
P-Chloro-M-Cresol
2-Chlorophenol
2,4-Dichlorophenol
2,4-Dimethylphenol
2-Nitrophenol
4-Nitrophenol
2,4-Dinitrophenol
4,6-Dinitro-O-Cresol
Pentachlorophenol
Phenol

Volatile Organics
(EPA Method 624)

Acrolein
Acrylonitrile
Benzene
Carbon Tetrachloride
Chlorobenzene
1,2-Dichloroethane
1,1,1-Trichloroethane
1,1-Dichloroethane
1,1,2-Trichloroethane
1,1,2,2-Tetrachloroethane
Chloroethane
Chloroform
1,1-Dichloroethylene
1,2-TransDichloroethylene
1,2-Dichloropropane
1,2-Dichloropropylene
Ethylbenzene
Methylene Chloride
Methyl Chloride
Methyl Bromide
Bromoform
Bromodichloromethane
Dibromochloromethane
Tetrachloroethylene
Toluene
Trichloroethylene
Vinyl Chloride
2-Chloroethyl Vinyl Ether

Whittaker Corporation, Bermite Division CA0061069

PCB 1242	Pyrene
PCB 1248	TCDD
PCB 1254	
PCB 1260	

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION

STANDARD PROVISIONS AND GENERAL MONITORING AND REPORTING REQUIREMENTS

A. General Requirements

1. Neither the disposal nor any handling of waste shall cause pollution or nuisance.

2. Wastes discharged shall not contain any substances in concentrations toxic to human, animal, plant, or aquatic life.

3. This discharge shall not cause a violation of any applicable water quality standard for receiving waters adopted by the Regional Board or the State Water Resources Control Board as required by the Federal Clean Water Act and regulations adopted thereunder. If more stringent applicable water quality standards are promulgated or approved pursuant to Section 303 of the Federal Clean Water Act, or amendments thereto, the Board will revise and modify this Order in accordance with such more stringent standards.

4. Wastes discharged shall not contain visible oil or grease, and shall not cause the appearance of grease, oil or oily slick, or persistent foam in the receiving waters or on channel banks, walls, inverts or other structures.

5. Wastes discharged shall not increase the natural turbidity of the receiving waters at the time of discharge.

6. Wastes discharged shall not cause the formation of sludge deposits.

7. Wastes discharged shall not damage flood control structures or facilities.

8. Oil or oily material, chemicals, refuse, or other pollutionable materials shall not be stored or deposited in areas where they may be picked up by rainfall and carried off of the property or discharged to surface waters. Any spill of such materials shall be contained and removed immediately.

9. The pH of wastes discharged shall at all times be within the range 6.0 to 9.0.

10. The temperature of wastes discharged shall not exceed 100°F.

11. The discharge of any radiological, chemical, or biological warfare agent or high level radiological waste is prohibited.

TENTATIVE

Standard Provisions
and General Monitoring
and Reporting Requirements

12. Effluent limitation standards established pursuant to Section 301 of the Federal Clean Water Act and amendments thereto are applicable to the discharge.

B. General Provisions

1. The requirements prescribed herein do not authorize the commission of any act causing injury to the property of another, nor protect the discharger from his liabilities under federal, state, or local laws, nor guarantee the discharger a capacity right in the receiving waters.

2. These requirements do not exempt the operator of the waste disposal facility from compliance with any other laws, regulations, or ordinances which may be applicable; they do not legalize this waste disposal facility, and they leave unaffected any further restraint on the disposal of wastes at this site which may be contained in other statutes or required by other agencies.

3. The discharger must comply with all of the terms, requirements and conditions of this Order. Any violation of this Order constitutes a violation of the Clean Water Act, its regulations and the California Water Code, and is grounds for enforcement action, Order termination, Order revocation and reissuance, denial of an application for reissuance; or a combination thereof.

4. A copy of these waste discharge specifications shall be maintained at the discharge facility so as to be available at all times to operating personnel.

5. Any discharge of wastes at any point(s) other than specifically described in this Order is prohibited, and constitutes a violation of the Order.

6. The Regional Board, EPA, and other authorized representatives shall be allowed:

   (a) Entry upon premises where a regulated facility or activity is located or conducted, or where records are kept under the conditions of this Order;

   (b) Access to copy any records that are kept under the conditions of this Order;

   (c) to inspect any facility, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Order; and

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(d) To photograph, sample, and monitor for the purpose of assuring compliance with this Order, or as otherwise authorized by the Clean Water Act and the California Water Code.

7. If the discharger wishes to continue an activity regulated by this Order after the expiration date of this Order, the discharger must apply for and obtain a new Order.

8. The discharger shall comply with effluent standards or prohibitions established under Section 307(a) of the Clean Water Act for toxic pollutants within the time provided in the regulations that establish these standards or prohibitions, even if this Order has not yet been modified to incorporate the requirement. If a toxic effluent standard or prohibition is established for a toxic pollutant which is present in the discharge authorized herein and such standard or prohibition is more stringent than any limitation upon such pollutant in this Order, the Board will revise or modify this Order in accordance with such toxic effluent standard or prohibition and so notify the discharger.

9. After notice and opportunity for a hearing, this Order may be terminated or modified for cause, including, but not limited to:

(a) Violation of any term or condition contained in this Order;

(b) Obtaining this Order by misrepresentation, or failure to disclose all relevant facts;

(c) A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge.

10. In the event the discharger is unable to comply with any of the conditions of this Order due to:

(a) breakdown of waste treatment equipment;

(b) accidents caused by human error or negligence; or

(c) other causes such as acts of nature,

the discharger shall notify the Executive Officer by telephone as soon as he or his agents have knowledge of the incident and confirm this notification in writing within two weeks of the the telephone notification. The written notification shall include pertinent information explaining reasons for the non-compliance and shall indicate what steps were taken to correct the problem and the dates thereof, and what steps are being taken to prevent the problem from recurring.

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11. If there is any storage of hazardous or toxic materials or hydrocarbons at this facility and if the facility is not manned at all times, a 24-hour emergency response telephone number shall be prominently posted where it can easily be read from the outside.

12. The discharger shall take all reasonable steps to minimize or prevent any discharge that has a reasonable likelihood of adversely affecting human health or the environment.

13. The discharger shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) that are installed or used by the discharger to achieve compliance with this Order. Proper operation and maintenance includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems that are installed by a discharger only when necessary to achieve compliance with the conditions of this Order.

14. This Order may be modified, revoked and reissued, or terminated for cause. The filing of a request by the discharger for a modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any condition of this Order.

15. This Order does not convey any property rights of any sort, or any exclusive privilege.

16. The discharger shall furnish, within a reasonable time, any information the Regional Board or EPA may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this Order. The discharger shall also furnish to the Regional Board, upon request, copies of records required to be kept by this Order.

17. All applications, reports, or information submitted to the Regional Board shall be signed:

    (a) In the case of corporations, by a principal executive officer at least of the level of vice-president or his duly authorized representative, if such representative is responsible for the overall operation of the facility from which discharge originates;

    (b) In the case of a partnership, by a general partner;

    (c) In the case of a sole proprietorship, by the proprietor;

    (d) In the case of municipal, state or other public facility, by either a principal executive officer, ranking elected official, or other duly authorized employee.

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18. The discharger shall notify the Board of;

    (a) new introduction into such works of pollutants from a source which would be a new source as defined in Section 306 of the Federal Clean Water Act, or amendments thereto, if such source were discharging pollutants to the waters of the United States,

    (b) new introductions of pollutants into such works from a source which would be subject to Section 301 of the Federal Clean Water Act, or amendments thereto, if substantial change in the volume or character of pollutants being introduced into such works by a source introducing pollutants into such works at the time the waste discharge requirements were adopted.

    Notice shall include a description of the quantity and quality of pollutants and the impact of such change on the quantity and quality of effluent from such publicly owned treatment works. A substantial change in volume is considered an increase of ten percent in the mean dry-weather flow rate. The discharger shall forward a copy of such notice directly to the Regional Administrator.

19. The discharger shall notify the Board not later than 120 days in advance of implementation of any plans to alter production capacity of the product line of the manufacturing, producing or processing facility by more than ten percent. Such notification shall include estimates of proposed production rate, the type of process, and projected effects on effluent quality. Notification shall include submittal of a new report of waste discharge and appropriate filing fee.

20. The discharger shall give advance notice to the Regional Board as soon as possible of any planned physical alterations or additions to the facility or of any planned changes in the facility or activity that may result in noncompliance with requirements.

21. The discharger shall file with the Board a report of waste discharge at least 120 days before making any material change or proposed change in the character, location or volume of the discharge.

22. All existing manufacturing, commercial, mining, and silvicultural dischargers must notify the Regional Board as soon as they know or have reason to believe:

    (a) that any activity has occurred or will occur that would result in the discharge of any toxic pollutant that is not limited in this Order, if that discharge will exceed the highest of the following "notification levels:"

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(i) One hundred micrograms per liter (100 ug/l);

(ii) Two hundred micrograms per liter (200 ug/l) for acrolein and acrylonitrile; five hundred micrograms per liter (500 ug/l) for 2,4-dinitrophenol and 2-methyl-4,6-dinitrophenol; and one milligram per liter (1 mg/l) for antimony;

(iii) Five (5) times the maximum concentration value reported for that pollutant in the permit application; or

(iv) The level established by the Regional Board in accordance with 40 CFR 122.44(f).

(b) that they have begun or expect to begin to use or manufacture as an intermediate or final product or byproduct any toxic pollutant that was not reported in their application.

23. Bypass (the intentional diversion of waste streams from any portion of a treatment facility) is prohibited. The Regional Board may take enforcement action against the discharger for bypass unless:

(a) Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage. (Severe property damage means substantial physical damage to property, damage to the treatment facilities that causes them to become inoperable, or substantial and permanent loss of natural resources that can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.);

(b) There were no feasible alternatives to bypass, such as the use of auxiliary treatment facilities, retention of untreated waste, or maintenance during normal periods of equipment down time. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass that could occur during normal periods of equipment downtime or preventive maintenance; and

(c) The discharger submitted a notice at least ten days in advance of the need for a bypass to the Regional Board.

The discharger may allow a bypass to occur that does not cause effluent limitations to be exceeded, but only if it is for essential maintenance to assure efficient operation. In such a case, the above bypass conditions are not applicable.

The discharger shall submit notice of an unanticipated bypass as required in E-16.

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24. A discharger that wishes to establish the affirmative defense of an upset in an action brought for noncompliance shall demonstrate, through properly signed, contemporaneous operating logs, or other relevant evidence that:

    (a) an upset occurred and that the discharger can identify the cause(s) of the upset;

    (b) the permitted facility was being properly operated at the time of the upset;

    (c) the discharger submitted notice of the upset as required in E-16; and

    (d) the discharger complied with any remedial measures required.

    No determination made before an action for noncompliance, such as during administrative review of claims that noncompliance was caused by an upset, is final administrative action subject to judicial review.

    In any enforcement proceeding, the discharger seeking to establish the occurrence of an upset has the burden of proof.

25. This Order is not transferable to any person except after notice to the Regional Board. In the event of any change in name, ownership, or control of these waste disposal facilities, the discharger shall notify this Board of such change and shall notify the succeeding owner or operator of the existence of this Order by letter, copy of which shall be forwarded to the Board. The Regional Board may require modification or revocation and reissuance of the Order to change the name of the discharger and incorporate such other requirements as may be necessary under the Clean Water Act.

C. Enforcement

1. The California Water Code provides that any person who violates a waste discharge requirement or a provision of the California Water Code is subject to civil penalties of up to $5,000 per day, $10,000 per day, or $25,000 per day of violation, or when the violation involves the discharge of pollutants, is subject to civil penalties of up to $10 per gallon per day or $20 per gallon per day of violation; or some combination thereof, depending on the violation, or upon the combination of violations.

   Violation of any of the provisions of the NPDES program or of any of the provisions of this Order may subject the violator to any of the penalties described herein, or any combination thereof, at the discretion of the prosecuting authority; except that only one kind of penalty may be applied for each kind of violation.

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2. The Federal Clean Water Act (CWA) provides that any person who violates a permit condition implementing sections 301, 302, 306, 307, or 308 of the CWA is subject to a civil penalty not to exceed $10,000 per day of such violation. Any person who willfully or negligently violates permit conditions implementing these sections of the CWA is subject to a fine of not less than $2,500 nor more than $25,000 per day of violation, or by imprisonment for not more than 1 year, or both.

3. The Clean Water Act provides that any person who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained under this Order shall, upon conviction, be punished by a fine of not more than $10,000 per violation, or by imprisonment for not more than six months per violation, or by both.

4. It shall not be a defense for a discharger in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Order.

5. The Clean Water Act provides that any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this Order, including monitoring reports or reports of compliance or noncompliance shall, upon conviction, be punished by a fine of not more than $10,000 per violation, or by imprisonment for not more than 6 months per violation, or by both.

D. Monitoring Requirements

1. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity.

2. The discharger shall retain records of all monitoring information, including all calibration and maintenance monitoring instrumentation, copies of all reports required by this Order, and records of all data used to complete the Report of Waste Discharge and application for this Order, for a period of at least three years from the date of the sample, measurement, report, or application. This period may be extended by request of the Regional Board or EPA at any time and shall be extended during the course of any unresolved litigation regarding this discharge.

3. Records of monitoring information shall include:

   (i) The date, exact place, and time of sampling or measurements;

   (ii) The individual(s) who performed the sampling or measurements;

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(iii) The date(s) analyses were performed;

(iv) The individual(s) who performed the analyses;

(v) The analytical techniques or methods used; and

(vi) The results of such analyses.

4. All sampling, sample preservation, and analyses must be conducted according to test procedures under 40 CFR Part 136, unless other test procedures have been specified in this Order.

5. All chemical, bacteriological, and bioassay analyses shall be conducted at a laboratory certified for such analyses by the State Water Resources Control Board or approved by the Executive Officer .

6. The discharger shall calibrate and perform maintenance procedures on all monitoring instruments and equipment to insure accuracy of measurements, or shall insure that both activities will be conducted.

7. The discharger shall have, and implement, an acceptable written quality assurance (QA) plan for laboratory analyses. The annual monitoring report required in E-8 shall also summarize the QA activities for the previous year. Duplicate chemical analyses must be conducted on a minimum of ten percent (10%) of the samples, or at least one sample per sampling period, whichever is greater. A similar frequency shall be maintained for analyzing spiked samples.

   When requested by the Board or EPA, the discharger will participate in the NPDES discharge monitoring report QA performance study. The discharger must have a success rate equal to or greater than 80%.

8. Effluent samples shall be taken downstream of any addition to the treatment works and prior to mixing with the receiving waters.

9. For parameters where both 30-day average and maximum limits are specified but where the monitoring frequency is less than four times a month, the following procedure shall apply:

   (a) Initially, beginning not later than the first week of the second month after the adoption of this permit, a representative sample shall be obtained of each waste discharge at least once per week for at least four consecutive weeks <u>and</u> until compliance with the 30-day average limit has been demonstrated. Once compliance has been demonstrated, sampling and analyses shall revert to the frequency specified.

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(b) If future analyses of two successive samples yield results greater than 90% of the maximum limit for a parameter, the sampling frequency for that parameter shall be increased (within one week of receiving the laboratory result on the second sample) to a minimum of once weekly until at least four consecutive weekly samples have been obtained and compliance with the 30-day average limit has been demonstrated again and the discharger has set forth for the approval of the Executive Officer a program which ensures future compliance with the 30-day average limit.

E. Reporting Requirements

1. The discharger shall file with the Board technical reports on self-monitoring work performed according to the detailed specifications contained in any Monitoring and Reporting Programs as directed by the Executive Officer.

2. In reporting the monitoring data, the discharger shall arrange the data in tabular form so that the date, the constituents, and the concentrations are readily discernable. The data shall be summarized to demonstrate compliance with waste discharge requirements and, where applicable, shall include results of receiving water observations.

3. For every item where the requirements are not met, the discharger shall submit a statement of the actions undertaken or proposed which will bring the discharge into full compliance with requirements at the earliest time and submit a timetable for correction.

4. The discharger shall submit to the Board, together with the first monitoring report required by this permit, a list of all chemicals and proprietary additives which could affect this waste discharge, including quantities of each. Any subsequent changes in types and/or quantities shall be reported promptly.

5. The discharger shall file a technical report with this Board not later than 30 days after receipt of this Order, relative to the operation and maintenance program for this waste disposal facility. The information to be contained in that report shall include, as a minimum, the following:

   (a) The name and address of the person or company responsible for operation and maintenance of the facility.

   (b) Type of maintenance (preventive or corrective).

   (c) Frequency of maintenance, if preventive.

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Standard Provisions
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If an operation and maintenance report has been supplied to the Board previously and there have been no changes, a second report need not be provided.

6. Monitoring results shall be reported at the intervals specified in the Monitoring and Reporting Program.

   (i) Monitoring results must be reported on a Discharge Monitoring Report (DMR).

   (ii) If the discharger monitors any pollutant more frequently than required by this Order using test procedures approved under 40 CFR Part 136 or as specified in this Order, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the DMR.

   (iii) Calculations for all limitations that require averaging of measurements shall utilize an arithmetic mean unless otherwise specified in this Order.

7. Reports of compliance or noncompliance with, or any progress reports on interim and final requirements contained in any compliance schedule of this Order shall be submitted no later than 14 days following each schedule date.

8. By March 1 of each year, the discharger shall submit an annual report to the Board. The report shall contain both tabular and graphical summaries of the monitoring data obtained during the previous year. In addition, the discharger shall discuss the compliance record and the corrective actions taken or planned which may be needed to bring the discharge into full compliance with the waste discharge requirements.

9. The discharger shall include in the annual report, an annual summary of the quantities of all chemicals, listed by both trade and chemical names, which are used for cooling and/or boiler water treatment and which are discharged.

10. Each monitoring report must affirm in writing that:

    "All analyses were conducted at a laboratory certified for such analyses by the State Water Resources Control Board or approved by the Executive Officer and in accordance with current EPA guideline procedures or as specified in this Monitoring Program".

11. Each report shall contain the following completed declaration:

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"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Executed on the _____ day of _____
at _____.

_____(Signature)

_____(Title)"

12. If no flow occurred during the reporting period, the monitoring report shall so state.

13. For any analyses performed for which no procedure is specified in the EPA guidelines or in the Monitoring and Reporting Program, the constituent or parameter analyzed and the method or procedure used must be specified in the monitoring report.

14. This Board requires the discharger to file with the Board, within 90 days after the effective date of this Order, a technical report on his preventive (failsafe) and contingency (cleanup) plans for controlling accidental discharges, and for minimizing the effect of such events. The technical report should:

    (a) Identify the possible sources of accidental loss, untreated waste bypass, and contaminated drainage. Loading and storage areas, power outage, waste treatment unit outage, and failure of process equipment, tanks and pipes should be considered.

    (b) Evaluate the effectiveness of present facilities and procedures and state when they became operational.

    (c) Describe facilities and procedures needed for effective preventive and contingency plans.

    (d) Predict the effectiveness of the proposed facilities and procedures and provide an implementation schedule containing interim and final dates when they will be constructed, implemented, or operational.

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This Board, after review of the technical report, may establish conditions which it deems necessary to control accidental discharges and to minimize the effects of such events. Such conditions may be incorporated as part of this Order, upon notice to the discharger.

15. In the event wastes are transported to a different disposal site during the report period, the following shall be reported in the monitoring report:

    (a) Types of wastes and quantity of each type;

    (b) Name and address for each hauler of wastes (or method of transport if other than by hauling); and

    (c) Location of the final point(s) of disposal for each type of waste.

    If no wastes are transported offsite during the reporting period, a statement to that effect shall be submitted.

16. The discharger shall report any noncompliance that may endanger health or the environment. Any information shall be provided orally within 24 hours from the time the discharger becomes aware of the circumstances. A written submission shall also be provided within five days of the time the discharger becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times and, if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.

    The following shall be included as information that must be reported within 24 hours under this paragraph:

    (a) Any unanticipated bypass that exceeds any effluent limitation in the Order.

    (b) Any upset that exceeds any effluent limitation in the Order.

    (c) Violation of a maximum daily discharge limitation for any of the pollutants listed in this Order to be reported within 24 hours.

    The Regional Board may waive the above-required written report on a case-by-case basis.

17. Should the discharger discover that it failed to submit any relevant facts or that it submitted incorrect information in a report, it shall promptly submit the missing or correct information.

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18. The discharger shall report all instances of noncompliance not otherwise reported at the time monitoring reports are submitted. The reports shall contain all information listed in E-16.

19. Each monitoring report shall state whether or not there was any change in the discharge as described in the Order during the reporting period.

20. The discharger shall mail a copy of each monitoring report to:

    (a) EXECUTIVE OFFICER
    CALIFORNIA REGIONAL WATER QUALITY
    CONTROL BOARD - LOS ANGELES REGION
    107 South Broadway - Room 4027
    Los Angeles, CA 90012-4596

    (b) A copy of such monitoring report for those discharges designated as a major discharge shall also be mailed to:

    REGIONAL ADMINISTRATOR
    ENVIRONMENTAL PROTECTION AGENCY
    Region 9
    215 Fremont Street
    San Francisco, CA 94105

F. Publicly Owned Wastewater Treatment Plant Requirements (Does not apply to any other type or class of discharger)

1. Publicly owned treatment works (POTWs) must provide adequate notice to the Regional Board of:

    (a) Any new introduction of pollutants into the POTW from an indirect discharger that would be subject to sections 301 or 306 of the Clean Water Act if it were directly discharging those pollutants.

    (b) Any substantial change in the volume or character of pollutants being introduced into that POTW by a source introducing pollutants into the POTW at the time of issuance of the Order.

    Adequate notice shall include information on the quality and quantity of effluent introduced into the POTW as well as any anticipated impact of the change on the quantity or quality of effluent to be discharged from the POTW.

2. The discharger shall file a written report with the Board within 90 days after the average dry-weather waste flow for any month equals or exceeds 75 percent of the design capacity of his waste treatment and/or disposal facilities. The discharger's senior administrative officer shall sign a letter which transmits that report and certifies

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that the policy-making body is adequately informed about it. The report shall include:

(a) Average daily flow for the month, the date on which the instantaneous peak flow occurred, the rate of that peak flow, and the total flow for that day.

(b) The discharger's best estimate of when the average daily dry-weather flow rate will equal or exceed the design capacity of his facilities.

(c) The discharger's intended schedule for studies, design, and other steps needed to provide additional capacity for his waste treatment and/or disposal facilities before the waste flow rate equals the capacity of present units.

3. The flow measurement system shall be calibrated at least once per year or more frequently, to ensure continued accuracy.

4. The discharger shall require any industrial user of the treatment works to comply with applicable service charges and toxic pretreatment standards promulgated in accordance with Sections 204(b), 307, and 308 of the Federal Clean Water Act or amendments thereto. The discharger shall require each individual user to submit periodic notice (over intervals not to exceed nine months) of progress toward compliance with applicable toxic and pretreatment standards developed pursuant to the Federal Clean Water Act or amendments thereto. The discharger shall forward a copy of such notice to the Board and the Regional Administrator.

5. Collected screening, sludges, and other solids removed from liquid wastes shall be disposed of at a legal point of disposal, and in accordance with the provisions of Division 7 of the California Water Code. For the purpose of this requirement, a legal point of disposal is defined as one for which waste discharge requirements have been prescribed by a Regional Water Quality Control Board and which is in full compliance therewith.

6. Supervisors and operators of publicly owned wastewater treatment plants shall possess a certificate of appropriate grade in accordance with regulations adopted by the State Water Resource Control Board.

The annual report required by E-8 shall address operator certification and provide a list of current operating personnel and their grade of certification. The report shall include the date of each facility's Operation and Maintenance Manual, the date the manual was last reviewed, and whether the manual is complete and valid for the current facilities. The report shall restate, for the record, the laboratories used by the discharger to monitor compliance with this order and permit and provide a summary of performance.

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G. Definitions

1. "Bypass" means the intentional diversion of waste streams from any portion of a treatment facility whose operation is necessary to maintain compliance with the terms and conditions of this Order.

2. "Composite sample" means, for flow rate measurements, the arithmetic mean of no fewer than eight individual measurements taken at equal intervals for 24 hours or for the duration of discharge, whichever is shorter.

   "Composite sample" means, for other than flow rate measurement,

   (a) A combination of at least eight individual portions obtained at equal time intervals for 24 hours, or the duration of the discharge, whichever is shorter. The volume of each individual portion shall be directly proportional to the discharge flow rate at the time of sampling.

   OR

   (b) A combination of at least eight individual portions of equal volume obtained over a 24-hour period. The time interval will vary such that the volume of wastewater discharged between samplings remains constant.

   The compositing period shall equal the specified sampling period, or 24 hours, if no period is specified.

3. "Daily discharge" means:

   (a) For flow rate measurements, the average flow rate measured during a calendar day or during any 24-hour period reasonably representative of the calendar day for purposes of sampling.

   (b) For pollutant measurements, the concentration or mass emission rate measured during a calendar day or during any 24-hour period reasonably representative of the calendar day for purposes of sampling.

4. The "daily discharge rate" shall be obtained from the following calculation for any calendar day:

$$\text{Daily discharge rate} = \frac{8.34}{N} \sum_{1}^{N} Q_i C_i$$

   in which N is the number of samples analyzed in any calendar day, Q_i and C_i are the flow rate (MGD) and the constituent concentration (mg/l) respectively, which are associated with each of the N grab samples which may be taken in any calendar day. If a composite

TENTATIVE

sample is taken, C_i is the concentration measured in the composite sample and Q_i is the average flow rate occurring during the period over which samples are composited.

5. "Daily maximum" limit means the maximum acceptable "daily discharge." For pollutant measurements, unless otherwise specified, the results to be compared to the "daily maximum" limit are based on "composite samples."

6. "Duly authorized representative" is one whose:

   (a) Authorization is made in writing by a principal executive officer or ranking elected official;

   (b) Authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity, such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company. (A duly authorized representative may thus be either a named individual or any individual occupying a named position.); and

   (c) Written authorization is submitted to the Regional Board and EPA Region 9. If an authorization becomes no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements above must be submitted to the Regional Board and EPA Region 9 prior to or together with any reports, information, or applications to be signed by an authorized representative.

7. "Grab sample" is defined as any individual sample collected in a short period of time not exceeding 15 minutes. "Grab samples" shall be collected during normal peak loading conditions for the parameter of interest, which may or may not be during hydraulic peaks. It is used primarily in determining compliance with "daily maximum" limits and the "instantaneous maximum" limits.

8. "Hazardous substance" means any substance designated under 40 CFR 116 pursuant to Section 311 of the Clean Water Act.

9. "Heavy metals" are for purposes of this Order, arsenic, cadmium, chromium, copper, lead, mercury, silver, nickel,, and zinc.

10. "Instantaneous maximum" concentration is defined as the maximum value measured from any single "grab sample."

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11. "Median" of an ordered set of values is that value below and above which there is an equal number of values, or which is the arithmetic mean of the two middle values, if there is no one middle value.

12. "Priority pollutants" are those constituents referred to in 40 CFR 401.15 and listed in the EPA NPDES Application Form 2C, pp. V-3 thru V-9.

13. "6-month median" means a moving "median" of daily values for any 180-day period in which daily values represent flow-weighted average concentrations within a 24-hour period. For intermittent discharges, the daily value shall be considered to equal zero for days on which no discharge occurred.

14. "7-day" and "30-day average" shall be the arithmetic average of the values of daily discharge calculated using the results of analyses of all samples collected during any 7 and 30 consecutive calendar day periods, respectively.

15. "Toxic pollutant" means any pollutant listed as toxic under Section 307(a)(1) of the Clean Water Act or under 40 CFR 122, Appendix D.

16. "Upset" means an exceptional incident in which there is unintentional and temporary noncompliance with effluent limitations because of factors beyond the reasonable control of the discharger. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper action.

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S. TE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES

TOXIC SUBSTANCES CONTROL DIVISION (REGION 3)
1405 N. SAN FERNANDO BOULEVARD, SUITE 300
BURBANK, CA 91504

OCT 11 1989

Mr. Glen Abdun Nur
Bermite Division, Whittaker Corp.
22116 West Soledad Canyon Road
Santa Clarita, CA 91350

Dear Mr. Abdun Nur:

CLEAN CLOSURE CERTIFICATION ACKNOWLEDGEMENT - STORAGE UNITS E1, E2, E3, 502, 504, 506, AT WHITTAKER CORPORATION, BERMITE DIVISION, SANTA CLARITA, CA. EPA ID. #CAD064573108

The Department of Health Services has received the owner's and engineer's certification that a portion of your facility has been closed in accordance with the approved closure plan. This letter is to inform you that the Department now considers the <u>above-referenced</u> hazardous waste management units officially closed.

Pursuant to section 67013 of Title 22, Division 4, Chapter 30 of the California Code of Regulations, Whittaker is released from the requirement to maintain financial assurance for closure of the above-referenced units.

This acknowledgment and release is for the above-referenced units <u>only</u> and is based on the assumption that the information submitted in the certification as well as any information used as a basis for this decision is accurate. Any inaccuracies found in this information may be grounds for nullification of this clean closure certification and potential enforcement action. The Owner/Operator must inform the Department of any deviations from or changes in the information provided which would affect the clean closure certification for the above-referenced units.

Please be advised that this acknowledgment of partial facility closure is not a certification that your facility does not pose any environmental or public health threat. This letter does not remove any liabilities associated with past hazardous waste management practices which occurred on the site.

Should you have questions, please contact Alan Sorsher of this office at (818) 567-3119.

Sincerely,

John A. Hinton, P.E., Chief
Facility Permitting Unit

cc: Norman Wenck
Wenck Associates,
832 Twelve Oaks Center
15500 Wayzata Blvd.
Wayzata, MN 55391

Anastacio Medina, LA County Haz. Waste Program
2615 S. Grand Ave., 6th Floor
Los Angeles, CA 90007

David W. Hogan, Assistant Planner
City of Santa Clarita
23920 Valencia Blvd. Suite 300
Santa Clarita, CA 91355

Mr. Gordon Louttit
Vice President
Whittaker Corporation
10880 Wilshire Boulevard
Los Angeles, California 90024

Paul Blais
Hazardous Waste Management Unit
Toxic Substances Control Program
714/744 P Street
P.O. Box 924732
Sacramento, CA 94234-7320

Lucille Van Omerring
Financial Responsibility Unit
Toxic Substances Control Program
714/744 P Street
P.O. Box 924732
Sacramento, CA 94234-7320

Jan Palumbo/Jim Breitlow
U.S. EPA, Region IX
215 Fremont Street
San Francisco, CA 94105

Mr. Al Simmons
Whittaker Corporation
P.O. Box 708
Richardson, Texas 75080

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES

TOXIC SUBSTANCES CONTROL DIVISION (REGION 3)
1405 N. SAN FERNANDO BOULEVARD, SUITE 300
BURBANK, CA 91504

September 19, 1989

Mr. Jim Ross
Senior Water Resources Control Engineer
California Regional Water Quality Control Board
Los Angeles Region
101 Centre Plaza Drive
Monterey Park, CA 91754

Dear Mr. Ross:

WHITTAKER CORPORATION, BERMITE DIVISION, SANTA CLARITA, CA.
TENTATIVE NPDES PERMIT CA0061069; TREATED GROUNDWATER

This letter is to transmit our comments on the above-referenced tentative Waste Discharge Requirements and NPDES permit for the facility located 22116 West Soledad Canyon Road, Santa Clarita, CA., EPA ID # CAD 064573108.

1. Treatment Equipment:

The applicant should provide a second carbon filter in series with the primary carbon filter to ensure that effluent requirements are continuously met. In our conversations with the applicant, they have indicated that this additional requirement is acceptable to them.

2. Sample Location:

Samples should be taken from the inlet and discharge of the primary (first) carbon filter and the discharge of the secondary filter, through a sampling tee, reducer, valve and small diameter teflon or stainless steel tubing.

3. Sampling Method:

VOA vials should be filled at a flow of 100 ml/minute or less with the tubing below the water surface to minimize aeration and prevent air bubbles in the capped vials.

4. Sampling Frequency:

Influent and treated effluent should be sampled daily for the first two weeks of operation, weekly for the next month, and monthly thereafter until the primary filter has reached 80% of its theoretical capacity. This should be estimated by multiplying the average influent concentration of organic

contaminants by the total flow put through the filter. Once the filter has reached 80% of its capacity, the sampling frequency should be increased to a weekly schedule or the filter media changed.

5. QA/QC, Sample Preservation and Chain of Custody:

These items should be performed in the same manner as specified in Bermite's Sampling and Analysis Plan for RCRA Groundwater Monitoring Wells dated August 1988 or the most recent version thereof.

6. Chemical Analysis Method:

Samples should be analyzed for volatile organic chemicals using the purge and trap method of sample preparation followed by the method 624 GC/MS technique.

7. Detection Limits:

The Chemical Analysis Method should be performed in a manner to achieve the same detection limits required in the State's drinking water program (known as DLRs or Detection Limit for Reporting purposes). Twenty five (25) ml samples should be used in the laboratory purge and trap procedure to obtain this sensitivity. The DLRs for the organic chemicals previously detected are: TCE, 0.5 ug/l; Perc, 0.5 ug/l; 1,1 DCE, 0.5 ug/l.

8. Chemical Analysis Parameters:

The laboratory should report the concentrations or presence of all compounds which were detected above background levels during the RCRA groundwater monitoring program. If any other contaminants are detected during testing of the influent to or effluent from the carbon filter, they should also be tentatively identified.

9. Effluent Requirement:

If any contaminants from the waste management area are present in the effluent from the primary filter above the DLR, the system should be immediately shut down and the filter media changed.

10. Discharge Location:

Treated groundwater should be discharged down-gradient from the monitoring and assessment wells and away from the waste management area.

Should you have questions, please contact Alan Sorsher of our office at (818) 567-3119.

Sincerely,

for John A. Hinton, P.E., Chief
Facility Permitting Unit
Region 3
Toxic Substances Control Program
Department of Health Services

cc: Norman Wenck
Wenck Associates,
832 Twelve Oaks Center
15500 Wayzata Blvd.
Wayzata, MN 55391

Anastacio Medina, LA County Haz. Waste Program
2615 S. Grand Ave., 6th Floor
Los Angeles, CA 90007

Robert Ghirelli, Executive Officer
Regional Water Quality Control Board, Los Angeles
101 Centre Plaza Drive
Monterey Park, CA 91754-2156

Mr. James Breitlow
U. S. Environmental Protection Agency
Region IX
215 Fremont Street
San Francisco, California 94105

Paul Blais
Hazardous Waste Management Unit
Toxic Substances Control Program
714/744 P Street
P.O. Box 924732
Sacramento, CA 94234-7320

Lucille Van Omerring
Financial Responsibility Unit
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714/744 P Street
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Sacramento, CA 94234-7320

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

GEORGE DEUKMEJIAN, *Governor*

DEPARTMENT OF HEALTH SERVICES
714/744 P STREET
SACRAMENTO, CA 95814
(916) 324-2423

NOV 28 1988

Gordon J. Louttit
Vice President
Whittaker Corporation
10880 Wilshire Boulevard
Los Angeles, California 90024-9990

CERTIFIED MAIL

Dear Mr. Louttit:

REPORT OF VIOLATION
EPA ID #CAD064573108

On September 7, 1988, the Department of Health Services completed a review of the financial responsibility file for the above-named facility located at 22116 West Soledad Canyon Road in Saugus, California.

As a result of this review, we have determined that the facility is in violation of the following:

- Title 22, California Code of Regulations (CCR), sections 67027 and 67028 by failing to provide liability coverage for sudden and non-sudden accidental occurrences; and

- Title 22, CCR, section 67015 by failing to provide evidence of financial assurance for post-closure costs.

Please submit the following immediately:

1. A certificate of insurance, financial test, or alternative mechanism to demonstrate liability coverage ($1 million per occurrence per facility with a $2 million annual aggregate per facility for sudden accidental occurrences; and $3 million per occurrences per facility with a $6 million annual aggregate per facility for non-sudden accidental occurrences).

2. Financial documents for post-closure care costs in the form of a trust fund, surety bond, letter of credit, post-closure insurance, a financial test/corporate guarantee, or alternative mechanism. Please ensure that the financial assurance adequately covers the current post-closure care estimate. Our file indicates a post-closure cost estimate of $750,000 as of October 22, 1987.

   NOTE: The required wording and forms are enclosed.

The issuance of this Report of Violation does not preclude the Department from taking administrative, civil, or criminal action related to the violations noted herein.

This Report of Violation supersedes and replaces the Report of Violation dated October 17, 1988.

If you have any questions regarding this Report of Violation, please contact Nancy Jestreby at (916) 324-1804.

Sincerely,

Caroline Cabias

Caroline Cabias, Chief
Hazardous Waste Management Section
Toxic Substances Control Division

Enclosures

cc: Alan Sorsher
Permit Unit
Region 3

Dave Chase
Surveillance and Enforcement
Region 3

Arnold Robbins
EPA - Region IX

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

GEORGE DEUKMEJIAN, *Governor*

DEPARTMENT OF HEALTH SERVICES
714/744 P STREET
SACRAMENTO, CA 95814
(916) 324-2423

Gordon J. Louttit
Vice President
Whittaker Corporation
10880 Wilshire Boulevard
Los Angeles, California 90024-9990

OCT 17 1988

CERTIFIED MAIL

Dear Mr. Louttit:

REPORT OF VIOLATION
EPA ID #CAD064573108

On September 7, 1988, the Department of Health Services completed a review of the financial responsibility file for the above-named facility located at 22116 West Soledad Canyon Road in Saugus, California.

As a result of this review, we have determined that the facility is in violation of the following:

- Title 22, California Code of Regulations (CCR), sections 67027 and 67028 by failing to provide liability coverage for sudden occurrences; and

- Title 22, CCR, section 67015 by failing to provide evidence of financial assurance for post-closure costs.

Please submit the following immediately:

1. A certificate of insurance, financial test, or alternative mechanism to demonstrate liability coverage ($1 million per occurrence per facility with a $2 million annual aggregate per facility for sudden accidental occurrences).

2. Financial documents for post-closure care costs in the form of a trust fund, surety bond, letter of credit, closure or post closure insurance, a financial test/corporate guarantee, or alternative mechanism.

   NOTE: The required wording and forms are enclosed.

The issuance of this Report of Violation does not preclude the Department from taking administrative, civil, or criminal action related to the violations noted herein.

If you have any questions regarding this Report of Violation, please contact Nancy Jestreby at (916) 324-1804.

Sincerely,

Caroline Cabias

Caroline Cabias, Chief
Hazardous Waste Management Section
Toxic Substances Control Division

Enclosures

cc: Permit Unit
Region 3

Alan Sorsher
Surveillance and Enforcement
Region 3

Arnold Robbins
EPA - Region IX

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

GEORGE DEUKMEJIAN, *Governor*

DEPARTMENT OF HEALTH SERVICES
714/744 P STREET
SACRAMENTO, CA 95814

(916) 324-2423

Alan D. Jacobson
Executive Vice President
Whittaker Corporation
10880 Wilshire Boulevard
Los Angeles, California 90024-9990

JUN 22 1988

CERTIFIED MAIL

Dear Mr. Jacobson:

REPORT OF VIOLATION
EPA ID #CAD064573108

On June 7, 1988, the Department of Health Services completed a review of the financial responsibility file for the above-named facility located at 22116 West Soledad Canyon Road in Sangus, California.

As a result of this review, we have determined that the facility is in violation of Title 22 California Code of Regulations section 67027 by failing to provide liability coverage for sudden accidental occurrences.

Please submit the following immediately:

> A certificate of insurance, financial test, or alternative mechanism to demonstrate liability coverage ($1 million per occurrence per facility with a $2 million annual aggregate per facility for sudden accidental occurrences). The required wording and forms are enclosed.

The issuance of this Report of Violation does not preclude the Department from taking administrative, civil, or criminal action related to the violations noted herein.

If you have any questions regarding this Report of Violation, please contact Nancy Jestreby at (916) 324-1804.

Sincerely,

Caroline Cabias

Caroline Cabias, Chief
Hazardous Waste Management Section
Toxic Substances Control Division

Enclosures

(see cc: list next page)

cc: Permit Unit
Southern California Section

Surveillance and Enforcement
Southern California Section

Arnold Robbins
EPA - Region IX

SOUTHERN CALIFORNIA SECTION
TOXIC SUBSTANCES CONTROL DIVISION

TELECOPY SLIP

TO : MIKE FERNANDEZ
(NAME)

415-974-7965
(CONTACT NUMBER)

T-2

4/14/88
(DATE)

FROM: ALAN SORSHER
(NAME)

(213) 620-2380
(CONTACT NUMBER)

Bermite Closure Plans
(SUBJECT)

NO. OF PAGES 2

CONFIDENTIAL ____

URGENT X

OTHER ____

TO: Michael Fenwday
EPA REGION IX

FROM: Allan Sorsher
DHS, L.A

4/14/88

Mike:

As we agreed, here are our thoughts on Wenck's 3/22 and 3/28 proposal. Harry Sneh and I have discussed this and I have subsequently discussed our questions with Chris Thompson.

1. We had questions about how the locations for the new trenches were chosen and why not do some borings first to indicate where to place the trenches. Chris indicated that the trenchs were located taking into account the recent borings at 317 under the closure plan as well as the borings they did last summer.

2. Chris agreed to sample again for BNA's (2 samples from each trench) at areas of high VOC. How high?

3. They will submit an additional boring plan focusing more on the first trench area in addition to the current proposal. location t.b.d. by trenching

4. Harry and I feel that their trenching plan is OK as the next

further work will be done.
I told Chris to send you a letter confirming items 1-4.

They have gotten approval from SCAQMD for excavation, but Chris was uncertain about some conditions SCAQMD added relating to management of excavated dirt. I haven't seen a copy of the SCAQMD letter, but I told Chris he should get this clarified before commencing.

(I am also mailing to you a copy of SCAQMD'S Rule 1150 and their risk analysis for certain volatiles.)

We also will need to get more details of their VOC sampling during borings. Chris + I agreed to discuss this in the near future - it shouldn't be a reason to hold up their trenching.

I'll call you when I get back from New York. In the meantime you can call Harry @ 213-620-2962.

Alan.

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES
107 SOUTH BROADWAY, ROOM 7011
LOS ANGELES, CA 90012
(213) 620-2380

March 23, 1988

Mr. Christopher Thompson
Project Manager
Wenck Associates, Inc.
Twelve Oaks Center
15500 Wayzata Blvd.
Wayzata, MN 55391

Dear Mr. Thompson:

WHITTAKER-BERMITE GROUNDWATER SAMPLING AND ANALYSIS PLAN
EPA I.D. # CAD 064 573 108

The EPA and this Department's permitting and assessment and mitigation staff have reviewed the "Proposed Interim Status Groundwater Monitoring Sampling and Analysis Program" submitted to us with your letter of December 24, 1987.

In comparing the proposed program against the regulations and the EPA Technical Enforcement Guidance Document, we find that a number of revisions are necessary before the program can be approved for formal groundwater monitoring. These are noted in the enclosed Notice of Deficiency. The program must be revised as indicated and resubmitted.

The Los Angeles Regional Water Quality Control Board has not reviewed the plan and may indicate further deficiencies following a future staff review or field inspection.

If you have any questions, please contact Alan Sorsher at the above telephone number.

Sincerely,

John A. Hinton, P.E., Chief
Facility Permitting Unit
Southern California Section
Toxic Substances Control Division

cc: Michael Fernandez
EPA Region IX
215 Fremont St.
San Francisco, CA 94105

Larry Peterson
RWQCB, LA

Liz Lafferty, DHS, LA
Dave Schwartzbart, DHS, LA

NOTICE OF DEFICIENCIES
WHITTAKER CORPORATION, BERMITE DIVISION
CAD 064 573 108

1. Water Level Elevation - The program must routinely include a measurement to the bottom of the well. The plan must indicate that the wells will be surveyed by a licensed surveyor.

2. The plan must state that if immiscibles are detected in the future, the sampling and analysis plan will be revised to account for them.

3. Purging

   - The plan must describe the purge pump and the field screening and disposition of the purged water per page 104 of the TEGD.

   - As a guide for the sampling technician in the field, the plan must specify the purge volumes in gallons/foot of well casing.

   - Elevations of the pumps relative to the screened section shall be adjusted in high-yielding and low-yielding formations so as to assure that fresh formation water is sampled. The plan must specify that a well shall not be pumped to dryness if the recharge rate causes the formation water to vigorously cascade down the side of the screen. Refer to page 103 of the TEGD.

4. Samples for analysis of volatiles must be withdrawn at 100 ml/min or less. Aeration as well as agitation must be minimized. Temperature, pH and specific conductance must be rechecked after the samples are taken.

5. Specify how the laboratory will prepare the sample containers. For each metals analysis sample, two polyethylene bottles shall be used so that one bottle may be filtered per page 114 of the TEGD. They shall be acidified in the field per page 111 of the TEGD.

6. Trip blanks shall be handled in the same manner as the samples.

7. Maximum-minimum thermometers shall be placed inside the shipping container. The pH shall be adjusted as per page 114 of the TEGD.

8. The sample containers shall be sealed with "evidence" type tape so that the integrity of the samples cannot be

questioned. The label shall include the sampler's name, not only initials.

9. The field logbook shall contain all the information listed in section 4.4.3 of the TEGD.

10. The chain-of-custody sheet shall include a space for a sample identification number for each container.

11. The sample analysis request sheet must be revised to include the information listed in section 4.4.5 of the TEGD.

12. The groundwater evaluation should establish the contaminant levels at the time of closure for chemicals that may be reasonably associated with the wastes managed at the impoundment. Analysis for all appendix IX constituents must be done unless it can be demonstrated that a particular chemical could not have been in the used solvents or other wastes placed in the impoundments. Analysis must also be done for decomposition products of any waste constituents placed in the impoundments.

    The analytical procedures section must be modified to require the laboratory to at least tentatively identify all major GC/MS peaks found. If a hazardous organic compound is identified, it must be verified. A scan for semi-volatile BNA extractables (method 8270) must likewise be run since these are likely to have been dissolved in the spent solvents. Copies of the mass spectrograms must be attached to the analytical reports to the DHS.

    Analysis of parameters specified in 40 CFR 265.92(b)(1)-(3) as well as total organic carbon and total phosphate must also be performed for all samples.

13. Trip blank - For each sampling episode, one of each type of sample bottle must be filled with Type II reagent grade water and transferred to the sampling site handled like a sample and returned to the laboratory.

14. Equipment blanks must be taken as per page 119 of the TEGD.

15. Procedures for calibration and recalibration of field instruments must be described in detail. Standards used must be certified or traceable.

16. Paragraph 3. on page 2. of the plan must be expanded to describe the decontamination procedures for all non-dedicated equipment such as pH and conductance instruments and steps taken to avoid contamination of the

wells or samples such as providing clean surfaces to place equipment.

17. An explicit presentation of the proposed statistical test methodology should be provided for review. A program of accelerated data collection would be considered along with an appropriate t-test. Refer to pages 129 - 130 of the TEGD.

18. The length of the groundwater monitoring period should be based on the groundwater velocity, horizontal and vertical extent and velocity of soil contamination, location of the monitoring wells, mobility of hazardous waste constituents and other site-specific information.

LOS ANGELES CALIF MAR 24 '88

U.S. POSTAGE 56 :

FROM

STATE OF CALIFORNIA
DEPARTMENT OF HEALTH SERVICES
107 SO. BROADWAY, ROOM B48
LOS ANGELES, CA 90012

Michael Fernandez
EPA Region IX
215 Fremont Street
San Francisco, CA 94105

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY GEORGE DEUKMEJIAN, *Governor*

DEPARTMENT OF HEALTH SERVICES
107 SOUTH BROADWAY, ROOM 7011
LOS ANGELES, CA 90012
(213) 620-2380

December 23, 1987

Mr. Michael Fernandez
Region IX, U.S. EPA
215 Fremont Street
San Francisco, CA 94105

Dear Mr. Fernandez:

WHITTAKER-BERMITE, BURN AREA SAMPLING AND ANALYSIS
EPA I.D. # CAD 064 573 108

This will confirm the telephone discussion between yourself and Alan Sorsher of my staff on Monday, December 7, 1987 regarding the analysis of organic constituents at the Whittaker-Bermite facility in Saugus.

The facility's consultant, Wenck & Associates, had previously requested to limit the analysis of the five organic chemicals listed in the closure plan to one sample per waste management unit in the open burning areas.

It was agreed that if the consultant could furnish an acceptable rationale, 20% of the 172 samples would be randomly selected for analysis. At least six samples from each waste management unit would be analyzed. If any of the constituents were found in the initial 20%, then the remaining samples would also be analyzed for those constituents.

If you have any questions, please contact Alan Sorsher at the above telephone number.

Sincerely,

Harry N. Foot
for John A. Hinton, P.E., Chief
Facility Permitting Unit
Southern California Section
Toxic Substances Control Division

JAH:AS:as

cc: John Harris
Environmental Assessment Unit
Toxic Substances Control Division
P.O. Box 942732
Sacramento, CA 94234-7320

STATE OF CALIFORNIA

Memorandum

To : Angelo J. Bellomo, Chief
Southern California Section
Toxic Substances Control Division
Department of Health Services
107 South Broadway, Room 7011
Los Angeles, CA 90012

Date : September 29, 1987

File : CAD064573108

From : CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD — LOS ANGELES REGION
107 South Broadway, Room 4027, Los Angeles, CA 90012-4596
Telephone: ATSS 640-4460 : (213) 620-4460

Subject: WHITTAKER CORPORATION, BERMITE DIVISION
22116 West Soledad Canyon Road
Saugus, California 91350

Reference is made to our August 24, 1987, memo (copy attached) to John Hinton of your office which transmitted our review comments and recommendations on Whittaker-Bermite's revised closure plan dated April, 1987. These comments and recommendations addressed our concerns on potential ground water contamination which may have resulted from the treatment, storage and disposal units undergoing RCRA closure, and also to satisfy our commitment as required under the Facility Management Plan (FMP).

During a recent FMP update meeting held on September 16, 1987, Regional Board staff were told that the Environmental Protection Agency (EPA) and the Department of Health Services (DHS) required our approval of the facility revised closure plan.

On September 21, 1987, we received documents entitled, "Closure Plan Modification - Whittaker Bermite Proposed by EPA/DHS" for the following RCRA units:

1. Past Burn Pit Areas (2) - Revised September 15, 1987
2. 342 Surface Impoundment - Revised September 17, 1987
3. 317 Surface Impoundment - Revised September 18, 1987
4. East Fork Detonation Range - Revised September 18, 1987
5. Burn Areas, General - Revised September 19, 1987
6. Closure Schedule - Revised September 20, 1987

We have reviewed these documents and concur with the concept of modifying the closure plan. However, we have the following additional comments and recommendations:

DWQ Rec'd

1. On Page 10, Section III- Ground Water Monitoring Plan for 342 and 317 impoundments, Item 1, requires that a minimum of three ground water monitoring wells shall be installed. However, it is not clear whether the minimum requirement of three monitoring wells applies to each surface impoundment or means a total of three wells for both impoundments. In order to satisfy the RCRA regulatory requirements of 40 CFR 265, Subpart F, a minimum of three downgradient monitoring wells must be installed at the edge of each surface impoundment (waste management unit).

2. Although ground water monitoring plan requirement for 342 and 317 impoundments do not require the placement of upgradient (background) monitoring wells, it is our recommendation that as a minimum, one upgradient monitoring well be installed to provide representative samples of ground water in the same zone of the aquifer monitored by the downgradient wells to permit a comparison of ground water quality data as required by 40 CFR 265, Subpart F, 265.92(a)(1) regulations.

3. On Page 6- Schedule of Closure Activities, Item 7 should be modified to "Final Report on Interim Status Ground Water Detection Monitoring Program". Furthermore, if the proposed ground water detection monitoring reveals ground water contamination, a ground water remedial action plan with an implementation time schedule will be required for the agencies' approval.

We are unaware of any formal acceptance or agreement by the company of the closure plan modifications prepared by EPA/DHS. Therefore, approval of the modified closure plan by this Board under Section 13223(a) of the Water Code would be premature at this time, unless the company agrees to incorporate the proposed closure plan modifications and the recommendations made by EPA/DHS, and the Regional Board staff, respectively. Moreover, our approval of the closure plan is contingent upon a concurrent approval by both EPA and DHS. We will take no further action on the plan if either agency fails to approve it by September 30, 1987.

If you have any questions, please have your staff call Larry Peterson or Athar Khan at (213) 620-4460.

Robert P. Ghirelli

ROBERT P. GHIRELLI, D.Env.
Executive Officer

AAk/aak

Attachment

cc: John A. Hinton, Department of Health Services, Toxic Substances Control Division
John J. Adams, Jr., State Water Resources Control Board

A.K.

STATE OF CALIFORNIA

Memorandum

To : John A. Hinton, P.E., Chief
Facility Permitting Unit
Southern California Section
Toxic Substances Control Division
Department of Health Services
107 South Broadway, Room 7011
Los Angeles, CA 90012

Date : August 24, 1987

File : CAD064573108

From : CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD — LOS ANGELES REGION
107 South Broadway, Room 4027, Los Angeles, CA 90012-4596
Telephone: ATSS 640-4460 : (213) 620-4460

Subject: WHITTAKER CORPORATION, BERMITE DIVISION
22116 West Soledad Canyon Road
Saugus, California 91350

Pursuant to the April 8, 1987, Facility Management Plan (FMP) for the subject facility, Regional Water Quality Control Board staff have reviewed the document entitled "Revised RCRA Closure Plan" by Wenck Associates, Inc., dated April 1987. As you know, Whittaker Corporation was directed by EPA (in a letter dated March 3, 1987) to revise their closure plan as a result of the August 26, 1986, Consent Agreement. Although the revised closure plan addresses all of the hazardous waste units at the facility, we have limited our comments to only those units where treatment, storage, or disposal could have resulted in ground water pollution.

1. Page 107 of the Closure Plan, under the heading -- Bermite Division Closure Plan -- state "N/A." In this regard, it is our understanding that even though the wastes, waste residues, and liner/containment system from the former surface impoundments were removed in 1983, the owner/operator (O/O) was still required to close these waste management units in accordance with the applicable regulatory requirements of 40 CFR Part 265, Subpart K (inasmuch as the facility was under a RCRA Interim Status Document). If so, the Closure Plan should provide the details of past removal of standing liquid, waste residues, and liner components, in addition to the method of removal and the quantity of wastes removed from both surface impoundments.

   In view of the above, the O/O should also demonstrate that the applicable requirements for closure/post-closure were met during the "closure" activities.

2. An estimate of maximum inventory of wastes (quantities) either stored or treated during the active life of the impoundments should be provided as per 40 CFR Part 265, Subpart G, Subsection 265.112(a)(2).

3. Closure procedures for the two burn areas and the East Fork Detonation Range areas should be revised to incorporate closure information pursuant to 40 CFR Subpart P - Thermal Treatment regulations.

4. The Closure Plan should address the financial requirements for closure and post-closure maintenance pursuant to 40 CFR Subpart H.

In addition to the ongoing soil characterization and hydrogeological assessment in the vicinity of the two former surface impoundments, investigations should also be made at both the two burn areas and the East Fork Detonation Range, because past disposal/testing activities may have impacted the soil and ground water beneath these units. Our comments on the soil characterization, hydrogeological assessment, and preliminary ground water monitoring plans (which are included in Section IV of the Closure Plan) will be provided at a later date according to the schedule established in the most recent FMP.

Enclosed with this memo is a Completeness Review Checklist for the closure of the former surface impoundments.

If you have any questions concerning this matter, please have a member of your staff contact Athar Khan at ATSS 4460.

HANK H. YACOUB
Supervising Water Resource
Control Engineer

LLP:AAK/llp

Enclosure

cc: Mr. John J. Adams, Jr., State Water Resources Control Board, Division of Water Quality (w/o enclosure)
Mr. Robert S. Ford, State Water Resources Control Board, Division of Water Quality (w/o enclosure)

V. CLOSURE OF SURFACE IMPOUNDMENTS

A. Closure By Waste Removal

A-1e. Removal of Waste Inventory

A-1f. Removal of Waste Residues

REGULATORY REQUIREMENT	EVALUATION CRITERIA	REFERENCES	FINDINGS/COMMENTS
A detailed description of the steps needed to remove or decontaminate all hazardous waste residues and contaminated containment system components, equipment, structures, groundwater, and soils during partial and final closure (§265.112(b)(4)). A description of the methods for removing, transporting, treating, or disposing of all hazardous wastes (including waste residues and materials contaminated with hazardous waste) and identification of and the type(s) of off-site hazardous waste management unit(s) to be used (§265.112(b)(3)).	The closure plan must provide a detailed plan for removal of the following: o Standing liquids; o Waste residues; o Liner containment system components (if applicable); o Leachate and leachate collection system components, and o Contaminated subsoils. The plan should address the following: o Description of any processing of the waste residues (e.g., stabilization prior to removal); o Method of residue and contaminated material removal; o Method of transporting wastes; and o Identification and types of off-site hazardous waste management units. Note: The facility cannot be clean closed (i.e., no post-closure requirements) as long as contaminated soils or groundwater remain.	Not addressed in the Plan.	The closure plan is deficient in providing such information. It is therefore recommended that such information must be provided in the Closure Plan (see comment letter).

Effective
January 12, 1981
and
October 29, 1986

V. CLOSURE OF SURFACE IMPOUNDMENTS
A. Closure By Waste Removal
A-2c. Sampling and Testing to Demonstrate Success of Decontamination

REGULATORY REQUIREMENT	EVALUATION CRITERIA	REFERENCES	FINDINGS/COMMENTS
A description of the methods for sampling and testing surrounding soils and criteria for determining the extent of decontamination (§§265.112(b)(4), 265.228(b)).	The plan also must provide a testing program to determine when the site is clean. The testing program must include: o Sampling procedures, including locations and frequency; o Parameters to be tested for, including a justification of the parameters selected; o Test or analytical procedures to be used (only methods from SW-846 or methods approved under §260.21 are acceptable); and o A detailed discussion of the criteria to be used to evaluate test results in order to determine whether the site is clean. If the waste tested for is a characteristic waste, the site should be cleaned until the sampled materials no longer exhibit the characteristic. If the waste is tested for a listed waste or constituent, the plan should specify the contaminant level at which soils will be considered "clean." In most cases, the level specified will be the background concentration in surrounding, uncontaminated soils. In some instances, "...below the level of detection" will be specified. **Note:** Under §265.112(c)(3), owners/operators of surface impoundments and waste piles who intended to remove all hazardous waste at closure, but were unable to do so (and thus, are required to close the unit as a landfill in accordance with §265.310) must amend the closure plan no later than 30 days after the determination that closure as a landfill is required.	Addressed in soil characterization and Hydrogeological Assessment Plans in Section IV of the Closure Plan.	

Effective
January 12, 1981
and
October 29, 1986

State of California

Memorandum

To : Athar Kahn
Los Angeles Regional Board

Date : JUL 15 1987

Approved By:

Richard D. Humphreys
Engineering Geologist
Division of Water Quality

for Bud Eagle, C.E.G. #530
Sr. Eng. Geologist
Division of Water Quality

From : STATE WATER RESOURCES CONTROL BOARD

Subject: REVIEW OF THE "REVISED RCRA CLOSURE PLAN, BERMITE DIVISION WHITTAKER CORPORATION" SUBMITTED BY WENCK ASSOCIATES INC.

As requested, I have reviewed the report entitled "Revised RCRA Closure Plan, Bermite Division Whittaker Corporation". It is my understanding that only portions of the report concerning the RCRA units were addressed in the Regional Board staff's draft memorandum. It is also my understanding that the Regional Board staff is reviewing the hydrogeologic characterization and ground water monitoring proposal for the facility as it is being implemented by the consultant.

Background

The RCRA units are described as storage buildings, above-ground portable magazines, above-ground treatment tanks, burning area, cages, pans, rails and pits, and a detonation range. These units were used to either store or dispose of, by burning or detonation, explosives, propellants, and flare compounds. The report indicated that about 95% of the RCRA units at this site have been demolished or removed by the owner/operator. Additionally, two surface impoundments that were "closed" in 1983 now serve as foundations for storage buildings 317 and 342.

Comments

1. I concur with the regional Board staff that even though the storage buildings have been demolished, the burn disposal units have been dismantled or covered, and the two surface impoundments were "closed" in 1983, the owner/operator is still obligated to demonstrate that these units were closed in accordance with 40 CFR Part 265. In addition, the closure of buildings 317 and 342, which are founded on the "closed" surface impoundments, will require a closure plan pursuant to 40 CFR 265.

2. Estimates of maximum inventory of waste (quantities) in storage or treatment, during the life of the RCRA units does not appear to have been documented pursuant to 40 CFR 265, Subpart G, subsection 265.112(b)(3).

3. The RCRA units described as portable steel magazines, portable wood magazines, and building 236 were certified clean by a qualified explosives, ordnance, demolition expert. However, the criteria used to determine whether these units were clean was not submitted for review.

4. In Section II of the report entitled "Description of RCRA Units" spillage of hazardous waste at these units is ruled out because of the waste's explosive properties. However, the explosive properties of a compound or mixture does not necessarily preclude it from being spilled. Therefore, an attempt should be made to determine if spillage occurred by reviewing the appropriate records, and if necessary, performing a soil sampling program designed to detect these compounds.

5. The lead azide treatment tanks were treated with water containing "cerric ammonium nitrate" to desensitize residual lead azide. This compound is not listed in the standard reference materials available at the State Library. Therefore, the name of this compound should be clarified.

Conclusions

An attempt should be made to evaluate the documentation available for the dismantled RCRA units to determine if the method of closure:

a. Minimizes the need for further maintenance.

b. Controls, minimizes or eliminates to the extent necessary to prevent threats to human health and the environment, post closure escape of hazardous wastes to ground or surface waters, pursuant to 40 CFR 265.111 (a) and (b).

The proposed soil characterization and hydrological assessment of the two "closed" surface impoundments have apparently not been formally approved, yet work is underway. Therefore, the owner/operator should be aware that he is performing this work at his own risk.

Lastly, residues from thermal destruction of explosives at the burn and detonation areas could possibly contaminate soil and ground water. Therefore, a soil and hydrological assessment program should be considered for these areas.

If you have any questions, please call me at ATSS 492-3585.

cc: John Adams

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES
107 SOUTH BROADWAY, ROOM 8-45 7011
LOS ANGELES, CA 90012
(213) 620-2380

February 10, 1987

Mr. Norman C. Wenck, P.E.
Wenck Associates, Inc.
832 Twelve Oaks Center
15500 Wayzata Blvd.
Wayzata, MN 55391

Dear Mr. Wenck:

WHITTAKER-BERMITE, SAUGUS FACILITY, CAD 064573108, GENERAL CLOSURE PLAN AMENDED AUGUST 1, 1986

We have reviewed the closure plan for the following hazardous waste management units:

1) DRY (P.E.P.) CONTAMINATED COMBUSTIBLE - building 223

2) LEAD AZIDE WASTE PROCESSING - building 207

3) PORTABLE STORAGE (P.E.P.) MAGAZINES - 502, 504, 506

4) STORAGE (P.E.P.) - building 236

5) PORTABLE P.E.P. STORAGE (3 EACH)

6) BURNING CAGE, PANS AND RAILS

7) TWO BURN PITS IN BURNING RANGE AREA

8) EAST FORK DEMOLITION AREA

We find the plan lacking in detail and only defiencies of a general nature can be discussed.

Attached is a list of general defiencies and comments which should be addressed in the closure plan.

In order to assist you in preparing an acceptable plan, we are enclosing a copy of part of the Draft Checklist and Protocol for Evaluating the Quality of Interim Status Closure/Post-Closure Plans.

Once a more detailed plan is submitted, it will then be possible to focus on any specific items requiring clarification.

If you have any questions, please contact Alan Sorsher at the above telephone number.

Sincerely,

John A. Hinton, P.E., Chief
Facility Permitting Unit
Southern California Section
Toxic Substances Control Division

JAH:AS:as

cc: Athar Kahn, RWQCB
Debbie Robinson, EPA
Al Storm, DHS, Hq
Hossein Nasseri, DHS, LA
Tony Catanese, DHS, LA
Lily Wong, EPA
Seldon Prentice, EPA
Stephen C. Jones, Jones, Day, Reavis & Pogue
A. L. Simmons, Whittaker Corp.

enclosure

NOTICE OF DEFICIENCIES

WHITTAKER-BERMITE GENERAL CLOSURE PLAN
CAD 064573108

1. In order to evaluate the adequacy of the closure plan for each specific hazardous waste management unit, the section of the plan for that unit should provide a clear explanation of the activities of the unit including its history, the specific chemicals handled there and their characteristics such as solubility in solvents such as steam, water, or organic solvents.

2. The size and other physical characteristics of each particular unit should be discussed.

3. Washwaters generated in the decontamination of hazardous wastes are themselves hazardous wastes and must be managed as such.

4. For each waste management unit, the closure plan must specify criteria to be used to determine when decontamination is complete. This should include a sampling plan specifying a minimum number of samples, the type of samples, and the specific chemical analysis to be used.

5. No details were given as to how the closure cost estimates were arrived at. The closure plan must be sufficiently detailed so that a fairly accurate closure cost estimate may be calculated. The facility must provide financial assurance for closure and post-closure, if necessary.

6. A post-closure plan, groundwater monitoring and deed restriction will be required for any waste management unit which involves the disposal of hazardous waste or hazardous waste residues in the ground.

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

CAD 064 573 108

GEORGE DEUKMEJIAN, *Governor*

DEPARTMENT OF HEALTH SERVICES
107 SOUTH BROADWAY, ROOM ~~8-48~~ 7011
LOS ANGELES, CA 90012
(213) 620-2380

IID

February 4, 1987

Ms. Lily Wong
Toxics and Waste Management Division
U.S. Environmental Protection Agency
Region IX
215 Fremont Street
San Francisco, CA 94105

Dear Ms. Wong:

GENERAL CLOSURE PLAN FOR WHITTAKER-BERMITE SAUGUS FACILITY

Enclosed is a copy of our proposed cover letter and NOD for the closure of the above facility. Per the FMP, we must have your comments and approval before we can send it out to the facility.

If you have any questions, please contact Alan Sorsher at the above telephone number.

Sincerely,

Joe Kan for

John A. Hinton, P.E., Chief
Facility Permitting Unit
Southern California Section
Toxic Substances Control Division

JAH:AS:as

cc: Athar Kahn, RWQCB
Ray Seid, EPA
Al Storm, DHS, HQ
Hossein Nasseri, DHS, LA
Tony Catanese, DHS, LA

enclosure

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

GEORGE DEUKMEJIAN, *Governor*

DEPARTMENT OF HEALTH SERVICES
107 SOUTH BROADWAY, ROOM B-7011
LOS ANGELES, CA 90012
(213) 620-2380

February , 1987

Mr. Norman C. Wenck, P.E.
Wenck Associates, Inc.
832 Twelve Oaks Center
15500 Wayzata Blvd.
Wayzata, MN 55391

Dear Mr. Wenck:

WHITTAKER-BERMITE, SAUGUS FACILITY, GENERAL CLOSURE PLAN AMENDED AUGUST 1, 1986

We have reviewed the closure plan for the above facility and find it so vague and unclear that only defiencies of a general nature can be discussed.

Attached is a list of general defiencies and comments which should be addressed in the closure plan.

In order to assist you in preparing an acceptable plan, we are enclosing a copy of part of the Draft Checklist and Protocol for Evaluating the Quality of Interim Status Closure/Post-Closure Plans, July 31, 1985.

Once a more detailed plan is submitted, it will then be possible to focus on any specific items requiring clarification.

If you have any questions, please contact Alan Sorsher at the above telephone number.

Sincerely,

John A. Hinton, P.E., Chief
Facility Permitting Unit
Southern California Section
Toxic Substances Control Division

JAH:AS:as

cc: Athar Kahn, RWQCB
Ray Seid, EPA
Al Storm, DHS, Hq
Hossein Nasseri, DHS, LA
Tony Catanese, DHS, LA

enclosure

NOTICE OF DEFICIENCIES

WHITTAKER-BERMITE GENERAL CLOSURE PLAN

1. In order to evaluate the adequacy of the closure plan for each specific hazardous waste management unit, the section of the plan for that unit should provide a clear explanation of the activities of the unit including its history, the specific chemicals handled there and their charactistics such as solubility in solvents such as steam, water, or organic solvents.

2. The size and other physical characteristics of each particular unit should be discussed.

3. Washwaters generated in the decontamination of hazardous wastes are themselves hazardous wastes and must be managed as such.

4. For each waste management unit, the closure plan must specify criteria to be used to determime when decontamination is complete. This should include a sampling plan specifying a minimum number of samples, the type of samples, and the specific chemical analysis to be used.

5. No details were given as to how the closure cost estimates were arrived at. The closure plan must be sufficiently detailed so that a fairly accurate closure cost estimate may be calculated. The facility must provide financial assurance for closure and post-closure, if necessary.

6. A post-closure plan, groundwater monitoring and deed restriction will be required for any waste management unit which involves the disposal of hazardous waste or hazardous waste residues in the ground.

IC

RECORD OF COMMUNICATION	☒ PHONE CALL ☐ DISCUSSION ☐ FIELD TRIP ☐ CONFERENCE ☐ OTHER (SPECIFY) (Record of item checked above)	
TO: Alan Sorsher DHS-SCS (213)620-2380	FROM: Deborah Robinson T-2-2	DATE 2/9/87 TIME 1:30pm

SUBJECT Whittaker Bermite closure plan NOD CAD 064573108

SUMMARY OF COMMUNICATION

DHS sent a draft closure plan NOD to EPA for the TCBD area (no known land disposal units). The letter transmitting the draft NOD is dated 2/4/87, + requests EPA approval. A separate closure plan is being prepared for the surface impoundment.

I told Alan that EPA would not invest a lot of effort in the TCBD area closure because it does not contain known land disposal units. I said that the NOD was fine + suggested two minor changes:

1) Specify that the plan addresses only the TCBD area
2) Include the facility's EPA ID # in correspondence.

CONCLUSIONS, ACTION TAKEN OR REQUIRED

This serves as a record of EPA's comments on the draft NOD.

INFORMATION COPIES TO: Wong, file, Sorsher, Breitlow

EPA Form 1300-6 (7-72) REPLACES EPA HQ FORM 5300-3 WHICH MAY BE USED UNTIL SUPPLY IS EXHAUSTED.

South Coast
AIR QUALITY MANAGEMENT DISTRICT
9150 FLAIR DRIVE, EL MONTE, CA 91731 (818) 572-6200

INFORMATION REQUIRED FOR RULE 1150 EXCAVATION MANAGEMENT PLANS INVOLVING LANDFILL EXCAVATIONS

1. A contour map showing the location of the landfill, the proposed excavation area and the surrounding area up to 2,500 feet away from the perimeter of the proposed excavation area. The map should identify all land uses in the area and highlight areas of high population such as schools, residential areas, restaurants and shopping centers.

2. The total amount of material to be excavated and the landfill to which the excavated material will be hauled.

3. A list of materials buried or suspected materials buried in the landfill based on all available records.

4. Results of any boring tests done to characterize the landfill including the identification of any EPA priority pollutants.

5. Results of any landfill gas analyses including the concentrations of methane and any speciated non-methane organics such as vinyl chloride.

6. A detailed description of how the excavation will be accomplished.

7. A detailed description of the mitigation measures to be implemented during the excavation and transportation phases of the project to minimize potential emissions. The excavation phase includes periods of inactivity such as lunch breaks, nights, weekends and holidays. Mitigation measures should be identified for both hazardous and non-hazardous materials.

8. A detailed description of any monitoring to be conducted during the excavation. Both work face, property line and ambient air monitoring should be addressed.

9. An estimate of the emissions which will occur during the excavation including the emissions from the vehicular sources.

10. A provision that the excavation activities will cease immediately when the operator is notified by a District employee that a public nuisance has occurred as required by Rule 1150(b)(3).

(Adopted October 15, 1982)

RULE 1150. EXCAVATION OF LANDFILL SITES

(a) Definitions

For the purpose of this rule:

(1) A Landfill is a place, location, tract of land, area, or premises in use, or which has been used for the disposal of waste.

(2) An Active Landfill is a landfill that has received and/or processed waste within the preceding two years.

(3) An Inactive Landfill is a landfill that has not received and/or processed waste within the preceding two years.

(4) Operator is the legal owner of a landfill or a person authorized by the legal owner to operate the landfill or to perform excavation activities at the landfill.

(5) Excavation means any activity which exposes buried waste to the atmosphere except for activities which are a normal part of the daily operation of an active landfill.

(b) Requirements

(1) The operator of a landfill is subject to the provisions of this rule.

(2) No person shall initiate excavation of an active or inactive landfill without an Excavation Management Plan approved by the Executive Officer. The Plan shall, as a minimum, provide information regarding the quantity and characteristics of the material to be excavated and transported, and shall identify mitigation measures to be activated as necessary during excavation to ensure that a public nuisance condition does not occur. Mitigation measures shall be selected after consideration of the physical characteristics of the landfill. Such mitigation measures may include gas collection and disposal, baling, encapsulation, covering of the material, chemical neutralizing, or other measures approved by the Executive Officer.

(3) The Executive Officer shall not approve any Excavation Management Plan unless such Plan includes a provision for immediate cessation of excavation activities when the operator is notified by the Executive Officer that a public nuisance has occurred. Upon determination by the Executive Officer that a public nuisance has occurred, those mitigation measures identified in the Plan shall be implemented immediately, as well as any additional mitigation measures which the Executive Officer deems appropritate.

(4) As part of his evaluation of an Excavation Management Plan, the Executive Officer may consult with public health agencies in evaluating potential health effects. When the results of such consultations so warrant, ambient air monitoring equipment requirements may be specified as a condition of Plan approval.

(5) Compliance with the provisions of this rule does not exempt a person from complying with the requirements of Rule 402, Nuisance;

California Health and Safety Code Section 41700; or other applicable codes, rules, and regulations.

(6) The District shall respond within 30 days to the applicant as to whether a submitted Plan is complete or incomplete. If additional review time is needed by the District, the applicant will be so informed within the same 30-day period.

(c) Exemptions

(1) The drilling of holes up to 24 inches in diameter for geological evaluation or for telephone or power transmission poles or their footings.

(2) The drilling of oil wells, gas wells, or landfill gas collection wells or the maintenance of gas or leachate collection systems shall not require submittal of an Excavation Management Plan. Permit requirements to construct/operate equipment at a landfill remain, and are not affected by requirements for an Excavation Management Plan.

(3) Emergency excavation performed by, under the jurisdiction of, or pursuant to the requirements of, an authorized Health Officer, Agricultural Commissioner, or Fire Protection Officer. Whenever possible, the Executive Officer shall be notified prior to commencing such excavation.

(4) The Executive Officer may exempt from the requirements of this rule any excavation activities which he determines pose an insignificant risk of violating Health and Safety Code Section 41700.

(d) Fees

For the purpose of determining the appropriate processing fees only, the filing of an Excavation Management Plan shall be considered the equivalent of filing an application for a permit. The person submitting the Plan shall be assessed a filing fee as described in Rule 301(a), an engineering evaluation fee and operating fee as described in Rule 301(b) and 301(e) - Schedule 5, and where applicable, Rule 301(f) and Rule 304. The fees shall be due and payable as described in those rules.

(e) Effective Dates

The provisions of this rule shall be effective for any landfill site excavation begun after January 1, 1983.

TABLE I

UNIT RISK FACTORS FOR ANALYSIS OF INHALATION EXPOSURE AND POTENCY SLOPES FOR INGESTION EXPOSURE[a]

Substance	CAS Number	Unit Risk Factor[b,c] $(ug/m^3)^{-1}$ and Weight of Evidence[d]
Acrylonitrile	107-13-1	6.8×10^{-5} [B1]
Allyl Chloride	107-05-1	5.9×10^{-6} [B2]
Arsenic	7440-38-2	4.3×10^{-3} [A]
Asbestos	1332-21-4	190×10^{-6} per 0.0001 fibers/cm^3 [A][e]
Benzene	71-43-2	5.3×10^{-5} [A]
Benzidene	92-87-5	6.7×10^{-2} [A]
Benzo(a)Pyrene	50-32-8	1.7×10^{-3} [B2]
Beryllium	7440-41-7	2.4×10^{-3} [B2][f]
Bis(2-chloro-ethyl)ether	111-44-4	3.3×10^{-4} [B2]
Bis(chloro-methyl)ether	542-88-1	2.7×10^{-2} [A]
1,3-Butadiene	106-99-0	6.7×10^{-5} [B2]
Cadmium	7440-43-9	1.2×10^{-2} [B1]
Carbon tetrachloride	56-23-5	4.2×10^{-5} [B2]
Chlorinated dioxins and dibenzofurans (TCDD equivalent)[g]		38 [B2]

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TABLE I
(continued)

Substance	CAS Number	Unit Risk Factor[b,c] $(ug/m^3)^{-1}$ and Weight of Evidence[d]
Chlorinated ethanes: 1,2-Dichloro-ethane (Ethylene dichloride)	107-06-2	2.2×10^{-5} [B2]
Chloroform	67-66-3	2.3×10^{-5} [B2]
Chromium, hexavalent	7440-47-3	1.5×10^{-1} [A]
Dichloro-benzidene	91-94-1	4.8×10^{-4} [B2]
2,4-Dinitro-toluene	121-14-2	1.9×10^{-4} [B2]
Diphenyl-hydrazine	122-66-7	2.2×10^{-4} [B2]
Ethylene dibromide	106-93-4	7.2×10^{-5} [B2]
Ethylene dichloride	107-06-2	2.2×10^{-5} [B2]
Epichloro-hydrin	106-89-8	1.2×10^{-6} [B2]
Ethylene Oxide	75-21-8	1.0×10^{-4} [B1]
Formaldehyde	50-00-0	1.3×10^{-5} [B1]
Hexachloro-benzene	118-74-1	4.9×10^{-4} [B2]

TABLE I
(continued)

Substance	CAS Number	Unit Risk Factor[b,c] $(ug/m^3)^{-1}$ and Weight of Evidence[d]
Hexachloro-cyclohexane:		
technical grade	- - -	5.7×10^{-4} [B2]
alpha isomer	319-84-6	7.6×10^{-4} [B2]
beta-isomer	319-85-7	5.3×10^{-4} [B2]
Methylene chloride	75-09-2	4.1×10^{-6} [B2]
Nickel:		
refinery dust	- - -	2.4×10^{-4} [A]
subsulfide	0120-35-722	4.8×10^{-4} [A]
Nitrosamines:		
Dimethyl-nitrosamine	62-75-9	1.4×10^{-2} [B2]
Diethyl-nitrosamine	55-18-5	4.3×10^{-2} [B2]
Dibutyl-nitrosamine	924-16-3	1.6×10^{-3} [B2]
Phenols:		
2,4,6-Tri-chlorophenol	88-06-2	5.7×10^{-6} [B2]
Polychlorinated biphenyls	1336-36-3	1.2×10^{-3} [B2]
Trichloro-ethylene	79-01-6	1.3×10^{-6} [B2]
Vinyl chloride	75-01-4	2.7×10^{-6} [A]

TABLE 2. EMISSION RELEASE TYPES

Emission Release Type #	Description of Release Characteristics
1.	Emissions exhaust directly into the open air (not inside a building) within 5 feet of ground level.
2.	Emissions exhausts through one or more vents or stacks on the roof of a building 13 feet above ground (emittant is assumed to be entrained in the building wake and receptors are immediately downwind of the building).
3.	Same as Type 2 for a 25' stack.
4.	Emission exhaust through one or more stacks; stack height is 50' and at least two and one half times the height of the surrounding buildings or the building from which the stack emerges; flow rate is 1.6 ACFM or greater and the exhaust temperature is ambient or greater; there are no covers on the stacks which would interfere with vertical flow of the exhaust.

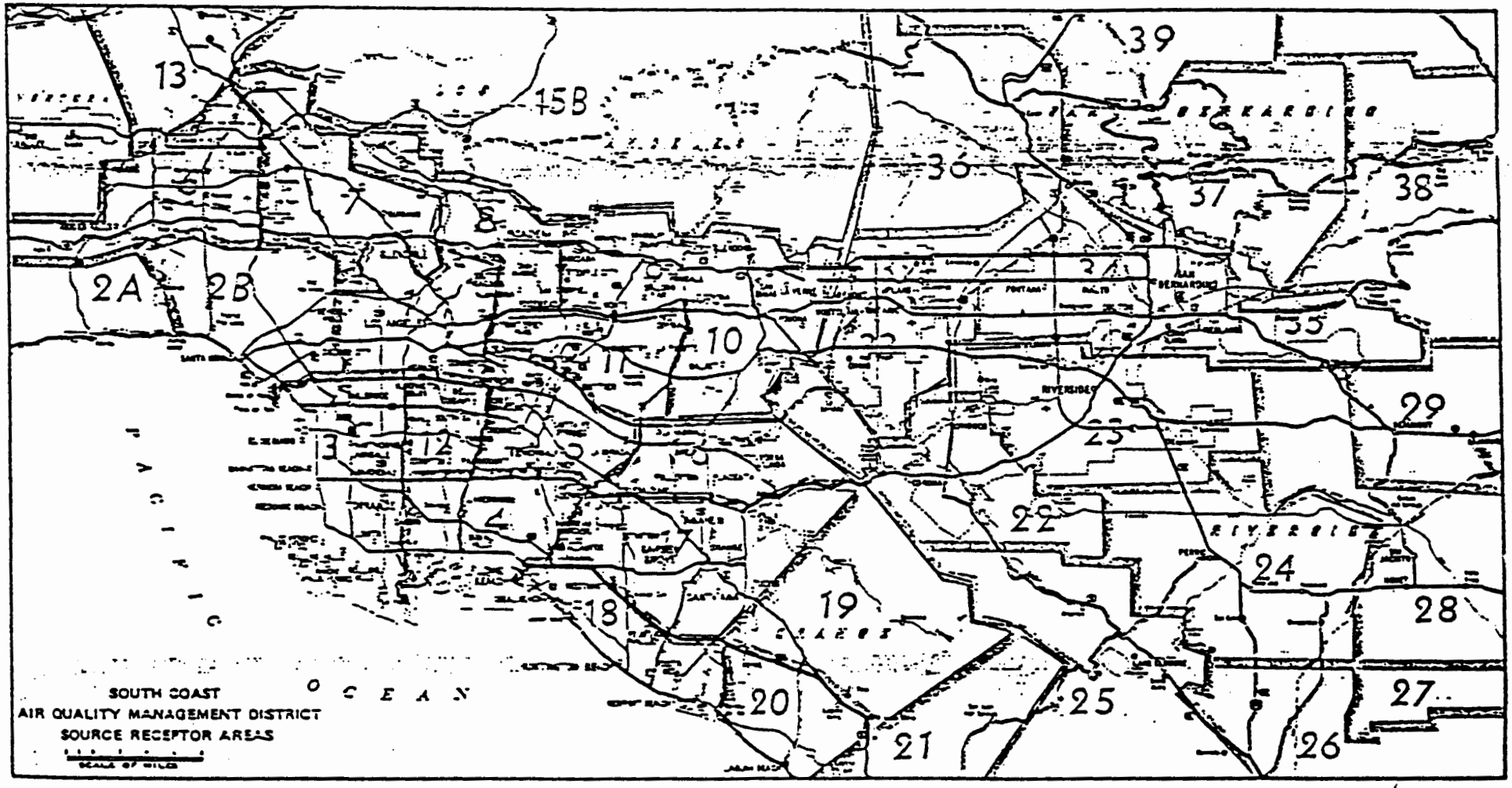
Table 3
SCREENING ALLOWABLE ANNUAL CARCINOGENIC SOURCE STRENGTH
(m^3 per second)
OPERATING PERIOD, 24 HOURS PER DAY

District Region	District Source Receptor Area	Emission Release Type 1	2	3	4
San Fernando Valley	6 & 7	0.0042	0.0055	0.0068	0.0194
San Gabriel Valley	8 & 9	0.0034	0.0045	0.0058	0.0188
Coastal L.A. County	2, 3, & 4	0.0031	0.0038	0.0046	0.0111
Cent. & So. L.A. County	1, 5, & 12	0.0032	0.0041	0.0050	0.0146
East L.A. Co. & Puente Hills	10, 11, & 16	0.0038	0.0050	0.0064	0.0188
Orange County	17, 18, 19, & 20	0.0043	0.0056	0.0070	0.0196
San Bernadino County	32, 34, & 35	0.0017	0.0023	0.0029	0.0128
Riverside County	22, 23, 24, & 25	0.0040	0.0049	0.0058	0.0148
Other Areas not listed		0.0017	0.0023	0.0029	0.0128

Table 4
SCREENING ALLOWABLE ANNUAL CARCINOGENIC SOURCE STRENGTH
(m^3 per second)
OPERATING PERIOD, 8 DAYTIME HOURS

District Region	District Source Receptor Area	Emission Release Type 1	2	3	4
San Fernando Valley	6 & 7	0.0083	0.0085	0.0090	0.0124
San Gabriel Valley	8 & 9	0.0081	0.0083	0.0088	0.0119
Coastal L.A. County	2, 3, & 4	0.0072	0.0074	0.0078	0.0105
Cent. & So. L.A. County	1, 5, & 12	0.0094	0.0096	0.0102	0.0141
East L.A. Co. & Puente Hills	10, 11, & 16	0.0081	0.0083	0.0089	0.0124
Orange County	17, 18, 19, & 20	0.0083	0.0084	0.0089	0.0120
San Bernadino County	32, 34, & 35	0.0078	0.0079	0.0084	0.0115
Riverside County	22, 23, 24, & 25	0.0086	0.0088	0.0094	0.0130
Other areas not listed		0.0078	0.0079	0.0084	0.0115

Figure 2
Source Receptor Areas



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EXAMPLE

SCREENING ANALYSIS FOR ROUTINE SOURCES* OF CARCINOGENIC AIR POLLUTANTS
Inhalation Pathway Only

1. Calculate "Carcinogenic Source Strength" (CSS) and sum for each Pollutant

Emittant Name	Emission Rate (kilograms/ year)		Unit Risk Factor		Conversion Factor		CSS**
		X		X	31.7	=	
		X		X	31.7	=	
		X		X	31.7	=	
		X		X	31.7	=	
					Total		_____

2. Determine Emission Release Type of the Source from Table 1

Emission Release Type # = _____

3. Determine the District Source-Receptor Area (as defined in District Rule VII) of the proposed source location

4. If the CSS calculated in Step 1 is less than or equal to the allowable values listed in Table 2 or 3 the source will not create a maximum individual cancer risk greater than one per million. If the CSS calculated in Step 1 is less than or equal to ten times the values listed in the table the source will not create a maximum individual cancer risk greater than ten per million.

* This screening analysis can be used where:
- o the source is located in flat or gently rolling terrain
- o the source is located in a primarily urban area
- o the emissions and release characteristics are fairly uniform diurnally and seasonally

** Units Are: (Cancer Cases/person) (m^3/sec)

Rec'd 5/13/86

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES
107 SOUTH BROADWAY, ROOM 7011
LOS ANGELES, CA 90012
(213) 620-2380

HAZARDOUS WASTE MANAGEMENT DIVISION
MAY 02 1986
CALIFORNIA DEPARTMENT OF HEALTH SERVICES, SACRAMENTO

April 28, 1986

Lily Wong
U.S. Environmental Protection Agency
Region IX
215 Fremont Street
San Francisco, CA 94105

Dear Ms. Wong:

INADEQUATE CLOSURE OF POND 317 AT WHITTAKER CORPORATION BERMITE DIVISION CAD 064573108

Our review of the reports of closure activities submitted by Bermite Division relative to its Pond 317 indicates that the characterization of the underlying soil is inadequate to show whether or not that soil is contaminated with hazardous waste.

We recommend you call for further characterization of the soil from the surface to a minimum depth of ten feet below the elevation of the former pond liner. Samples should be refrigerated to retain volatile constituents and analyzed for at least methylene chloride and isopropyl alcohol and similar compounds.

Our review of the wastes managed and the closure activities reported relating to Pond 342 indicates there is no significant degradation of the environment from that source, and we believe it was adequately closed.

If you have any questions please call Roy Thielking of this office.

Sincerely,

Harry Sneh, Program Manager
Facility Permitting Unit
Southern California Section
Toxic Substances Control Division

HS:RT:tg

cc: John Masterman
Toxic Substances Control Division
714 "P" Street
Sacramento, CA 95814

Robert Ghirelli
RWQCB
107 S. Broadway Room 4027
Los Angeles, CA 90012

CEI

ANNUAL RCRA GROUNDWATER MONITORING INSPECTION AND EVALUATION REPORT REGIONAL WATER QUALITY CONTROL BOARD LOS ANGELES REGION

FACILITY: Bermite Division
Whittaker Corporation
22116 West Soledad Road, Saugus

EPA ID NO.: CAD064573108

DATE OF INSPECTION: August 7, 1985

FACILITY REPRESENTATIVES: Mr. Thomas J. Bloom, Director
Environmental Affairs
Mr. Glen AbdunNur, Maintenance Superintendent

RWQCB and SWRCB INSPECTORS: Charley Fisher (State Board)
Athar Khan

I. PURPOSE:

This report summarizes the annual RCRA inspection at Bermite Division of Whittaker Corporation, located in Saugus, Los Angeles County. Regional Board staff has included this facility in its F.Y. 1985-86 RCRA facility list in order to determine whether or not a groundwater monitoring program is necessary. Facility inspection and an on-site well sampling was conducted by State and Regional Board staff on August 7, 1985.

II. INTRODUCTION AND SITE HYDROGEOLOGY:

Bermite Division of Whittaker Corporation manufactures rocket motors for the Sidewinder and other missile systems. Other activities include research and development of high energy fuels, and production of missile boosters, gas generators and igniters. Wastewater is generated as a result of processing red phosphorus and is discharged to an above-ground tank system consisting of one tank of 11,000-gallon capacity and two tanks of 32,000-gallon capacity. The tanks are cleaned 2-3 times a year and waste is hauled to a legal disposal site.

Soils exposed on the ground surface are silty sand and clayey sand and are in a loose to dense condition. The eastern Santa Clara River Basin lies directly north of the site. The Saugus formation and quarternary alluvium are the principle sources of groundwater. The Saugus formation consists of up to 2500 feet of continental sand, clay, and poorly cemented gravel of Plio-Pleistocene age. Beneath valley areas, the Saugus formation is overlain by up to 100 feet of alluvial sand and gravel with some clay and silt. Groundwater depth in the area generally ranges from 70 to 80 feet. Groundwater gradient in this area is generally towards the southwest.

III. OVERVIEW AND EVALUATION

The ISD issued on September 25, 1981, does not contain groundwater monitoring requirements. Prior to the above-ground storage system, the company disposed of their phosphorus processing wastewater to a surface impoundment located in the southwest area of the site. A closure plan for the surface impoundment was submitted by the company to DOHS. A closure plan for the surface impoundment was submitted by the company to DOHS on September 9, 1983, pursuant to 40CFR265.228 subpart G regulations. Soil test results from samples obtained from beneath the surface impoundment area showed no evidence of any contamination.

The surface impoundment was removed from operation by November 1, 1983. No groundwater monitoring system at the facility is required for current ISD compliance. There is a production well located at the north edge of the facility which is mainly used for fire protection purposes. SWRCB, Division of Water Quality conducted an overall groundwater quality survey of the area around Bermite facility. In these regards, the Bermite onsite well was sampled by SWRCB staff and analyses results disclosed the presence of 1, 1 dichloroethylene, Freon 113, carbon tetrachloride, chloroform, and trichloroethylene (see table below). A follow-up sampling for the organic parameters was conducted on August 7,* 1985 by State and Regional Board staff. After reviewing the results of this second sampling, the history of the company's past disposal practices, and the hydrogeological conditions beneath the site, the need for any groundwater monitoring will be determined by the Regional Board staff. Appropriate recommendations will then be submitted to DOHS.

Date of Sampling: May 1985 *August 85

Contaminant	Level Detected (ppb)		DOES Action Level (ppb)
1,1-dichloroethylene	1.5	2.1	Limit of quantification 0.1 - 0.4
Freon 113 (1,1,2-trichloro-1,2,2-trifluoroethane)	Not quantified	Not quan.	———
Chloroform	0.5	0.60	———
Carbon tetrachloride	0.81	0.54	5.0
Trichloroethylene	0.58	0.66	5.0

[1] Analysis performed

A. EPA Method 624 (For Volatile Organics)

B. EPA Method 625

C. Drinking Water Metals

* See attached page for Bermite

205j GROUND WATER HOTSPOTS STUDY
ANALYTICAL RESULTS FOR GROUND WATER SAMPLING IN
REGION 4--SEPTEMBER 12, 1985

SITE	TOTAL # OF WELLS	# OF WELLS CONTAM-INATED	WELL NO.	CHEMICALS FOUND	CONCENTRATION (ppb) 1ST SAMPLE 5/85	2ND SAMPLE 8/85	DHS ACTION LEVEL	EPA MCL
A. Saugus/Newhall	6	4	1.	*1,1-dichloroethylene	*1.2		0.1-0.4	
				1,1-dichloroethane	.75	a	---	---
				1,1,1-trichloroethane	84.0		200.0	
		Bermite Well →	2.	*1,1-dichloroethylene	*1.5	*1.8-2.1	0.1-0.4	
				carbon tetrachloride	.81	.50-.54	5.0	
				chloroform	.50	.57-.60	---	100
				trichloroethylene (TCE)	.58	.61-.66	5.0	
				1,1,2-trichloro-2,2,1-trifluoroethane (Freon 113)	not quantified			
			3.	Barium	150.0	b	1000.0	
			6.	*1,1-dichloroethylene	*.90		0.1-0.4	
				1,1,1-trichloroethane	45-46		200.0	
				trans-1,2-dichloroethylene	.90		---	---
				trichloroethylene (TCE)	.40		5.0	
				Barium	12.0		1000.0	
				Cadmium	4.0	b	10.0	
B. Vernon/Norwalk/ Santa Fe Springs	5	3	1.	Chromium	14.0	b	50.0	
			3.	*Selenium	*20.0	*16.0	---	10
				Chromium	12.0	12.0	50.0	
				Barium		100.0	1000.0	
			5.	trichloroethylene (TCE)	1.9	.84-.92	5.0	

*Exceeds DHS Action Levels or EPA MCL's.
a This well was not available for resampling on 8/6/85 due to mechanical problems.
b Wells were not resampled for heavy metals contamination other than Selenium.
c Wells were not resampled for Nitrate-N contamination.

APPENDIX A-1

FACILITY INSPECTION FORM FOR COMPLIANCE WITH INTERIM STATUS STANDARDS COVERING GROUND-WATER MONITORING

Company Name: Whittaker Corporation Bermite Division ; EPA I.D. Number: CAD064573108

Company Address: 22116 West Soledad Road Saugus ; Inspector's Name: Athar Khan

Company Contact/Official: Thomas Bloom ; Branch/Organization: Environmental

Title: Environmental Affair Director ; Date of Inspection: August 7, 1985

	Yes	No	Unknown	Waived
Type of facility: (check appropriately)				
a) surface impoundment		x		
b) landfill		x		
c) land treatment facility		x		
d) disposal waste pile*		x		
Ground-Water Monitoring Program				
1. Was the ground-water monitoring program reviewed prior to site visit? If "No",		x		
a) Was the ground-water program reviewed at the facility prior to site inspection?		x		
2. Has a ground-water monitoring program (capable of determining the facility's impact on the quality of groundwater in the uppermost aquifer underlying the facility) been implemented? 265.90(a)		x(1)		

*Listed separate from landfill for convenience of identification.

(1) RCRA groundwater monitoring program requirements were not included in the ISD, therefore such a program was not developed by the company. A surface impoundment at the facility was replaced by an above-ground tank system. A closure plan pursuant to 40CFR 265.228 Subpart G was filed by the company at DOHS in September 1983. Regional Board is investigating whether or not a groundwater monitoring program is necessary for this facility. RCRA regulations contained in 40CFR265.90 are not applicable, and the remaining of the pages of this form are not filled out.

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES
107 SOUTH BROADWAY, ROOM 7011
LOS ANGELES, CA 90012
(213) 620-2380

HAZARDOUS WASTE MANAGEMENT SECTION
MAY 02 1986
CALIFORNIA DEPARTMENT OF HEALTH SERVICES, SACRAMENTO

April 28, 1986

Lily Wong
U.S. Environmental Protection Agency
Region IX
215 Fremont Street
San Francisco, CA 94105

Dear Ms. Wong:

INADEQUATE CLOSURE OF POND 317 AT WHITTAKER CORPORATION BERMITE DIVISION CAD 064573108

Our review of the reports of closure activities submitted by Bermite Division relative to its Pond 317 indicates that the characterization of the underlying soil is inadequate to show whether or not that soil is contaminated with hazardous waste.

We recommend you call for further characterization of the soil from the surface to a minimum depth of ten feet below the elevation of the former pond liner. Samples should be refrigerated to retain volatile constituents and analyzed for at least methylene chloride and isopropyl alcohol and similar compounds.

Our review of the wastes managed and the closure activities reported relating to Pond 342 indicates there is no significant degradation of the environment from that source, and we believe it was adequately closed.

If you have any questions please call Roy Thielking of this office.

Sincerely,

Harry Sneh, Program Manager
Facility Permitting Unit
Southern California Section
Toxic Substances Control Division

HS:RT:tg

cc: John Masterman
Toxic Substances Control Division
714 "P" Street
Sacramento, CA 95814

Robert Ghirelli
RWQCB
107 S. Broadway Room 4027
Los Angeles, CA 90012

S: f California

California Reg l Water Quality Control Board
Los Angeles Region

LC
cc:SA

Memorandum

To : Mr. John Adams
SWRCB, Division of Water Quality
P.O. Box 100
Sacramento, CA 95801-0100

Date: June 20, 1985

File : 120-RCRA

From : Los Angeles Region

Subject: RCRA FACILITY ANNUAL COMPLIANCE INSPECTION AND EVALUATION REPORTS

Pursuant to the State Board's memorandum dated February 21, 1985, attached are the inspection reports for the following RCRA facilities:

1. Bermite Division
   Whittaker Corporation
   CAD064573108

2. Talley Corporation
   CAD008383127

We plan to complete all remaining facility inspections and reports according to the schedule discussed in our March 21, 1985, meeting.

Any questions regarding the attached reports should be directed to me, Mr. Athar Khan or to Mr. Frank Mele at ATSS 640-4460.

Raymond K Delacourt

RAYMOND K. DELACOURT
Senior Water Resource
Control Engineer

AK/pl

Received
JUN 24 1985

ANNUAL RCRA GROUNDWATER MONITORING
INSPECTION AND EVALUATION REPORT
REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION

FACILITY: Bermite Division
Whittaker Corporation
22116 West Soledad Road, Saugus

EPA ID NO.: CAD064573108

DATE OF INSPECTION: May 10, 1985

FACILITY REPRESENTATIVES: Mr. Thomas J. Bloom
Mr. John Pierson

RWQCB INSPECTOR: Athar Khan

I. PURPOSE:

This report summarizes the annual ISD groundwater compliance evaluation at Bermite Division of Whittaker Corporation, located in Saugus. Compliance is evaluated by review of the facility's Interim Status Document (ISD), file review, discussions with State Department of Health Services (DOHS), and a site inspection by Regional Board's staff on May 10, 1985.

II. INTRODUCTION AND SITE HYDROGEOLOGY:

Bermite Division of Whittaker Corporation manufactures rocket motors for the Sidewinder and other missile systems. Other activities include research and development of high energy fuels, and production of missile boosters, gas generators and igniters. Wastewater is generated as a result of processing red phosporus, and is discharged to an above-ground tank system consisting of one tank of 11,000 gallon capacity and two tanks of 32,000 gallon capacity. The tanks are cleaned 2-3 times a year and waste is hauled to a legal disposal site.

Soils exposed on the ground surface are silty sand and clayey sand and are in a loose to dense condition. The eastern Santa Clara River Basin lies directly north of the site. The Saugus formation and quarternary alluvium are the principle sources of groundwater. The Saugus formation consists of up to 2500 feet of continental sand, clay, and poorly cemented gravel of Plio- Pleistocene age. Beneath valley areas the Saugus formation is overlain by up to 100 feet of alluvial sand and gravel with some clay and silt. Groundwater depth in the area generally ranges from 70 to 80 feet.

III. VIEW AND EVALUATION:

The ISD issued on September 25, 1981, does not contain groundwater monitoring requirements. Prior to the above-ground storage system, the company disposed of their phosporus processing wastewater to a surface impoundment located in the southwest area of the site.

A closure plan for the surface impoundment was submitted by the company to DOHS on September 9, 1983, pursuant to 40CFR265.228 Subpart G regulations. Soil test results from samples obtained from beneath the surface impoundment area showed no evidence of any contamination. The surface impoundment was removed from operation by November 1, 1983. No groundwater monitoring system at the facility is required for current ISD compliance. There is a production well located at the north edge of the facility which is mainly used for fire protection purposes. A recent water analysis report provided by the company at the time of this inspection reported testing for some of the indicator parameters such as pH and specific conductance (pH = 7.5, sp. conductance = 1100). This may indicate that contamination in the deeper aquifer might not exist.

Based on the available data, meeting with DOHS staff in April 85, and a site visit by Regional Board staff, it is recommended that groundwater from the facility's production well should be analyzed for more parameters in order to make any final determination regarding necessity for a groundwater monitoring program. Regional Board will ask the company to conduct some additional sampling.

APPENDIX A-1

FACILITY INSPECTION FORM FOR COMPLIANCE WITH INTERIM STATUS STANDARDS COVERING GROUND-WATER MONITORING

Company Name: Bermite Division Whittaker Corporation ; EPA I.D. Number: CAD064573108

Company Address: 22116 West Soledad Road Saugus ; Inspector's Name: Athar Khan

Company Contact/Official: Thomas Bloom ; Branch/Organization: Environmental

Title: Environmental Affair Director ; Date of Inspection: May 10, 1985

	Yes	No	Unknown	Waived
Type of facility: (check appropriately)				
a) surface impoundment		X	(Not at this time)	
b) landfill		X		
c) land treatment facility		X		
d) disposal waste pile*		X		
Ground-Water Monitoring Program				
1. Was the ground-water monitoring program reviewed prior to site visit? If "No",		X		
a) Was the ground-water program reviewed at the facility prior to site inspection?		X		
2. Has a ground-water monitoring program (capable of determining the facility's impact on the quality of groundwater in the uppermost aquifer underlying the facility) been implemented? 265.90(a)		X(1)		

*Listed separate from landfill for convenience of identification.

(1) RCRA groundwater monitoring program requirements were not included in the facility ISD, therefore such a program was not developed by the company. A surface impoundment at the facility was replaced by an above-ground tank system. A closure plan pursuant to 40CFR 265.228 Subpart G was filed by the company at DOHS in September 1983. Regional Board is investigating whether or not a groundwater monitoring program is necessary for this facility. RCRA regulations contained in 40CFR265.90 are not applicable, and the remaining of the pages of this form are not filled out.

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

George Deukmejian, Governor

DEPARTMENT OF HEALTH SERVICES
107 SOUTH BROADWAY, ROOM 7128
LOS ANGELES, CA 90012
(213) 620-2380

January 19, 1983

Certified Mail
Return Receipt Requested
P 399 083 731

Mr. Zoyd Luce
Bermite Division
Whittaker Corp.
22116 West Soledad Canyon Road
Saugus, CA 91350

Dear Mr. Luce:

INTERIM STATUS DOCUMENT COMPLIANCE INSPECTION

On January 6, 1983, an inspection was made of the Bermite facility in Saugus to verify compliance with the conditions set forth in the Interim Status Document No. CAD064573108 issued on September 25, 1981.

In order to achieve full compliance with the conditions set forth in the ISD, you are hereby requested to institute corrective measures for the following deficiencies:

1. Section II(1)(c&d) - Waste storage areas must fulfill ISD requirements for construction of an impervious base and provision to prevent run-off from these areas. Caution signs as described in the ISD must be posted and visible from any direction of access or view of hazardous waste stored in Hazardous Waste Storage Areas.

2. Section II(11) - You are required to complete fencing off the perimeter of the facility property to prevent unauthorized entrance to the hazardous waste areas of the facility.

3. Section III(3)(a)(1-3)(b)(1-5) - A waste analysis plan as described in the ISD is required to be developed. A copy of this plan is to be submitted to this Department for approval.

4. Section III(6)(a)(3)(i-Vi)(d)(1-4) - The hazardous waste training program for your facility must meet all the criteria specified in the ISD including the appropriate documentation of this training program.

5. Section III(12)(13)(a-f)(14)(a&b) - Your current contingency plan must be revised to include a list of all emergency equipment at the facility, locations of this equipment, descriptions of each item on this list and a brief outline of its capabilities. Copies of the revised contingency plan must be submitted to this office as well as to all local police departments, fire departments, hospitals and local emergency response teams.

6. You required to develop documentation showing sufficient financial resources to cover the cost of closing your facility in accordance with your closure plan. Approved methods for meeting this financial assurance requirement are described in detail in Section 265.143, Title 40, Code of Federal Regulations (CFR). Written evidence of such financial assurance must be sent to:

   Thomas C. Jones, Acting Chief
   Permits, Surveillance and Enforcement Section
   Hazardous Waste Management Branch
   714 P. Street, Room 550
   Sacramento, CA 95814

   An additional copy should be sent to this office at the letterhead address.

Due to the present operation of two surface impoundments at the Bermite facility, the current ISD issued to Bermite will be revised to reflect State requirements for surface impoundment operation. Such requirements involve provision for Ground-Water Monitoring in addition to minimum requirements for surface impoundment maintenance. Until the revised ISD is issued, the current document will remain in effect. Enclosed you will find copies of those sections that will be officially added to your ISD at a later date. I would suggest that you examine these sections and develop a plan to comply with these requirements in light of the forthcoming revisions to the current document.

You are hereby requested to provide this office, by February 15, 1983, a written report outlining the measures to be taken to bring your facility's hazardous waste activities into full compliance with the requirements set forth in the ISD. Include a list of completion dates for each mitigation measure proposed.

If you have any questions regarding this correspondence or related matters, feel free to contact this office at the letterhead telephone number.

Sincerely,

John A. Hinton, P.E.
Regional Administrator
Southern Region
Permits, Surveillance and
Enforcment Section
Hazardous Waste Management Branch

Enclosure

GROUND-WATER MONITORING

1. Ground-water monitoring.

(a) Effective November 19, 1981, the owner or operator shall implement a ground-water monitoring program which is capable of determining the facility's impact on the quality of ground water in the uppermost aquifer underlying the facility. A ground-water monitoring system shall be part of the ground-water monitoring program. The ground-water monitoring system shall be capable of yielding ground-water samples for analysis, and shall consist of:

(1) Monitoring wells (at least one) installed hydraulically upgradient (i.e., in the direction of increasing static head) from the limit of the waste management area. Their number, locations, and depths shall be sufficient to yield ground-water samples that are:

(i) Representative of background ground-water quality in the uppermost aquifer near the facility; and

(ii) Not affected by the facility; and

(2) Monitoring wells (at least three) installed hydraulically downgradient (i.e., in the direction of decreasing static head) at the limit of the waste management area. Their number, locations, and depths shall ensure that they immediately detect any statistically significant amounts of hazardous waste or hazardous waste constituents that migrate from the waste management area to the uppermost aquifer.

(b) All monitoring wells shall be cased in a manner that maintains the integrity of the monitoring well bore hole. This casing shall be screened or perforated, and packed with gravel or sand where necessary, to enable sample collection at depths where appropriate aquifer flow zones exist. The annular space (i.e., the space between the bore hole and well casing) above the sampling depth shall be sealed with a suitable material (e.g., cement grout or bentonite slurry) to prevent contamination of samples and the ground water.

2. Sampling and analysis.

(a) The owner or operator shall obtain and analyze samples from the installed groundwater monitoring system. The owner or operator shall follow a ground-water sampling and analysis plan. The plan shall be subject to approval by the California State Department of Health Services and shall be kept at the facility. The plan shall include procedures and techniques for:

(1) Sample collection;

(2) Sample preservation and shipment;

(3) Analytical procedures; and

(4) Chain of custody control.

(b) The owner or operator shall determine the concentration or value of the following parameters in ground-water samples in accordance with Item 2(c) and (d):

(1) Parameters characterizing the suitability of the ground water as a drinking water supply as specified by EPA in Appendix III, Part 265, Title 40, Code of Federal Regulations.

(2) Parameters establishing ground-water quality:

(i) Chloride
(ii) Iron
(iii) Manganese
(iv) Phenols
(v) Sodium
(vi) Sulfate

(3) Parameters used as indicators of ground-water contamination:

(i) pH
(ii) Specific Conductance
(iii) Total Organic Carbon
(iv) Total Organic Halogen

(c) (1) For all monitoring wells, the owner or operator shall establish initial background concentrations or values of all parameters specified in Item 2(b). This shall be done quarterly for one year.

(2) For each of the indicator parameters specified in Item 2 (b)(3), at least four replicate measurements shall be obtained for each sample and the initial background arithmetic mean and variance shall be determined by pooling the replicate measurements for the respective parameter concentrations or values in samples obtained from upgradient wells during the first year.

(d) After the first year, all monitoring wells shall be sampled and the samples analyzed with the following frequencies:

(1) Samples collected to establish ground-water quality shall be obtained and analyzed for the parameters specified in Item 2(b)(2) at least annually.

(2) Samples collected to indicate ground-water contamination shall be obtained and analyzed for the parameters specified in Item 2(b)(3) at least semi-annually.

(e) Elevation of the ground-water surface at each monitoring well shall be determined each time a sample is obtained.

3. Preparation, evaluation, and response.

(a) By November 19, 1981, the owner or operator shall prepare an outline of a ground-water quality assessment program. The outline shall describe a more comprehensive ground-water monitoring program (than that described in Items 1 and 2) capable of determining:

(1) Whether hazardous waste or hazardous waste contituents have entered the ground water.

(2) The rate and extent of migration of hazardous waste or hazardous waste constituents in the ground water; and

(3) The concentrations of hazardous waste or hazardous waste constituents in the ground water.

(b) For each indicator parameter specified in Item 2(b)(3), the owner or operator shall calculate the arithmetic mean and variance, based on at least four replicate measurements on each sample, for each well monitored in accordance with Item 2(d)(2), and compare these results with its initial background arithmetic mean. The comparison shall consider individually each of the wells in the monitoring system, and shall use the Student's t-test at the 0.01 level of significance to determine statistically significant increases (and decreases, in the case of pH) over initial background.

(c) (1) If the comparisons for the upgradient wells made under Item 3(b) show a significant increase (or pH decrease), the owner or operator shall submit this information in accordance with Item 4(a)(2)(ii).

(2) If the comparisons for downgradient wells made under Item 3 (b) show a significant increase (or pH decrease), the owner or operator shall immediately obtain additional ground-water samples from those downgradient wells where a significant difference was detected, split the samples in two, and obtain analyses of all additional samples to determine whether the significant difference was a result of laboratory error.

(c) (1) If the analyses performed under Item 3(c)(2) confirm the significant increase (or pH decrease), the owner or operator shall provide written notice to the California Regional Water Quality Control Board within seven days of the date of such confirmation, that the facility may be affecting ground-water quality.

(2) Within 15 days after the notification under Item 3(d)(1), the owner or operator shall develop and submit to the California Regional Water Quality Control Board for approval a specific plan, based on the outline required under Item 3(a) and certified by a qualified geologist or geotechnical engineer, for a ground-water quality assessment program at the facility.

(3) The plan to be submitted under Item 3(d)(2) shall specify:

(i) The number, location, and depth of wells;

(ii) Sampling and analytical methods for those hazardous wastes or hazardous waste constituents in the facility;

(iii) Evaluation procedures, including any use of previously gathered ground-water quality information; and

(iv) A schedule of implementation.

(4) The owner or operator shall implement the ground-water quality assessment plan which satisfies Item 3(d)(3), and, at a minimum, determine:

(i) The rate and extent of migration of the hazardous waste or hazardous waste constituents in the ground water; and

(ii) The concentrations of the hazardous waste or hazardous waste constituents in the ground water.

(5) The owner or operator shall make the first determination under Item 3(d)(4) as soon as technically feasible, and, within 15 days after that determination, submit to the California Regional Water Quality Control Board a written report containing an assessment of the ground-water quality.

(6) If the owner or operator determines, based on the results of the first determination under Item 3(d)(4), that no hazardous waste or hazardous waste constituents from the facility have entered the ground water, the indicator evaluation program described in Item 2 and Item 3(b) shall be reinstated. When the owner or operator reinstates the indicator evaluation program he shall notify the California Regional Water Quality Control Board in the report submitted under Item 3(d)(5).

(7) If the owner or operator determines, based on the first determination under Item 3(d)(4), that hazardous waste or hazardous waste constituents from the facility have entered the ground water, then:

(i) The determinations required under Item 3(d)(4) shall continue to be made on a quarterly basis until final closure of the facility, if the ground-water quality assessment plan was implemented prior to final closure of the facility; or

(ii) The determinations required under Item 3(d)(4), may cease to be made if the ground-water quality assessment plan was implemented during the post-closure care period.

(e) Any ground-water quality assessment to satisfy the requirements of Item 3(d)(4) which is initiated prior to final closure of the facility shall be completed and reported in accordance with Item 3(d)(5).

(f) Unless the ground water is monitored to satisfy Item 3(d)(4), at least annually the owner or operator shall evaluate the data on ground-water surface elevations obtained under Item 2(e) to determine whether the requirements under Item 1(a) for locating the monitoring wells continues to be satisfied. If the evaluation shows that Item 1(a) is no longer satisfied, the owner or operator shall immediately modify the number, location, or depth of the monitoring wells to bring the ground-water monitoring system into compliance with this condition.

4. Recordkeeping and reporting.

(a) Unless the ground water is monitored to satisfy the requirements of Item 3(d)(4), the owner or operator shall:

(1) Keep records of the analyses required in Item 2(c) and (d), the associated ground-water surface elevations required in Item 2(e), and the evaluations required in Item 3(b) throughout the active life of the facility; and

(2) Report the following ground-water monitoring information to the California Regional Water Quality Control Board:

(i) During the first year when initial background concentrations are being established for the facility: Concentrations or values of the parameters listed in Item 2(b)(1) for each ground-water monitoring well within 15 days after completing each quarterly analysis. The owner or operator shall separately identify for each monitoring well any parameters whose concentration or value has been found to exceed the maximum contaminant levels specified by EPA in Appendix III, Part 265, Title 40, Code of Federal Regulations.

(ii) Annually: Concentrations or values of the parameters listed in Item 2(b)(3) for each ground-water monitoring well, along with the required evaluations for these parameters under Item 3(b). The owner or operator shall separately identify any significant differences from initial background found in the upgradient wells, in accordance with Item 3(c)(1). During the active life of the facility, this information shall be submitted as part of the annual report required elsewhere in this document.

(iii) As a part of the annual report required elsewhere in this document: Results of the evaluation of ground-water surface elevations under Item 3(f), and a description of the response to that evaluation, where applicable.

(b) If the ground water is monitored to satisfy Item 3(d)(4), the owner or operator shall:

(1) Keep records of the analyses and evaluations specified in the plan, which satisfies Item 3(d)(3), throughout the active life of the facility; and

(2) Annually, until final closure of the facility, submit to the California Regional Water Quality Control Board a report containing the results of his ground-water quality assessment program which includes, but is not limited to, the calculated (or measured) rate of migration of hazardous waste or hazardous waste constituents in the ground water during the reporting period. This report shall be submitted as part of the annual report required elsewhere in this document.

5. Waiver

The foregoing conditions may be waived if the owner or operator can demonstrate in writing to the satisfaction of the California Regional Water Quality Control Board that there is a low potential for migration of hazardous waste or hazardous waste constituents from the facility via the uppermost aquifer to water supply wells or to surface water.

SURFACE IMPOUNDMENTS

1. Freeboard

The surface impoundment(s) shall maintain enough freeboard (at least 60 centimeters (2 feet)) to prevent any overtopping of the dike by overfilling, wave action, or a storm.

2. Dikes

All earthen dikes shall have a protective cover, such as grass, shale, or rock, to minimize wind and water erosion and to preserve their structural integrity.

3. Analysis of waste

(a) Whenever a surface impoundment is to be used for:

(1) Chemically treating a hazardous waste which is substantially different from waste previously treated in that impoundment; or

(2) Chemically treating hazardous waste with a substantially different process than any previously used in that impoundment; the owner or operator shall, before treating the different waste or using the different process:

(i) Conduct waste analyses and trial treatment tests (e.g., bench scale or pilot plant scale tests); or

(ii) Obtain documented information on similar treatment of similar waste under similar operating conditions; to show that this treatment will comply with Item 7(b), Part III of this document.

4. Inspections

(a) The owner or operator shall inspect:

(1) The freeboard level at least once each operating day to ensure compliance with Item 1; and

(2) The surface impoundment, including dikes and vegetation surrounding the dikes, at least once a week to detect any leaks, deterioration, or failures in the impoundment.

5. Closure and post-closure

(a) At closure, the owner or operator may elect to remove from the impoundment:

(1) Standing liquids;

(2) Waste and waste residues;

(3) The liner, if any; and

(4) Underlying and surrounding contaminated soil.

(b) If the owner or operator removes all the impoundment materials listed in Item 5(a), or can demonstrate that none of the materials listed in Item 5(a) remaining at any stage of removal are hazardous wastes, the impoundment is not further subject to the requirements of this document.

(c) If the owner or operator does not remove all the impoundment materials listed in Item 5(a) or does not make the demonstration in Item 5(b), he shall close the impoundment and provide post-closure care as specified elsewhere in this document. If necessary to support the final cover specified in the approved closure plan, the owner or operator shall treat remaining liquids, residues, and soils by removal of liquids, drying, or other means.

6. Ignitable or reactive wastes

(a) Ignitable or reactive waste shall not be placed in a surface impoundment, unless:

(1) The waste is treated, rendered, or mixed before or immediately after placement in the impoundment so that:

(i) The resulting waste, mixture, or dissolution of material no longer meets the definition of ignitable or reactive waste; and

(ii) The requirements of Item 7(b), Part III of this document are met; or

(2) The surface impoundment is used solely for emergencies.

7. Incompatible wastes

Incompatible wastes, or incompatible wastes and materials, shall not be placed in the same surface impoundment, unless the requirements of Item 7(b), Part III of this document are met.

CAD 064 573 108

ACTON •
MICKELSON •
ENVIRONMENTAL, INC.

Consulting Scientists, Engineers, and Geologists

November 11, 1998

Mr. Hamid Saebfar, Chief
Site Mitigation Branch, Region 3
Attention: Whittaker Project Manager
California Department of Toxic Substances Control
1011 North Grandview Avenue
Glendale, California 91201

Subject: Monthly Summary Report No. 48 - October 1998
Whittaker Corporation, Bermite Facility
22116 West Soledad Canyon Road, Santa Clarita, California 21001.63/7

Dear Mr. Saebfar:

Acton • Mickelson • Environmental, Inc. (AME), has been authorized by Whittaker Corporation (Whittaker) to conduct a Remedial Investigation/Feasibility Study (RI/FS) of the Bermite facility located at 22116 West Soledad Canyon Road, Santa Clarita, California, in response to the requirements of a Consent Order entered into between Whittaker and the California Environmental Protection Agency, Department of Toxic Substances Control, Site Mitigation Branch, Region 3 (Cal-EPA). During the RI/FS process, an overall site investigation will be conducted and remediation strategy will be developed.

This monthly summary report is submitted in accordance with provision 6.5 of the Consent Order. This document reviews the activities performed during the month of October 1998, and describes the tasks anticipated for the current month (November 1998) and the next calendar month (December 1998).

Activities During the Previous Calendar Month (October 1998)

- Operation of the vapor extraction system at the Former Area 317 Surface Impoundment continued. The system extracted an estimated 100 pounds of volatile organic compounds during the month.

98-424.dk

5050 Robert J. Mathews Parkway
El Dorado Hills, California 95762

(916) 939-7550
Fax (916) 939-7570

- Vapor probe flame ionization detector measurements obtained from the Former Area 317 Surface Impoundment soil vapor monitoring probes for October 1998 (on October 27, 1998) are shown in Table 1.

- Submitted a report to Cal-EPA on October 13, 1998 documenting results of on site sediment sampling conducted on August 18, 1998. The work was accomplished in accordance with technical memorandum entitled *Addendum to Surface Water Sampling Plan to Implement Sediment Sampling Program, Whittaker Corporation, Bermite Facility,* dated August 14, 1998. The Plan was approved on August 17, 1998.

- Submitted to Cal-EPA on October 13, 1998 a technical memorandum report documenting results of field work proposed in technical memorandum *Additional Characterization of Perchlorate - Impacted Soil at Area 55 Associated with Off-site Migration of Perchlorate in Surface Water, Whittaker Corporation, Bermite Facility* as approved by Cal-EPA on June 17, 1998. The Area 55 characterization activities included soil boring and surface soil sampling on the Area 55 former operations pad and sediment sampling in the drainage downslope of Area 55.

- Submitted to Cal-EPA on October 13, 1998 a technical memorandum report documenting results of completed field work proposed in technical memorandum *Additional Ground Water Investigation in the Vicinity of the Abandoned Highway Well Located in Area 75, Whittaker Corporation, Bermite Facility* dated February 25, 1998, as modified in the field and as conditionally approved by Cal-EPA on February 20, 1998.

- Prepared a draft Quarterly Monitoring Report for the Former Area 317 Surface Impoundment.

- Prepared a draft letter report for perchlorate analysis of ground water samples collected September 10, 1998 from Area 317 monitoring wells.

Deviations From the Original Work Plans

None

Recommendations for Additional Work

None

Activities Anticipated for the Current Month (November 1998)

- Continue operation and monitoring of the vapor extraction system at the Former Area 317 Surface Impoundment.
- Finalize the Quarterly Ground Water Monitoring Report for the Former Area 317 Surface Impoundment.
- Finalize a letter report of analytical results for perchlorate in samples collected from Former Area 317 monitoring wells.
- Prepare a work plan for mitigation and additional investigation of perchlorate-impacted soil at Area 55.
- Prepare a work plan for the abandonment of the Highway Well and additional investigation activities at Area 75.
- Prepare a work plan for the collection of additional surface water runoff samples.
- Provide support to Cal-EPA staff for the November 19, 1998 public meeting.
- Coordinate with local water purveyors for depth-specific sampling of select supply wells.
- Meet with Cal-EPA and representatives of local water purveyors on November 5, 1998.

Activities Planned for the Next Calendar Month (December 1998)

- Continue operation and monitoring of the vapor extraction system at the Former Area 317 Surface Impoundment.

Requirements of the Consent Order Not Completed

None

Problems and Corrective Actions

None

Findings of Sample Analysis and Other Tests

Laboratory analytical reports will be included in the previously referenced reports.

Please call should you have any questions or comments regarding this monthly summary report.

Very truly yours,

ACTON • MICKELSON • ENVIRONMENTAL, INC.

FOR

Barbara J. Mickelson, P.E.
California Registered Professional
Engineer #43417

BJM:dk

Enclosures

cc: Mr. Glen AbdunNur, Whittaker Corporation, Bermite Division
Ms. Lynne M. O. Brickner, Esq., Whittaker Corporation
Ms. Sayareh Amir, California Department of Toxic Substances Control
Ms. Mary Blevins, U.S. Environmental Protection Agency, Region IX
Mr. Thomas Cota, California Department of Toxic Substances Control
Mr. Tom Klinger, Los Angeles County Fire Department
Mr. Richard McJunkin, California Department of Toxic Substances Control

TABLE 1
Former Area 317 Surface Impoundment - Vapor Probe Measurements 1989 to Present

PROBE:	P1-20 @ 1441 ft	P1-40 @ 1421 ft	P1-60 @ 1401 ft	P1-80 @ 1381 ft	P1-100 @ 1361 ft	P1-120 @ 1341 ft	P2-20 @ 1440 ft	P2-40 @ 1420 ft	P2-60 @ 1400 ft	P2-80 @ 1380 ft	P2-100 @ 1360 ft	P2-120 @ 1340 ft	P3-20 @ 1440 ft	P3-40 @ 1420 ft	P3-60 @ 1400 ft	P3-80 @ 1380 ft	P3-100 @ 1360 ft	P3-120 @ 1340 ft	P4-60 @ 1398 ft	P4-120 @ 1338 ft	P5-60 @ 1400 ft	P5-100 @ 1360 ft	P6-30 @ 1476 ft	P6-63 @ 1443 ft	P7-30 @ 1484 ft	P7-57 @ 1454 ft	P8 @ 1331 ft	P9 @ 1336 ft	P10 @ 1333 ft	P11 @ 1321 ft	P12 @ 1332 ft	P13 @ 1338 ft	P14 @ 1332 ft	P15 @ 1333 ft	P16 @ 1286 ft	P17 @ 1298 ft	P18 @ 1252 ft
DATE	OVA, ppm	OVA, ppm	OVA, ppm	OVA, ppm	OVA, ppm	OVA, ppm	OVA, ppm	OVA, ppm	OVA, ppm	OVA, ppm	OVA, ppm	OVA, ppm	OVA, ppm	OVA, ppm	OVA, ppm	OVA, ppm	OVA, ppm	OVA, ppm	OVA, ppm	OVA, ppm	OVA, ppm	OVA, ppm	OVA, ppm	OVA, ppm	OVA, ppm	OVA, ppm	OVA, ppm	OVA, ppm	OVA, ppm	OVA, ppm	OVA, ppm	OVA, ppm	OVA, ppm	OVA, ppm	OVA, ppm	OVA, ppm	OVA, ppm
25-Apr-96	3	6	25	18	25	150	6	35	40	5	5	50	10	8	240	14	25	60	8	40	4	25	0	0	0	0	4	10	3	100	15	4	5	200	50	0	0
29-May-96	1	2	30	20	28	220	0	30	2	0	0	15	1	1	60	3	1	5	2	25	7	35	0	0	0	0	1	9	0	50	25	4	3	180	0	1	1
1-Jun-96																																					
2-Jul-96	1	5	25	10	5	70	1	25	20	5	4	35	2	1	100	16	10	35	1	16	2	20	0	0	0	0	0	8	0	140	30	0	1	100	30	0	0
1-Aug-96	4	45	25	20	3	20	10	12	35	14	4	60	16	8	80	25	16	40	3	60	4	4	0	0	0	0	0	6	0	90	22	2	2	95	25	0	0
24-Sep-96	2	10	20	12	4	45	1	15	25	6	2	50	4	4	70	20	8	40	2	45	0	10	0	0	0	0	0	6	0	100	20	2	1	90	26	0	0
1-Oct-96																																					
19-Nov-96	3	18	40	20	15	20	4	15	30	22	2	5	2	2	100	70	25	2	10	8	18	75	0	0	0	0	0	9	0	35	10	1	5	50	0	0	0
1-Dec-96																																					
1-Jan-97																																					
13-Feb-97	0	8	60	65	30	90	1	2	1	0	0	1	2	1	4	0	1	30	1	0	0	250	0	0	0	0	0	5	0	4	7	0	0	45	0	0	0
5-Mar-97	2	5	28	20	20	3	1	6	1	1	0	0	0	0	3	1	1	0	0	0	1	250	0	0	0	0	0	4	0	3	5	0	0	40	0	0	0
8-Apr-97	0	6	14	7	7	10	2	2	2	1	0	1	0	0	8	0	0	0	0	0	0	80	0	0	0	0	0	4	0	6	8	1	1	50	0	0	0
28-May-97	0	9	7	4	4	15	0	1	2	0	0	5	0	1	8	0	0	4	0	3	0	60	0	0	0	0	0	3	1	20	4	5	1	50	0	0	0
26-Jun-97	2	4	8	7	12	75	0	2	18	6	35	0	5	10	5	3	4	13	220	18	4	200	0	0	0	0	8	9	3	200	25	18	2	130	9	2	1
1-Jul-97	5	30	40	35	70	90	3	12	250	40	3	8	1	1	10	5	1	2	130	7	2	60	2	1	1	1	3	5	7	70	35	25	3	100	2	1	1
19-Aug-97	7	16	43	55	45	17	9	22	35	65	1	2	4	8	100	90	8	2	8	2	0	170	0	0	0	0	0	7	1	21	11	23	1	100	0	0	0
30-Sep-97 [1]	50	90	140	150	180	190	40	80	100	200	15	100	2	10	350	450	80	150	250	100	80	450	0	0	0	0	12	25	0	400	50	12	60	250	150	4	0
31-Oct-97	0	70	110	100	150	200	10	35	75	280	10	120	4	8	350	750	35	100	350	95	90	500	0	0	0	0	9	8	0	500	25	10	80	150	50	0	0
1-Nov-97																																					
11-Dec-97 [2]	20	90	160	190	250	300	25	70	100	250	10	120	5	12	400	700	80	190	500	150	120	800	0	0	0	0	18	1	5	500	30	8	70	150	50	1	1
28-Jan-98	0	80	100	80	100	300	4	12	14	350	16	200	5	9	500	1,600	70	140	500	100	140	10	0	0	0	0	16	24	4	400	30	8	70	250	100	3	1
28-Feb-98	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm
17-Mar-98	4	50	60	50	70	14	5	8	25	300	20	200	7	9	250	1,000	160	180	350	150	45	200	0	0	0	0	16	30	12	450	15	8	70	300	50	0	0
30-Apr-98	0	13	1	0	8	80	16	8	60	90	14	200	6	9	100	300	70	70	190	80	40	350	0	0	0	0	8	2	0	300	18	5	40	90	300	0	0
3-Jun-98	0	25	30	30	60	180	9	9	60	200	13	250	9	10	300	80	80	180	140	100	35	300	0	0	0	0	4	4	0	350	25	7	35	80	350	0	0
7-Jul-98	0	12	4	7	16	180	8	6	20	100	10	200	7	6	190	400	18	100	180	100	16	200	0	0	0	0	7	5	0	350	7	8	25	30	180	0	0
6-Aug-98	0	1	7	5	6	85	1	0	10	100	2	200	2	2	140	250	50	95	120	100	20	140	0	0	0	0	8	0	0	350	8	7	35	100	230	0	0
2-Sep-98	2	8	16	5	12	100	0	1	16	190	7	190	0	1	120	180	40	100	140	140	14	150	0	0	0	0	9	4	1	500	15	6	30	200	250	0	0
6-Oct-98	0	1	5	1	2	100	1	2	6	60	4	100	0	2	100	180	14	17	200	160	18	100	0	0	0	0	7	4	1	300	4	7	40	45	250	2	1
27-Oct-98	0	1	10	1	8	80	0	1	5	80	1	170	1	5	80	350	12	100	160	180	14	190	0	0	0	0	7	1	0	700	5	7	40	60	200	5	0

[1] Change in operating protocol, probes capped.

[2] New Cat-Ox installed and operated.

TABLE 1
Former Area 317 Surface Impoundment - Vapor Probe Measurements 1989 to Present

PROBE:	P1-20 @ 1441 ft OVA,	P1-40 @ 1421 ft OVA,	P1-60 @ 1401 ft OVA,	P1-80 @ 1381 ft OVA,	P1-100 @ 1361 ft OVA,	P1-120 @ 1341 ft OVA,	P2-20 @ 1440 ft OVA,	P2-40 @ 1420 ft OVA,	P2-60 @ 1400 ft OVA,	P2-80 @ 1380 ft OVA,	P2-100 @ 1360 ft OVA,	P2-120 @ 1340 ft OVA,	P3-20 @ 1440 ft OVA,	P3-40 @ 1420 ft OVA,	P3-60 @ 1400 ft OVA,	P3-80 @ 1380 ft OVA,	P3-100 @ 1360 ft OVA,	P3-120 @ 1340 ft OVA,	P4-60 @ 1398 ft OVA,	P4-120 @ 1338 ft OVA,	P5-60 @ 1400 ft OVA,	P5-100 @ 1360 ft OVA,	P6-30 @ 1476 ft OVA,	P6-63 @ 1443 ft OVA,	P7-30 @ 1484 ft OVA,	P7-57 @ 1454 ft OVA,	P8 @ 1331 ft OVA,	P9 @ 1336 ft OVA,	P10 @ 1333 ft OVA,	P11 @ 1321 ft OVA,	P12 @ 1332 ft OVA,	P13 @ 1338 ft OVA,	P14 @ 1332 ft OVA,	P15 @ 1333 ft OVA,	P16 @ 1286 ft OVA,	P17 @ 1298 ft OVA,	P18 @ 1252 ft OVA,
DATE	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm
22-Mar-89	200	400	5,000	200	150	0	2,700	3,900	11,900	3,400	nm	55	350	300	200	600	350	50	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a
29-Mar-89	400	700	7,500	1,100	800	80	1,500	6,500	8,000	5,500	nm	230	400	900	850	700	230	210	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a
6-Apr-89	500	1,000	7,000	800	800	20	1,500	4,000	4,000	2,500	100	200	500	1,000	900	200	250	220	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a
13-Apr-89	1,200	2,000	8,000	1,200	900	600	4,800	7,500	9,000	5,000	700	250	1,000	2,000	1,500	850	240	170	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a
20-Apr-89	1,200	2,600	11,000	1,200	1,000	70	3,200	8,000	8,000	4,000	50	190	1,000	2,500	2,000	1,000	320	200	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a
5-May-89	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	700	15	50	110	25	160	50	110	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a
14-Jun-89	1,800	4,000	10,000	1,600	800	150	4,000	8,000	7,000	3,500	800	200	2,500	4,000	4,000	1,500	400	250	5,000	nm	800	250	160	450	100	200	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a	n/a
21-Jun-89	2,500	7,500	10,000	3,000	1,400	250	6,000	9,000	8,500	4,500	900	400	2,600	4,000	3,500	1,700	400	250	4,500	nm	1,000	300	200	450	140	200	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a	n/a
28-Jun-89	900	2,000	16,000	1,100	750	450	2,500	3,000	2,500	1,500	400	100	2,900	5,000	4,500	1,500	400	100	6,000	nm	450	240	200	400	140	170	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a	n/a
5-Jul-89	2,200	4,000	10,000	2,500	1,200	400	4,500	6,000	3,500	2,000	500	150	2,500	4,400	3,500	1,500	320	150	5,000	nm	600	250	200	500	150	170	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a	n/a
19-Jul-89	250	500	1,500	2,700	1,500	400	8,000	12,000	9,000	4,000	1,500	350	4,000	6,000	6,000	2,000	500	400	4,500	nm	400	300	250	450	200	250	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a	n/a
4-Aug-89	200	400	1,200	2,500	1,200	300	5,000	9,000	8,000	4,000	1,100	200	3,000	4,500	5,000	1,800	300	250	500	nm	350	200	250	600	180	200	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a	n/a
10-Aug-89	220	300	1,000	2,200	1,100	250	4,000	7,500	7,000	3,500	900	200	2,500	4,000	3,500	1,500	270	250	7,000	nm	300	150	200	600	150	250	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a	n/a
17-Aug-89	2,000	4,000	10,000	1,800	1,000	350	4,500	6,000	7,000	3,000	1,000	200	2,500	4,000	3,500	1,700	450	250	6,000	nm	400	1,000	250	400	350	50	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a	n/a
24-Aug-89	2,200	4,000	9,000	1,600	900	300	4,000	6,500	7,000	2,800	900	200	2,000	4,000	4,000	1,500	1,000	220	6,500	nm	400	1,000	400	500	300	120	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a	n/a
31-Aug-89	2,000	3,800	10,000	1,900	1,000	270	4,200	6,200	10,000	2,500	750	170	6,000	5,000	4,500	1,500	900	200	6,000	nm	300	900	300	450	250	150	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a	n/a
8-Sep-89	1,700	4,000	9,000	1,500	900	300	9,000	11,000	12,000	5,000	1,600	200	4,000	6,000	6,000	2,500	650	100	6,000	nm	500	1,000	250	430	200	220	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a	n/a
15-Sep-89	1,500	3,500	9,000	1,400	1,000	450	9,000	10,000	9,000	5,000	1,500	400	5,000	6,500	6,000	2,200	800	200	9,000	nm	400	1,200	300	500	400	250	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a	n/a
27-Sep-89	1,700	4,000	11,000	1,200	900	350	10,000	10,000	9,000	4,500	1,400	400	4,500	6,000	7,000	2,000	700	250	9,000	nm	450	900	210	400	300	330	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a	n/a
9-Oct-89	1,400	3,500	10,000	1,000	700	250	9,000	9,000	7,000	3,500	1,000	250	4,200	5,000	6,000	2,100	500	190	5,000	nm	350	500	200	320	200	150	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a	n/a
18-Dec-89																																						
1-Jan-90																																						
1-Feb-90																																						
1-Mar-90																																						
1-Apr-90																																						
1-May-90																																						
1-Jun-90																																						
1-Jul-90																																						
1-Aug-90																																						
1-Sep-90																																						
1-Oct-90																																						
1-Nov-90																																						
18-Dec-90	1	0	4	1	11	450	3	195	160	16	35	6	0	4	600	15	17	16	2	nm	9	nm	0	4	0	1	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a	n/a
1-Jan-91																																						
20-Feb-91	0	0	0	0	2	0	0	40	3	0	3	0	0	0	45	0	2	0	0	nm	0	0	0	0	0	0	0	0	18	150	0	0	75	6	0	n/a	n/a	n/a
8-Mar-91	0	0	130	0	0	20	0	200	60	24	24	0	0	0	600	9	15	5	0	0	0	4	0	0	0	0	0	0	40	5	4	10	150	0	11	n/a	n/a	n/a
22-Mar-91	0	0	120	0	0	35	4	250	250	110	25	15	0	3	500	35	10	15	5	25	40	15	0	0	0	0	2	170	50	4	75	75	50	85	n/a	n/a	n/a	n/a
8-Apr-91	6	0	35	0	0	10	0	100	15	30	0	0	0	0	80	0	6	0	0	0	0	0	0	0	0	0	0	20	0	5	12	100	0	6	n/a	n/a	n/a	n/a
25-Apr-91	0	0	7	0	0	10	0	120	30	18	10	2	0	0	200	10	6	0	5	10	0	0	0	0	0	0	0	50	0	4	0	80	4	5	n/a	n/a	n/a	n/a
10-May-91	0	0	10	0	0	35	0	160	30	30	11	25	0	0	100	0	6	12	3	40	0	0	0	0	0	0	0	25	2	75	28	150	15	80	n/a	n/a	n/a	n/a
30-May-91	4	2	6	0	0	20	10	90	55	70	9	20	0	0	400	14	8	10	0	35	3	0	0	0	0	0	0	60	3	27	125	150	12	28	n/a	n/a	n/a	n/a
10-Jun-91	0	0	10	0	0	6	0	100	19	18	10	0	0	0	200	7	5	0	2	8	2	5	0	0	0	0	0	40	20	0	60	150	25	15	n/a	n/a	n/a	n/a
1-Jul-91																																						
1-Aug-91	0	0	3	0	0	9	3	90	100	70	12	3	0	0	110	3	3	0	0	2	0	0	0	0	0	0	0	3	14	0	35	90	3	7	n/a	n/a	n/a	n/a
15-Aug-91	0	0	2	0	0	0	0	40	3	3	5	0	0	0	40	1	4	0	0	0	0	0	0	0	0	0	0	10	80	0	15	80	1	7	n/a	n/a	n/a	n/a
29-Aug-91	0	0	3	0	0	2	0	0	0	0	4	0	0	0	23	0	2	0	0	0	0	0	0	0	0	0	0	4	0	0	9	70	2	4	n/a	n/a	n/a	n/a
12-Sep-91	0	0	110	4	6	0	0	60	12	12	8	0	0	0	4	0	0	0	0	0	0	0	0	0	0	0	0	8	60	0	10	70	0	6	n/a	n/a	n/a	n/a
26-Sep-91	0	0	4	0	0	2	0	20	0	0	2	0	0	0	30	0	2	0	0	0	0	0	0	0	0	0	0	4	0	0	8	50	2	2	n/a	n/a	n/a	n/a
24-Oct-91	0	0	3	0	0	2	0	30	4	3	6	0	0	0	50	3	4	0	0	0	0	0	0	0	0	0	0	12	18	2	20	180	4	10	n/a	n/a	n/a	n/a
1-Nov-91																																						
1-Dec-91																																						
1-Jan-92																																						
1-Feb-92																																						
18-Mar-92	9	12	80	25	20	45	7	80	22	38	30	1	1	1	180	50	25	0	28	35	40	30	0	1	1	2	0	140	120	55	800	200	35	45	n/a	n/a	n/a
1-Apr-92																																						
7-May-92	0	0	8	0	0	3	0	95	7	0	7	0	0	4	30	0	7	0	0	0	600	150	0	0	0	0	0	20	140	0	90	250	35	30	n/a	n/a	n/a
10-Jun-92	0	0	12	0	0	7	0	70	7	0	9	0	0	5	25	0	4	0	0	0	30	40	0	0	0	0	0	13	95	0	65	170	12	17	n/a	n/a	n/a
16-Jul-92	0	0	40	0	0	15	2	45	5	3	5	10	3	4	40	3	7	5	0	9	20	7	0	0	0	0	0	0	0	0	38	80	0	8	n/a	n/a	n/a
26-Aug-92	0	0	100	0	0	0	0	40	2	0	7	0	0	0	7	0	0	0	0	0	3	2	0	0	0	0	0	0	50	0	35	65	0	3	n/a	n/a	n/a
1-Sep-92																																						
15-Oct-92	0	0	35	0	0	0	0	25	4	0	7	0	0	0	15	0	4	0	0	0	3	5	0	0	0	0	0	0	0	0	45	90	4	0	n/a	n/a	n/a
4-Nov-92	0	0	80	0	0	15	0	15	0	0	4	0	0	0	4	0	4	0	0	0	0	0	0	0	0	0	0	4	60	0	40	70	5	7	n/a	n/a	n/a
3-Dec-92	3	1	20	0	0	18	0	15	14	9	4	24	5	3	30	6	7	9	20	40	9	5	0	0	0	0	1	12	6	40	80	50	50	50	n/a	n/a	n/a
1-Jan-93																																						
10-Feb-93	1	0	25	2	0	25	0	15	12	10	6	15	0	0	30	4	15	7	25	30	10	7	0	0	0	0	0	4	0	30	70	50	40	25	n/a	n/a	n/a
9-Mar-93	0	0	70	12	3	40	1	45	6	2	15	2	1	4	80	18	30	14	1	10	6	5	0	0	0	0	0	0	0	10	45	35	3	11	n/a	n/a	n/a
22-Apr-93	0	0	50	15	0	40	0	40	10	0	20	0	0	7	75	20	25	15	0	15	0	0	0	0	0	0	0	0	0	15	55	40	0	4	n/a	n/a	n/a
13-May-93	0	0	20	15	2	30	0	50	20	0	10	15	0	0	70	25	30	12	0	10	0	2	0	0	0	0	0	0	0	12	75	25	50	20	n/a	n/a	n/a
15-Jun-93	1	0	8	15	4	25	0	35	15	5	0	10	4	5	60	20	0	4	28	26	0	5	0	0	0	0	0	1	0	28	210	18	70	60	n/a	n/a	n/a
23-Jul-93	0	0	10	20	5	30	0	50	20	10	0	15	5	7	50	15	0	5	40	20	0	10	0	0	0	0	0	0	0	25	70	25	80	45	n/a	n/a	n/a
11-Aug-93	0	0	10	25	5	20	0	30	10	15	0	12	7	8	65	25	0	2	35	15	0	2	0	0	0	0	0	1	1	20	40	22	55	25	n/a	n/a	n/a
23-Sep-93	0	0	10	10	7	20	2	40	10	5	0	10	8	6	70	20	20	8	25	40	5	4	0	1	0	0	1	1	0	35	17	12	24	35	n/a	n/a	n/a
19-Oct-93	1	1	20	15	3	20	0	20	10	12	0	15	5	9	85	40	15	10	20	25	0	7	0	0	0	0	0	0	0	20	15	17	15	27	n/a	n/a	n/a
18-Nov-93	1	1	20	20	5	25	4	25	20	17	0	8	6	4	90	50	12	6	30	30	7	10	0	0	1	0	0	0	1	40	18	11	13	32	n/a	n/a	n/a
14-Dec-93	2	2	45	9	2	40	7	40	16	7	0	16	9	8	120	80	18	14	30	35	16	16	0	0	0	0	1	0	3	60	5	4	2	25	n/a	n/a	n/a
1-Jan-94																																						
23-Feb-94	1	0	12	1	0	3	0	16	4	1	0	0	0	0	50	12	10	0	0	2	10	9	0	0	0	0	0	4	1	6	4	18	5	30	n/a	n/a	n/a
31-Mar-94	2	0	25	4	1	3	0	25	6	3	0	0	4	3	50	20	2	0	9	3	3	6	0	0	0	0	0	10	1	25	7	30	4	70	n/a	n/a	n/a
29-Apr-94	2	1	20	4	0	4	0	20	5	2	0	0	2	3	45	15	0	0	5	0	3	20	0	0	0	0	0	10	4	15	7	25	7	50	n/a	n/a	n/a
1-May-94																																						
21-Jun-94	0	0	25	16	0	0	0	20	6	2	0	4	0	2	60	10	2	0	12	6	4	35	0	0	0	0	0	4	0	50	2	30	10	40	n/a	n/a	n/a
26-Jul-94	0	0	30	4	0	0	0	35	10	4	0	5	2	2	80	20	8	3	18	16	6	50	0	0	0	0	0	7	0	70	7	40	8	60	n/a	n/a	n/a
26-Aug-94	0	0	12	0	0	7	0	18	2	0	0	0	0	0	12	3	4	0	1	0	1	90	0	0	0	0	0	6	0	40	5	30	7	60	n/a	n/a	n/a
30-Sep-94	0	1	8	0	0	8	0	12	1	0	0	0	0	1	9	2	2	0	0	0	0	75	0	0	0	0	0	4	1	36	6	35	5	45	n/a	n/a	n/a
1-Oct-94																																						
1-Nov-94																																						
1-Dec-94																																						
1-Jan-95																																						
1-Feb-95																																						
1-Mar-95																																						
1-Apr-95																																						
23-May-95	0	0	35	0	0	25	0	25	5	1	0	4	5	6	70	10	0	1	1	15	1	30	0	0	0	0	0	3	0	10	10	25	3	50	n/a	n/a	n/a
28-Jun-95	4	4	25	8	0	0	0	20	3	1	0	0	25	20	70	14	1	2	4	1	0	20	0	0	0	0	0	0	0	12	6	30	2	35	n/a	n/a	n/a
26-Jul-95	5	2	30	4	0	12	0	12	3	2	0	0	15	8	60	15	0	1	5	10	0	20	0	0	0	0	0	0	0	10	8	30	0	30	n/a	n/a	n/a
15-Aug-95	1	1	20	6	0	30	0	25	2	0	0	1	0	0	14	3	0	0	0	0	4	35	0	0	0	0	0	1	0	5	5	1	18	40	n/a	n/a	n/a
1-Sep-95																																						
10-Oct-95	0	1	35	6	0	18	0	16	0	3	0	0	0	4	10	0	1	3	3	0	2	20	0	0	0	0	0	0	0	4	10	15	6	30	n/a	n/a	n/a
1-Nov-95																																						
1-Dec-95																																						
1-Jan-96																																						
13-Feb-96	10	4	18	12	8	25	0	20	1	3	1	1	1	1	30	18	20	1	2	0	7	20	0	0	0	1	0	10	6	10	12	3	8	70	0	0	0
1-Mar-96																																						

CAD 064 573 108

ACTON •
MICKELSON •
ENVIRONMENTAL, INC.

Consulting Scientists, Engineers, and Geologists

October 13, 1998

Mr. Hamid Saebfar, Chief
Site Mitigation Branch, Region 3
Attention: Whittaker Project Manager
California Department of Toxic Substances Control
1011 North Grandview Avenue
Glendale, California 91201

Subject: Monthly Summary Report No. 47 – September 1998
Whittaker Corporation, Bermite Facility
22116 West Soledad Canyon Road, Santa Clarita, California 21001.63/7

Dear Mr. Saebfar:

Acton • Mickelson • Environmental, Inc. (AME), has been authorized by Whittaker Corporation (Whittaker) to conduct a Remedial Investigation/Feasibility Study (RI/FS) of the Bermite facility located at 22116 West Soledad Canyon Road, Santa Clarita, California, in response to the requirements of a Consent Order entered into between Whittaker and the California Environmental Protection Agency, Department of Toxic Substances Control, Site Mitigation Branch, Region 3 (Cal-EPA). During the RI/FS process, an overall site investigation will be conducted and remediation strategy will be developed.

This monthly summary report is submitted in accordance with provision 6.5 of the Consent Order. This document reviews the activities performed during the month of September 1998, and describes the tasks anticipated for the current month (October 1998) and the next calendar month (November 1998).

Activities During the Previous Calendar Month (September 1998)

- Operation of the vapor extraction system at the Former Area 317 Surface Impoundment continued. The system extracted an estimated 109 pounds of volatile organic compounds during the month.

98-376.dk

5050 Robert J. Mathews Parkway
El Dorado Hills, California 95762

(916) 939-7550
Fax (916) 939-7570

- Vapor probe flame ionization detector measurements obtained from the Former Area 317 Surface Impoundment soil vapor monitoring probes for September 1998 (obtained on October 6, 1998) are shown in Table 1.

- AME submitted a draft report to Whittaker on September 14, 1998 documenting results of sediment sampling conducted on August 18, 1998 at sampling locations on site. The work was accomplished in accordance with AME technical memorandum entitled *Addendum to Surface Water Sampling Plan to Implement Sediment Sampling Program, Whittaker Corporation, Bermite Facility,* dated August 14, 1998. The Plan was approved on August 17, 1998.

- AME submitted to Whittaker on September 14, 1998 a draft technical memorandum report documenting results of field work proposed in technical memorandum *Additional Characterization of Perchlorate - Impacted Soil at Area 55 Associated with Off-site Migration of Perchlorate in Surface Water, Whittaker Corporation, Bermite Facility* as approved by Cal-EPA on June 17, 1998. The Area 55 characterization activities included soil boring and surface soil sampling on the Area 55 former operations pad and sediment sampling in the drainage downslope of Area 55.

- AME submitted to Whittaker on September 29, 1998 a draft technical memorandum report documenting results of completed field work proposed in technical memorandum *Additional Ground Water Investigation in the Vicinity of the Abandoned Highway Well Located in Area 75, Whittaker Corporation, Bermite Facility* dated February 25, 1998, as modified in the field and as conditionally approved by Cal-EPA on February 20, 1998.

- Conducted Former Area 317 Quarterly Ground Water Sampling on September 10, 1998.

- Collected ground water samples from Former Area 317 Monitoring Wells for perchlorate analysis on September 10, 1998.

Deviations From the Original Work Plans

None

Recommendations for Additional Work

Recommendations for Additional Work

None

Activities Anticipated for the Current Month (October 1998)

- AME conducted sediment sampling at four locations off site on October 1, 1998.
- AME will assist Cal-EPA to prepare final maps for DTSC Fact Sheet #3.
- Continue operation and monitoring of the vapor extraction system at the Former Area 317 Surface Impoundment.
- Prepare the Quarterly Ground Water Monitoring Report for the Former Area 317 Surface Impoundment.
- Prepare a letter report of analytical results for perchlorate in samples collected from Former Area 317 monitoring wells.
- Finalize the draft letter report documenting results of sediment samples collected August 18, 1998 at locations on site.
- Finalize the draft Area 55 report and prepare technical memorandum work plan to implement recommendations for additional investigation and mitigation of perchlorate at Area 55.
- Finalize the draft Area 75 report and prepare technical memorandum work plan for remediation of the abandoned highway well based on results of the Area 75 ground water investigation.

Activities Planned for the Next Calendar Month (November 1998)

- Continue operation and monitoring of the vapor extraction system at the Former Area 317 Surface Impoundment.
- Meet with Cal-EPA and representatives of local water purveyors on November 5, 1998.

Requirements of the Consent Order Not Completed

None

Problems and Corrective Actions

None

Findings of Sample Analysis and Other Tests

Laboratory analytical reports will be included in the previously referenced reports.

If you have any questions or comments, please call either of the undersigned at (916) 939-7550.

Very truly yours,

ACTON • MICKELSON • ENVIRONMENTAL, INC.

Robert P. Masterson, R.G.
California Registered Geologist #5080

Barbara J. Mickelson, P.E.
California Registered Professional Engineer #43417

RPM:BJM:dk

Enclosures

cc: Mr. Glen AbdunNur, Whittaker Corporation, Bermite Division
Ms. Lynne M. O. Brickner, Esq., Whittaker Corporation
Ms. Sayareh Amir, California Department of Toxic Substances Control
Ms. Mary Blevins, U.S. Environmental Protection Agency, Region IX
Mr. Thomas Cota, California Department of Toxic Substances Control
Mr. Tom Klinger, Los Angeles County Fire Department
Mr. Richard McJunkin, California Department of Toxic Substances Control

TABLE 1
Former Area 317 Surface Impoundment - Vapor Probe Measurements 1989 to Present

PROBE:	P1-20 @ 1441 ft OVA,	P1-40 @ 1421 ft OVA,	P1-60 @ 1401 ft OVA,	P1-80 @ 1381 ft OVA,	P1-100 @ 1361 ft OVA,	P1-120 @ 1341 ft OVA,	P2-20 @ 1440 ft OVA,	P2-40 @ 1420 ft OVA,	P2-60 @ 1400 ft OVA,	P2-80 @ 1380 ft OVA,	P2-100 @ 1360 ft OVA,	P2-120 @ 1340 ft OVA,	P3-20 @ 1440 ft OVA,	P3-40 @ 1420 ft OVA,	P3-60 @ 1400 ft OVA,	P3-80 @ 1380 ft OVA,	P3-100 @ 1360 ft OVA,	P3-120 @ 1340 ft OVA,	P4-60 @ 1398 ft OVA,	P4-120 @ 1338 ft OVA,	P5-60 @ 1400 ft OVA,	P5-100 @ 1360 ft OVA,	P6-30 @ 1476 ft OVA,	P6-63 @ 1443 ft OVA,	P7-30 @ 1484 ft OVA,	P7-57 @ 1454 ft OVA,	P8 @ 1331 ft OVA,	P9 @ 1336 ft OVA,	P10 @ 1333 ft OVA,	P11 @ 1321 ft OVA,	P12 @ 1332 ft OVA,	P13 @ 1338 ft OVA,	P14 @ 1332 ft OVA,	P15 @ 1333 ft OVA,	P16 @ 1286 ft OVA,	P17 @ 1298 ft OVA,	P18 @ 1252 ft OVA,
DATE:	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm
22-Mar-89	200	400	5,000	200	150	0	2,700	3,900	11,900	3,400	nm	55	350	300	200	600	350	50	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a
29-Mar-89	400	700	7,500	1,100	800	80	1,500	6,500	8,000	5,500	nm	230	400	900	850	700	230	210	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a
6-Apr-89	500	1,000	7,000	800	800	20	1,500	4,000	4,000	2,500	100	200	500	1,000	900	200	250	220	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a
13-Apr-89	1,200	2,000	8,000	1,200	900	600	4,800	7,500	9,000	5,000	700	250	1,000	2,000	1,500	850	240	170	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a
20-Apr-89	1,200	2,600	11,000	1,200	1,000	70	3,200	8,000	8,000	4,000	50	190	1,000	2,500	2,000	1,000	320	200	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a
5-May-89	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	700	15	50	110	25	160	50	110	nm	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a
14-Jun-89	1,800	4,000	10,000	1,600	800	150	4,000	8,000	7,000	3,500	800	200	2,500	4,000	4,000	1,500	400	250	5,000	nm	800	250	160	450	100	200	nm	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a
21-Jun-89	2,500	7,500	10,000	3,800	1,400	250	6,000	9,000	8,500	4,500	900	400	2,600	4,000	3,500	1,700	400	250	4,500	nm	1,000	300	200	450	140	200	nm	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a
28-Jun-89	900	2,000	16,000	1,100	750	450	2,500	3,000	2,500	1,500	400	100	2,900	5,000	4,500	1,500	400	100	6,000	nm	450	240	200	400	140	170	nm	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a
5-Jul-89	2,200	4,000	10,000	2,500	1,200	400	4,500	6,000	3,500	2,000	500	150	2,500	4,400	3,500	1,500	320	150	5,000	nm	600	250	200	500	150	170	nm	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a
19-Jul-89	250	500	1,500	2,700	1,500	400	8,000	12,000	9,000	4,000	1,500	350	4,000	6,000	6,000	2,000	500	400	4,500	nm	400	300	250	450	200	250	nm	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a
4-Aug-89	200	400	1,200	2,500	1,200	300	5,000	9,000	8,000	4,000	1,100	200	3,000	4,500	5,000	1,800	300	250	500	nm	350	200	250	600	180	200	nm	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a
10-Aug-89	220	300	1,000	2,200	1,100	250	4,000	7,500	7,000	3,500	900	200	2,500	4,000	3,500	1,500	270	250	7,000	nm	300	150	200	600	150	250	nm	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a
17-Aug-89	2,000	4,000	10,000	1,800	1,000	350	4,500	6,000	7,000	3,000	1,000	200	2,500	4,000	3,500	1,700	450	250	6,000	nm	400	1,000	250	400	350	50	nm	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a
24-Aug-89	2,200	4,000	9,000	1,600	900	300	4,000	6,500	7,000	2,800	900	200	2,000	4,000	4,000	1,500	1,000	220	6,500	nm	400	1,000	400	500	300	120	nm	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a
31-Aug-89	2,000	3,800	10,000	1,900	1,000	270	4,200	6,200	10,000	2,500	750	170	6,000	5,000	4,500	1,500	900	200	6,000	nm	300	900	300	450	250	150	nm	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a
8-Sep-89	1,700	4,000	9,000	1,500	900	300	9,000	11,000	12,000	5,000	1,600	200	4,000	6,000	6,000	2,500	650	100	6,000	nm	500	1,000	250	430	200	220	nm	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a
15-Sep-89	1,500	3,500	9,000	1,400	1,000	450	9,000	10,000	9,000	5,000	1,500	400	5,000	6,500	6,000	2,200	800	200	9,000	nm	400	1,200	300	500	400	250	nm	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a
27-Sep-89	1,700	4,000	11,000	1,200	900	350	10,000	10,000	9,000	4,500	1,400	400	4,500	6,000	7,000	2,000	700	250	9,000	nm	450	900	210	400	300	330	nm	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a
9-Oct-89	1,400	3,500	10,000	1,000	700	250	9,000	9,000	7,000	3,500	1,000	250	4,200	5,000	6,000	2,100	500	190	5,000	nm	350	500	200	320	200	150	nm	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a
18-Dec-89																																						
1-Jan-90																																						
1-Feb-90																																						
1-Mar-90																																						
1-Apr-90																																						
1-May-90																																						
1-Jun-90																																						
1-Jul-90																																						
1-Aug-90																																						
1-Sep-90																																						
1-Oct-90																																						
1-Nov-90																																						
18-Dec-90	1	0	4	1	11	450	3	195	160	16	35	6	0	4	600	15	17	16	2	nm	9	nm	0	4	0	1	nm	nm	nm	nm	nm	nm	nm	nm	nm	n/a	n/a	n/a
1-Jan-91																																						
20-Feb-91	0	0	0	0	2	0	0	40	3	0	3	0	0	0	45	0	2	0	0	nm	0	0	0	0	0	0	0	0	18	150	0	0	75	6	0	n/a	n/a	n/a
8-Mar-91	0	0	130	0	0	20	0	200	60	24	24	0	0	0	600	9	15	5	0	0	0	4	0	0	0	0	0	0	40	5	4	10	150	0	11	n/a	n/a	n/a
22-Mar-91	0	0	120	0	0	35	4	250	250	110	25	15	0	3	500	35	10	15	5	25	40	15	0	0	0	0	2	170	50	4	75	75	50	85	n/a	n/a	n/a
8-Apr-91	6	0	35	0	0	10	0	100	15	30	0	0	0	0	80	0	6	0	0	0	0	0	0	0	0	0	0	20	0	5	12	100	0	6	n/a	n/a	n/a
25-Apr-91	0	0	7	0	0	10	0	120	30	18	10	2	0	0	200	10	6	0	5	10	0	0	0	0	0	0	0	50	0	4	0	80	4	5	n/a	n/a	n/a
10-May-91	0	0	10	0	0	35	0	160	30	30	11	25	0	0	100	0	6	12	3	40	0	0	0	0	0	0	0	25	2	75	28	150	15	80	n/a	n/a	n/a
30-May-91	4	2	6	0	0	20	10	90	55	70	9	20	0	0	400	14	8	10	0	35	3	0	0	0	0	0	0	60	3	27	125	150	12	28	n/a	n/a	n/a
10-Jun-91	0	0	10	0	0	6	0	100	19	18	10	0	0	0	200	7	5	0	2	8	2	5	0	0	0	0	0	40	20	0	60	150	25	15	n/a	n/a	n/a
1-Jul-91																																						
1-Aug-91	0	0	3	0	0	9	3	90	100	70	12	3	0	0	110	3	3	0	0	2	0	0	0	0	0	0	0	3	14	0	35	90	3	7	n/a	n/a	n/a
15-Aug-91	0	0	2	0	0	0	0	40	3	3	5	0	0	0	40	1	4	0	0	0	0	0	0	0	0	0	0	10	80	0	15	80	1	7	n/a	n/a	n/a
29-Aug-91	0	0	3	0	0	2	0	0	0	0	4	0	0	0	23	0	2	0	0	0	0	0	0	0	0	0	0	4	0	0	9	70	2	4	n/a	n/a	n/a
12-Sep-91	0	0	110	4	6	0	0	60	12	12	8	0	0	0	4	0	0	0	0	0	0	0	0	0	0	0	0	8	60	0	10	70	0	6	n/a	n/a	n/a
26-Sep-91	0	0	4	0	0	2	0	20	0	0	2	0	0	0	30	0	2	0	0	0	0	0	0	0	0	0	0	4	0	0	8	50	2	2	n/a	n/a	n/a
24-Oct-91	0	0	3	0	0	2	0	30	4	3	6	0	0	0	50	3	4	0	0	0	0	0	0	0	0	0	0	12	18	2	20	180	4	10	n/a	n/a	n/a
1-Nov-91																																						
1-Dec-91																																						
1-Jan-92																																						
1-Feb-92																																						
18-Mar-92	9	12	80	25	20	45	7	80	22	38	30	1	1	1	180	50	25	0	28	35	40	30	0	1	1	2	0	140	120	55	800	200	35	45	n/a	n/a	n/a
1-Apr-92																																						
7-May-92	0	0	8	0	0	3	0	95	7	0	7	0	0	4	30	0	7	0	0	0	600	150	0	0	0	0	0	20	140	0	90	250	35	30	n/a	n/a	n/a
10-Jun-92	0	0	12	0	0	7	0	70	7	0	9	0	0	5	25	0	4	0	0	0	30	40	0	0	0	0	0	13	95	0	65	170	12	17	n/a	n/a	n/a
16-Jul-92	0	0	40	0	0	15	2	45	5	3	5	10	3	4	40	3	7	5	0	9	20	7	0	0	0	0	0	0	0	0	38	80	0	8	n/a	n/a	n/a
26-Aug-92	0	0	100	0	0	0	0	40	2	0	7	0	0	0	7	0	0	0	0	0	3	2	0	0	0	0	0	0	50	0	35	65	0	3	n/a	n/a	n/a
1-Sep-92																																						
15-Oct-92	0	0	35	0	0	0	0	25	4	0	7	0	0	0	15	0	4	0	0	0	3	5	0	0	0	0	0	0	0	0	45	90	4	0	n/a	n/a	n/a
4-Nov-92	0	0	80	0	0	15	0	15	0	0	4	0	0	0	4	0	4	0	0	0	0	0	0	0	0	0	0	4	60	0	40	70	5	7	n/a	n/a	n/a
3-Dec-92	3	1	20	0	0	18	0	15	14	9	4	24	5	3	30	6	7	9	20	40	9	5	0	0	0	0	1	12	6	40	80	50	50	50	n/a	n/a	n/a
1-Jan-93																																						
10-Feb-93	1	0	25	2	0	25	0	15	12	10	6	15	0	0	30	4	15	7	25	30	10	7	0	0	0	0	0	4	0	30	70	50	40	25	n/a	n/a	n/a
9-Mar-93	0	0	70	12	3	40	1	45	6	2	15	2	1	4	80	18	30	14	1	10	6	5	0	0	0	0	0	0	0	10	45	35	3	11	n/a	n/a	n/a
22-Apr-93	0	0	50	15	0	40	0	40	10	0	20	0	0	7	75	20	25	15	0	15	0	0	0	0	0	0	0	0	0	15	55	40	0	4	n/a	n/a	n/a
13-May-93	0	0	20	15	2	30	0	50	20	0	10	15	0	0	70	25	30	12	0	10	0	2	0	0	0	0	0	0	0	12	75	25	50	20	n/a	n/a	n/a
15-Jun-93	1	0	8	15	4	25	0	35	15	5	0	10	4	5	60	20	0	4	28	26	0	5	0	0	0	0	0	1	0	28	210	18	70	60	n/a	n/a	n/a
23-Jul-93	0	0	10	20	5	30	0	50	20	10	0	15	5	7	50	15	0	5	40	20	0	10	0	0	0	0	0	0	0	25	70	25	80	45	n/a	n/a	n/a
11-Aug-93	0	0	10	25	5	20	0	30	10	15	0	12	7	8	65	25	0	2	35	15	0	2	0	0	0	0	0	1	1	20	40	22	55	25	n/a	n/a	n/a
23-Sep-93	0	0	10	10	7	20	2	40	10	5	0	10	8	6	70	20	20	8	25	40	5	4	0	1	0	0	1	1	0	35	17	12	24	35	n/a	n/a	n/a
19-Oct-93	1	1	20	15	3	20	0	20	10	12	0	15	5	9	85	40	15	10	20	25	0	7	0	0	0	0	0	0	0	20	15	17	15	27	n/a	n/a	n/a
18-Nov-93	1	1	20	20	5	25	4	25	20	17	0	8	6	4	90	50	12	6	30	30	7	10	0	0	1	0	0	0	1	40	18	11	13	32	n/a	n/a	n/a
14-Dec-93	2	2	45	9	2	40	7	40	16	7	0	16	9	8	120	80	18	14	30	35	16	16	0	0	0	0	1	0	3	60	5	4	2	25	n/a	n/a	n/a
1-Jan-94																																						
23-Feb-94	1	0	12	1	0	3	0	16	4	1	0	0	0	0	50	12	10	0	0	2	10	9	0	0	0	0	0	4	1	6	4	18	5	30	n/a	n/a	n/a
31-Mar-94	2	0	25	4	1	3	0	25	6	3	0	0	4	3	50	20	2	0	9	3	3	6	0	0	0	0	0	10	1	25	7	30	4	70	n/a	n/a	n/a
29-Apr-94	2	1	20	4	0	4	0	20	5	2	0	0	2	3	45	15	0	0	5	0	3	20	0	0	0	0	0	10	4	15	7	25	7	50	n/a	n/a	n/a
1-May-94																																						
21-Jun-94	0	0	25	16	0	0	0	20	6	2	0	4	0	2	60	10	2	0	12	6	4	35	0	0	0	0	0	4	0	50	2	30	10	40	n/a	n/a	n/a
26-Jul-94	0	0	30	4	0	0	0	35	10	4	0	5	2	2	80	20	8	3	18	16	6	50	0	0	0	0	0	7	0	70	7	40	8	60	n/a	n/a	n/a
26-Aug-94	0	0	12	0	0	7	0	18	2	0	0	0	0	0	12	3	4	0	1	0	1	90	0	0	0	0	0	6	0	40	5	30	7	60	n/a	n/a	n/a
30-Sep-94	0	1	8	0	0	8	0	12	1	0	0	0	0	1	9	2	2	0	0	0	0	75	0	0	0	0	0	4	1	36	6	35	5	45	n/a	n/a	n/a
1-Oct-94																																						
1-Nov-94																																						
1-Dec-94																																						
1-Jan-95																																						
1-Feb-95																																						

TABLE 1
Former Area 317 Surface Impoundment - Vapor Probe Measurements 1989 to Present

PROBE: / DATE	P1-20 @ 1441 ft OVA, ppm	P1-40 @ 1421 ft OVA, ppm	P1-60 @ 1401 ft OVA, ppm	P1-80 @ 1381 ft OVA, ppm	P1-100 @ 1361 ft OVA, ppm	P1-120 @ 1341 ft OVA, ppm	P2-20 @ 1440 ft OVA, ppm	P2-40 @ 1420 ft OVA, ppm	P2-60 @ 1400 ft OVA, ppm	P2-80 @ 1380 ft OVA, ppm	P2-100 @ 1360 ft OVA, ppm	P2-120 @ 1340 ft OVA, ppm	P3-20 @ 1440 ft OVA, ppm	P3-40 @ 1420 ft OVA, ppm	P3-60 @ 1400 ft OVA, ppm	P3-80 @ 1380 ft OVA, ppm	P3-100 @ 1360 ft OVA, ppm	P3-120 @ 1340 ft OVA, ppm	P4-60 @ 1398 ft OVA, ppm	P4-120 @ 1338 ft OVA, ppm	P5-60 @ 1400 ft OVA, ppm	P5-100 @ 1360 ft OVA, ppm	P6-30 @ 1476 ft OVA, ppm	P6-63 @ 1443 ft OVA, ppm	P7-30 @ 1484 ft OVA, ppm	P7-57 @ 1454 ft OVA, ppm	P8 @ 1331 ft OVA, ppm	P9 @ 1336 ft OVA, ppm	P10 @ 1333 ft OVA, ppm	P11 @ 1321 ft OVA, ppm	P12 @ 1332 ft OVA, ppm	P13 @ 1338 ft OVA, ppm	P14 @ 1332 ft OVA, ppm	P15 @ 1333 ft OVA, ppm	P16 @ 1286 ft OVA, ppm	P17 @ 1298 ft OVA, ppm	P18 @ 1252 ft OVA, ppm
1-Mar-95																																					
1-Apr-95																																					
23-May-95	0	0	35	0	0	25	0	25	5	1	0	4	5	6	70	10	0	1	1	15	1	30	0	0	0	0	0	3	0	10	10	25	3	50	n/a	n/a	n/a
28-Jun-95	4	4	25	8	0	0	0	20	3	1	0	0	25	20	70	14	1	2	4	1	0	20	0	0	0	0	0	0	0	12	6	30	2	35	n/a	n/a	n/a
26-Jul-95	5	2	30	4	0	12	0	12	3	2	0	0	15	8	60	15	0	1	5	10	0	20	0	0	0	0	0	0	0	10	8	30	0	30	n/a	n/a	n/a
15-Aug-95	1	1	20	6	0	30	0	25	2	0	0	1	0	0	14	3	0	0	0	0	4	35	0	0	0	0	0	1	0	5	5	1	18	40	n/a	n/a	n/a
1-Sep-95																																					
10-Oct-95	0	1	35	6	0	18	0	16	0	3	0	0	0	4	10	0	1	3	3	0	2	20	0	0	0	0	0	0	0	4	10	15	6	30	n/a	n/a	n/a
1-Nov-95																																					
1-Dec-95																																					
1-Jan-96																																					
13-Feb-96	10	4	18	12	8	25	0	20	1	3	1	1	1	1	30	18	20	1	2	0	7	20	0	0	0	1	0	10	6	10	12	3	8	70	0	0	0
1-Mar-96																																					
25-Apr-96	3	6	25	18	25	150	6	35	40	5	5	50	10	8	240	14	25	60	8	40	4	25	0	0	0	0	4	10	3	100	15	4	5	200	50	0	0
29-May-96	1	2	30	20	28	220	0	30	2	0	0	15	1	1	60	3	1	5	2	25	7	35	0	0	0	0	1	9	0	50	25	4	3	180	0	1	1
1-Jun-96																																					
2-Jul-96	1	5	25	10	5	70	1	25	20	5	4	35	2	1	100	16	10	35	1	16	2	20	0	0	0	0	0	8	0	140	30	0	1	100	30	0	0
1-Aug-96	4	45	25	20	3	20	10	12	35	14	4	60	16	8	80	25	16	40	3	60	4	4	0	0	0	0	0	6	0	90	22	2	2	95	25	0	0
24-Sep-96	2	10	20	12	4	45	1	15	25	6	2	50	4	4	70	20	8	40	2	45	0	10	0	0	0	0	0	6	0	100	20	2	1	90	26	0	0
1-Oct-96																																					
19-Nov-96	3	18	40	20	15	20	4	15	30	22	2	5	2	2	100	70	25	2	10	8	18	75	0	0	0	0	0	9	0	35	10	1	5	50	0	0	0
1-Dec-96																																					
1-Jan-97																																					
13-Feb-97	0	8	60	65	30	90	1	2	1	0	0	1	2	1	4	0	1	30	1	0	0	250	0	0	0	0	0	5	0	4	7	0	0	45	0	0	0
5-Mar-97	2	5	28	20	20	3	1	6	1	1	0	0	0	0	3	1	1	0	0	0	1	250	0	0	0	0	0	4	0	3	5	0	0	40	0	0	0
8-Apr-97	0	6	14	7	7	10	2	2	2	1	0	1	0	0	8	0	0	0	0	0	0	80	0	0	0	0	0	4	0	6	8	1	1	50	0	0	0
28-May-97	0	9	7	4	4	15	0	1	2	0	0	5	0	1	8	0	0	4	0	3	0	60	0	0	0	0	0	3	1	20	4	5	1	50	0	0	0
26-Jun-97	2	4	8	7	12	75	0	2	18	6	35	0	5	10	5	3	4	13	220	18	4	200	0	0	0	0	8	9	3	200	25	18	2	130	9	2	1
1-Jul-97	5	30	40	35	70	90	3	12	250	40	3	8	1	1	10	5	1	2	130	7	2	60	2	1	1	1	3	5	7	70	35	25	3	100	2	1	1
19-Aug-97	7	16	43	55	45	17	9	22	35	65	1	2	4	8	100	90	8	2	8	2	0	170	0	0	0	0	0	7	1	21	11	23	1	100	0	0	0
30-Sep-97 [1]	50	90	140	150	180	190	40	80	100	200	15	100	2	10	350	450	80	150	250	100	80	450	0	0	0	0	12	25	0	400	50	12	60	250	150	4	0
31-Oct-97	0	70	110	100	150	200	10	35	75	280	10	120	4	8	350	750	35	100	350	95	90	500	0	0	0	0	9	8	0	500	25	10	80	150	50	0	0
1-Nov-97																																					
11-Dec-97 [2]	20	90	160	190	250	300	25	70	100	250	10	120	5	12	400	700	80	190	500	150	120	800	0	0	0	0	18	1	5	500	30	8	70	150	50	1	1
28-Jan-98	0	80	100	80	100	300	4	12	14	350	16	200	5	9	500	1,600	70	140	500	100	140	10	0	0	0	0	16	24	4	400	30	8	70	250	100	3	1
28-Feb-98	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm	nm
17-Mar-98	4	50	60	50	70	14	5	8	25	300	20	200	7	9	250	1,000	160	180	350	150	45	200	0	0	0	0	16	30	12	450	15	8	70	300	50	0	0
30-Apr-98	0	13	1	0	8	80	16	8	60	90	14	200	6	9	100	300	70	70	190	80	40	350	0	0	0	0	8	2	0	300	18	5	40	90	300	0	0
3-Jun-98	0	25	30	30	60	180	9	9	60	200	13	250	9	10	300	80	80	180	140	100	35	300	0	0	0	0	4	4	0	350	25	7	35	80	350	0	0
7-Jul-98	0	12	4	7	16	180	8	6	20	100	10	200	7	6	190	400	18	100	180	100	16	200	0	0	0	0	7	5	0	350	7	8	25	30	180	0	0
6-Aug-98	0	1	7	5	6	85	1	0	10	100	2	200	2	2	140	250	50	95	120	100	20	140	0	0	0	0	8	0	0	350	8	7	35	100	230	0	0
2-Sep-98	2	8	16	5	12	100	0	1	16	190	7	190	0	1	120	180	40	100	140	140	14	150	0	0	0	0	9	4	1	500	15	6	30	200	250	0	0
6-Oct-98	0	1	5	1	2	100	1	2	6	60	4	100	0	2	100	180	14	17	200	160	18	100	0	0	0	0	7	4	1	300	4	7	40	45	250	2	1

[1] Change in operating protocol, probes capped.
[2] New Cat-Ox installed and operated.

MUNGER, TOLLES & OLSON
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FREDERICK B. WARDER, JR.
(1932-1972)
MELVYN H. WALD
(1947-1992)

WRITER'S DIRECT LINE

(415) 512-4004

October 25, 1993

Mr. Steve Koyasako
Staff Attorney
Office of Legal Counsel
Department of Toxic Substances Control
400 P Street, 4th Floor
Post Office Box 806
Sacramento, California 95812-0806

Mr. Alan Sorsher
Department of Toxic Substances Control
1011 North Grandview Avenue
Glendale, California 91201

Re: Whittaker/Bermite

Dear Messrs. Koyasako and Sorsher:

Whittaker Corporation ("Whittaker") is submitting today, under separate cover, its report (hereinafter the "Report"), entitled "Response To Request For Information Regarding Potential Releases From Solid Waste Management Units" and prepared by Acton, Mickelson, van Dam, Inc. (AMV), responding to the Department of Toxic Substances Control's (DTSC's) recent request for information.

That request, dated July 21, 1993, seeks information regarding areas at the Bermite facility where solid wastes were managed or handled in any way, "including but not limited to storage or treatment in any manner, neutralization, dumping burning, burying (intentionally or accidentally, such as by landslide), leaching, any regular, systematic or repeated leaks,

spills or recurring discharge to areas that may have been 'investigated,' 'cleaned up' or otherwise remediated in the past." DTSC describes the information it has requested as information regarding solid waste management units (SWMUs) at the Bermite facility.

However, the information request is incompatible with the applicable state and federal regulatory definitions of a SWMU. Specifically, the request encompasses areas that would never be SWMUs under the promulgated regulations. Moreover, the request asks for information about areas far beyond the scope of SWMU information requests Whittaker previously received. It is unclear from what source or authority DTSC derived the "SWMU" definition it seeks to impose under the information request.

For example, state regulations define a SWMU as "any unit at a hazardous waste facility from which hazardous constituents might migrate, irrespective of whether the units were intended for the management of wastes, including but not limited to: containers, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators and underground injection wells." 22 C.C.R. § 66260.10. Thus, an area from which all waste was thought to have been removed would not present a risk of migration and therefore would not be SWMU under DTSC's own regulatory SWMU definition. The information request, however, is exceedingly more expansive than this published California definition or any other relevant SWMU definition.

Consequently, in submitting this response, Whittaker reserves all its rights, including its right to object to DTSC's request for information and its right to challenge the definition of a SWMU included in the request. Notwithstanding this reservation of rights, Whittaker has made every effort to respond fully to DTSC's request.

To ensure that preparation of the Report was in accordance with DTSC's expectations and to verify that Whittaker's interpretation of the request was accurate, Whittaker sought guidance from DTSC. DTSC informed Whittaker's environmental consultants by telephone that no formal guidance was available.

However, DTSC has provided informal guidance to Whittaker (through Whittaker's environmental consultant AMV) to assist Whittaker's preparation of the Report. For example, DTSC informed AMV that the request definition includes areas where any

solid waste, not just hazardous waste, was disposed in any way, including systematic spills, leaks, and intentional or unintentional discharges. In addition, AMV was referred to the 1987 RCRA Facility Assessment (RFA) Report concerning the Bermite facility, prepared by Science Applications International Corporation (SAIC) at EPA's request, to provide an example of the types of units that should be included in Whittaker's response.

In response to specific questions, AMV also was informed that: 1) areas where product was managed or handled were not included in the definition, unless a regular leakage of product occurred in that area; and 2) areas where oil wells were operated would not be included within the request definition.

While Whittaker has been informed by and relied upon this informal guidance, it has been forced to interpret and apply DTSC's definition in the absence of specific written guidance or precedent.

Whittaker identified areas at the Bermite facility falling within the broad reaches of DTSC's request by conducting a review of Whittaker's Bermite facility files. Where the historical documentation revealed that wastes were or may have been managed or handled in an area at Bermite, that area was included in an internal preliminary list. In the interest of the broadest possible disclosure, each of these areas has been included in the Report.

Depending upon the type and reliability of information available concerning a specific area, the area was categorized either as an "Identified Area," a "Possible Area" or as an "Investigated Area." An area was categorized as an "Identified Area" if there was reliable evidence that solid wastes were managed or handled in any way in that area. An area was categorized as a "Possible Area" if there was some indication from the documents that solid wastes may have been managed or handled in the area, but no investigation ever verified the information. An area was categorized as an "Investigated Area" if there was some indication that solid wastes were managed or handled in the area (e.g. rumors), but, after investigating the area, no physical evidence of such activity was found.

Finally, despite tremendous diligence, Whittaker cannot guarantee that every area where waste may have been handled or managed at the facility over the past century is included in the Report. There are limitations inherent in identifying areas at

an 80-year old facility that was shut-down and dismantled over six years ago. However, the Report does disclose all areas revealed by Whittaker's review of historical files. Should additional areas be discovered, Whittaker will notify DTSC.

Once DTSC has had the opportunity to review the Report, Whittaker would like to meet with the Department to discuss how to proceed at the Bermite facility. As you know, Whittaker seeks final closure of the facility. We look forward to hearing from you at your earliest convenience.

Sincerely,

Ronald C. Hausmann

Ronald C. Hausmann

/rms

cc: Mary Blevins ✓
Gordon Louttit

ACTON • MICKELSON • van DAM, INC.
Consulting Scientists, Engineers, and Geologists

5090 Robert J. Mathews Parkway, #4
El Dorado Hills, California 95762

(916) 939-7550
Fax (916) 939-7570

March 2, 1993

Mr. Alan Sorsher, P.E.
California Environmental Protection Agency
Department of Toxic Substances Control
1011 North Grandview Avenue
Glendale, California 91201

WHI01.20

Subject: Response to Recommendations in Report of Additional Hydrogeologic Assessment of the Area 342 Surface Impoundment, Whittaker Corporation, Bermite Division

Dear Mr. Sorsher:

The referenced report was submitted to the California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) on December 14, 1992. The additional hydrogeologic work performed and documented in this report was proposed in the "Specific Plan for the 342 Surface Impoundment Area" (Specific Plan) submitted to DTSC in September 1991 and subsequently approved by DTSC. In addition to requiring the additional hydrogeologic assessment described in the December 1992 report the Specific Plan required that an accelerated ground water monitoring schedule be implemented by Whittaker Corporation for Area 342. This accelerated monitoring plan called for a total of seven additional ground water monitoring events. The seven monitoring events required by the Specific Plan were completed in January 1993. The preparation of the summary report of the results of the January 1993 ground water monitoring event is underway. Prior to the approval of the Specific Plan, ground water quality monitoring had been ongoing in Area 342 involving monitoring well MW-2 since October 1988. The results of each ground water monitoring event conducted in Area 342 have been submitted to DTSC in technical reports prepared by Whittaker Corporation's consultants as summarized on Attachment 1.

The conclusions section of the December 1992 report stated that the data presented in the report provided a demonstration pursuant to California Code of Regulations, Title 22, Section 66265.98 "that a source other than the regulated unit caused the evidence of a release or that the indication evidence resulted from error in sampling, analyses, or evaluation, or from natural variation in ground water, surface water, or the unsaturated zone." Additionally, the recommendation section of the December 1992 report stated that "Following completion of monitoring in the first quarter of 1993, and with the approval of Cal-EPA, discontinue ground water monitoring

activities at Area 342". Acton • Mickelson • van Dam, Inc. (AMV) on behalf of Whittaker Corporation is requesting that DTSC approve the recommendation to discontinue monitoring activities at Area 342. The surface impoundment was removed in 1983 and Area 342 ground water quality monitored since 1988. Studies of the hydrogeology and geochemistry of the area indicate that the statistical evidence of a release reported in the routine technical ground water monitoring reports for Area 342 is not related to the former operation of the Area 342 Surface Impoundment. Given the data presented in the December 1992 report and the previous monitoring and assessment reports, further ground water monitoring will not enhance the data base nor provide additional information required to make the determination to certify clean closure of the former 342 Surface Impoundment Area. AMV requests on behalf of Whittaker Corporation that DTSC indicate their approval of the recommendation to discontinue ground water monitoring at Area 342 and that DTSC advise Whittaker Corporation of the timetable for final review of the December 1992 report. Following DTSC's review, if any questions remain with regard to the recommendations to plug and abandon the monitoring wells in Area 342, Whittaker Corporation will participate in a meeting to include its consultants and appropriate participants recommended by DTSC to answer DTSC's remaining questions.

Preparations for ground water monitoring events of the magnitude of those conducted in Area 342 take several weeks. Because of this lead time requirement, Whittaker Corporation is requesting that DTSC respond regarding discontinuation of ground water monitoring at Area 342 by March 19, 1993. Please call me at (916) 939-7550 if you have any questions regarding this report.

Sincerely,

ACTON • MICKELSON • van DAM, INC.

Barbara J Mickelson

Barbara J. Mickelson, P.E.

BJM:mjd
Enclosure

cc/enc: Mr. Edward Muller, Whittaker Corporation
Mr. Glen AbdunNur, Bermite Division
Mr. Tom Kelly, EPA Region IX
Mr. Jim Ross, Water Quality Control Board, Los Angeles Region
Mr. Brad Brian, Esq., Munger, Tolles & Olson

ATTACHMENT 1

The following documents have been submitted to California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) and U.S. EPA, Region IX, in fulfillment of the Closure Plan regarding ground water monitoring at Area 342:

- Whittaker Corporation, Bermite Division, Santa Clarita, CA CAD064573108, Facility Closure Plan Modifications, April 1987.
- Revised Ground Water Monitoring Plan for the 317/342 Area, October 8, 1987.
- Proposed Interim Status Ground Water Monitoring Sampling and Analysis Program, December 1987.
- Documentation Report--Construction and Development of Wells for Ground Water Monitoring of the 342 and 317 Areas, February 1988.
- Verification Sampling Results at Selected RCRA Units, March 1988.
- RCRA Ground Water Monitoring System--Proposed Final Configuration, May 1988.
- Ground Water Sampling and Analysis Plan, August 1988.
- RCRA Ground Water Sampling, Quarterly Sampling Report No. 1, December 1988.
- RCRA Ground Water Sampling, Quarterly Sampling Report No. 2, March 1989.
- RCRA Ground Water Sampling, Quarterly Sampling Report No. 3, July 1989.
- Specific Plan for a Ground Water Quality Assessment Program, June 1989.
- Interim Response Action Plan, 317 Area Soil and Ground Water Remediation, June 1989.
- Site Ground Water Sampling and Analysis Plan, Appendix IV of 40 CFR 264.
- RCRA Ground Water Sampling, Quarterly Sampling Report No. 4, September 1989.
- Statistical Analysis--Well MW-2 Versus MW-1 and MW-3, October 1989.
- RCRA Ground Water Sampling, Quarterly Sampling Report No. 5, March 1990.
- RCRA Ground Water Sampling, Quarterly Sampling Report No. 6, May 1990.

- RCRA Ground Water Sampling, Quarterly Sampling Report No. 7, June 1990.
- RCRA Ground Water Sampling, Quarterly Sampling Report No. 8, October 1990.
- RCRA Ground Water Sampling, Quarterly Sampling Report No. 9, January 1991.
- RCRA Ground Water Sampling, Quarterly Sampling Report No. 10, April 1991.
- RCRA Ground Water Sampling, Quarterly Sampling Report No. 11, July 1991.
- Specific Plan for a Ground Water Quality Assessment Program for the 317 Surface Impoundment Area.
- Specific Plan for a Ground Water Quality Assessment Program for the 342 Surface Impoundment Area.
- RCRA Ground Water Sampling, Quarterly Sampling Report No. 12, October 1991.
- RCRA Ground Water Sampling, Quarterly Sampling Report No. 13, January 1992.
- RCRA Ground Water Quality Monitoring Report, 342 Surface Impoundment Hazardous Waste Management Unit, January 1992.
- RCRA Ground Water Quality Monitoring Report, 342 Surface Impoundment Hazardous Waste Management Unit, February 1992.
- RCRA Ground Water Quality Monitoring Report, 342 Surface Impoundment Hazardous Waste Management Unit, March 1992.
- RCRA Ground Water Quality Monitoring Report, 342 Surface Impoundment Hazardous Waste Management Unit, April 1992.
- RCRA Ground Water Quality Monitoring Report, 342 Surface Impoundment Hazardous Waste Management Unit, July - September 1992.
- Additional Hydrogeologic Assessment of the 342 Surface Impoundment Area, December 1992.
- RCRA Ground Water Quality Monitoring Report, 342 Surface Impoundment Hazardous Waste Management Unit, October - December 1992.

Delta
Environmental
Consultants, Inc.

3330 Data Drive, Suite 100
Rancho Cordova, CA 95670
916/638-2085
FAX: 916/638-8385

November 12, 1990

Mr. Alan Sorsher
Toxic Substances Control Division
Department of Health Services
1405 North San Fernando Boulevard, Suite 300
Burbank, California 91504

Subject: **Bermite Division of Whittaker CAD# 064573108**

Dear Mr. Sorsher:

This letter is sent in confirmation of our telephone conversation on Thursday, November 8, 1990, during which it was agreed that appropriate representatives of DHS familiar with the referenced facility will be available to meet with Whittaker Corporation, Bermite Division personnel on Monday, November 19, 1990 at 1 p.m. at the Whittaker Bermite Facility on Soledad Canyon Road, Santa Clarita. Whittaker Corporation participants will be as stated in Mr. A. L. Simmons letter to Mr. Allan G. Plaza dated November 5, 1990.

It is Whittaker's intention that the meeting focus on Mr. Plaza's letter of October 26, 1990, with the objective of obtaining approval to proceed with the work described in the work plans submitted by Whittaker Corporation, Bermite Division on September 27, 1990.

Sincerely,

DELTA ENVIRONMENTAL CONSULTANTS, INC.

Barbara J. Mickelson

Barbara J. Mickelson, P.E.
California Registered Professional Engineer
Civil Engineer No. 43417

BJM:mjd

cc: Mr. A. L. Simmons, Consultant
Mr. Glen AbdunNur, Whittaker Corporation
Mr. Michael O'Brien, Delta Environmental Consultants, Inc.
Mr. Anastacio Medina, Los Angeles County Hazardous Waste Program
Mr. Andrew Hollbrook, Los Angeles Regional Water Quality Control Board
Mr. Edward Muller, Whittaker Corporation
Mr. David W. Hogan, City of Santa Clarita
Mr. Tom Kelly, U.S. Environmental Protection Agency, Region IX
Dr. Joe Riccio

Delta
Environmental
Consultants, Inc.

3330 Data Drive, Suite 100
Rancho Cordova, CA 95670
916/638-2085
FAX: 916/638-8385

October 29, 1990

Mr. Alan Sorsher
Toxic Substances Control Division
Department of Health Services
1405 North San Fernando Boulevard, Suite 300
Burbank, Caiifornia 91504

Subject: **Work Plans Submitted on September 27, 1990, in Response to Counts 1 and 14--Items 2 and 3a**

Dear Mr. Sorsher:

Delta Environmental Consultants, Inc. (Delta), on behalf of its client, Whittaker Corporation--Bermite Division (Whittaker), is requesting that the Department of Health Services (DHS) expedite review and approval of the referenced work plans. Whittaker and Delta are eager to implement the work detailed in the plans. Most importantly, implementation of the 317 area work plan will allow the lateral and vertical extent of the previously identified trichloroethane (TCE) contamination to be delineated. This delineation will allow further refinement of the ongoing remediation activities if appropriate.

Delta would welcome the opportunity to discuss these work plans or to answer any technical questions you may have so that we may obtain DHS approval to proceed as soon as possible.

Please call me at (916) 638-2085 if you have any questions regarding the work plans.

Sincerely,

DELTA ENVIRONMENTAL CONSULTANTS, INC.

Barbara J. Mickelson

Barbara J. Mickelson, P.E.
District Manager

BJM:mjd

cc: Mr. E. R. Muller, Whittaker Corporation
Mr. A. L. Simmons, Consultant
Mr. G. AbdunNur, Bermite Division, Whittaker Corporation
Mr. A. Medina, Los Angeles County Hazardous Waste Program
Mr. A. Hollbrook, Los Angeles Regional Water Quality Control Board
Mr. D. W. Hogan, City of Santa Clarita
Mr. T. Kelly, U.S. Environmental Protection Agency
Mr. B. Lewis, Toxics Substances Control Program, Department of Health Services

Al Simmons Env nmental - Safety Consult t Fax - (214) 783-2433
P.O. Box 708 Richardson, Texas 75080 Office - (214) 783-0533

November 5, 1990

Emery Worldwide Overnight #

Mr. Allan G. Plaza
Senior Waste Management Engineer
Department of Health Services
Toxic Substance Control Program
Region 3 1405 N. San Fernando Blvd. Suite 300
Burbank, CA 91504

RE: Bermite Division of Whittaker CAD# 064573108

Dear Mr. Plaza:

We are in receipt of your October 26, 1990 letter with attached memorandum from your Mr. Luis H. Ito to Mr. Larry L. Peterson and Mr. Alan Sorsher of your office.

We request a meeting with appropriate people on November 20, 1990 at approximately 9:00 A.M. at the Bermite Facility on Soledad Canyon Rd., Santa Clarita, CA. All of our records are there, and we would share these with your personnel, as they are too voluminous to transport.

As a courtesy I wish to advise you that Whittaker's Chief Administration Officer Mr. Edward Muller, Esq. will attend this meeting to represent the parent company as this situation is becoming a deep concern of everyone. We will also have our Registered Geologist and Certified Engineer present for this meeting. We would hope you would reciprocate with your personnel who are knowledgeable of this situation.

If this timing is agreeable please call Mr. Glen AbdunNur at 805-259-2241 and he will notify everyone concerned.

Yours truly,

Al Simmons

ALS/ts
Enclosures

cc: Mr. Micheal J. O'Brien
Mr. Anastacio Medina
Mr. Andrew Hollbrook
Mr. Edward Muller
Mr. David W. Hogan
Mr. Tom Kelly
Mr. P.C. Perterson
Ms. Barbra Mickelson
Mr. Joe Cippio

ANDEN

The Anden Group

15260 Ventura Boulevard, Suite 1700
Sherman Oaks, California 91403
(213) 872-0384 (818) 990-9148
FAX: (818) 986-7915

July 2, 1990

Mr. James Brietlow (H-1)
Section Chief RCRA
United States Environmental Protection Agency
215 Fremont Street
San Francisco, CA 94105

Re: Withdrawal of Revised Part A Application
for 22116 West Soledad Canyon Road
Saugus, California
EPA ID #CAD064573108

Dear Mr. Brietlow:

This letter is to inform you that Anden Santa Clarita Partners, L.P., hereby withdraws its Revised Part A Application regarding the planned transfer of Whittaker Corporation's Bermite Property to Anden Santa Clarita Partners, L.P. The revised Part A Application was previously delivered to the Environmental Protection Agency, by letter of February 26, 1990. The planned transfer of ownership will not be taking place.

We apologize for the inconvenience of withdrawing the Application at this time. However, as you know, 40 CFR §270.70(d) and Title 22, California Code of Regulations, §66389(b)(4) required us to give the Department of Health Services and Environmental Protection Agency notice prior to the proposed change of ownership. During the period between the required notice and the proposed transfer, for several reasons plans for the transfer were abandoned. Accordingly, neither Anden Santa Clarita Partners, L.P., the proposed transferee, nor The Anden Group, a California Limited Partnership which was its

ANDEN

general partner, ever succeeded to ownership or control of the Bermite Property.

Thank you for your courtesy in this matter.

Very truly yours,

Bruce W. Gladish

BRUCE W. GLADISH

cc: Mr. Scott Simpson
Surveillance and Enforcement

Mr. Anastacio Medina
L.A. County Haz. Waste Program

Mr. David W. Hogan, Ass't Planner
City of Santa Clarita

Mr. Gordon Louttit, Vice President
Whittaker Corporation

Mr. Paul Blais
Hazardous Waste Management Unit
Toxic Substances Control Program

Ms. Lucille Van Omerring
Financial Responsibility Unit
Toxic Substances Control Program

Mr. Dennis A. Dickerson
Toxic Substances Control Program

ANDEN

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July 2, 1990

Mr. Dennis A. Dickerson
State Department of Health Services
Toxic Substances Control Program
1405 North San Fernando Road
Suite 300
Burbank, CA 91504

Re: Withdrawal of Revised Part A Application
for 22116 West Soledad Canyon Road
Saugus, California
EPA ID #CAD064573108

Dear Mr. Dickerson:

This letter is to inform you that Anden Santa Clarita Partners, L.P., hereby withdraws its revised Part A Application regarding the planned transfer of Whittaker Corporation's Bermite Property to Anden Santa Clarita Partners, L.P. The revised Part A Application was previously delivered to the Department of Health Services by letter of February 26, 1990, and was resubmitted to you on March 22, 1990. The planned transfer of ownership will not be taking place.

We apologize for the inconvenience of withdrawing the Application at this time. However, as you know, 40 CFR §270.70(d) and Title 22, California Code of Regulations, §66389(b)(4) required us to give the Department of Health Services and Environmental Protection Agency notice prior to the proposed change of ownership. During the time between the required notice and the proposed transfer, for several reasons plans for the transfer were abandoned. Accordingly, neither Anden Santa Clarita Partners, L.P., the proposed transferee, nor

ANDEN

The Anden Group, a California Limited Partnership which was its general partner, ever succeeded to ownership or control of the Bermite Property.

Thank you for your courtesy in this matter.

Very truly yours,

Bruce W. Gladish

BRUCE W. GLADISH

cc: Mr. Scott Simpson
Surveillance and Enforcement
Region 3

Mr. Anastacio Medina
LA County Haz. Waste Program

Mr. David W. Hogan,Ass't Planner
City of Santa Clarita

Mr. Gordon Louttit, Vice President
Whittaker Corporation

Mr. Paul Blais
Hazardous Waste Management Unit
Toxic Substances Control Program

Ms. Lucille Van Omerring
Financial Responsibility Unit
Toxic Substances Control Program

Mr. James Breitlow
U.S. EPA, Region IX

Wenck Associates, Inc.

Consulting Engineers
(612) 479-4200

April 26, 1990

Mr. Alan Sorsher
Department of Health Services
Toxic Substances Control Division
1405 No. San Fernando Blvd., Suite 300
Burbank, CA 91504

Re: Hydrogeologic Assessment
Bermite Division, Whittaker Corporation

Dear Mr. Sorsher:

As you are aware we are in the process of completing the Hydrogeologic Assessment for the Bermite Division of Whittaker Corporation. We have been finalizing this document and had planned to submit the document for your review and approval this week. We have today determined the existence of at least two former exploratory oil wells in the vicinity of both the 317 Area and the 342 Area. We have requested the well logs and associated material regarding these wells and expect this information within the next week. We feel that this information is very important to the Hydrogeologic Assessment and are therefore advising you that we will submit the Hydrogeologic Assessment Report the week of May 14, 1990.

Alan, if you have any questions regarding this correspondence, please do not hesitate to call Mr. Al Simmons at 214-783-0533, Mr. Glen Abdun Nur at 805-259-2241 or me at 612-479-4205. Thank you for your consideration of this matter.

Sincerely,

WENCK ASSOCIATES, INC.

Christopher F. Thompson, P.E.

CFT/aec

cc: Mr. Al Simmons
Mr. Glen Abdun Nur, Bermite
Ms. Jan Palumbo, EPA Region IX

1800 Pioneer Creek Dr.
Maple Plain, MN 55359
FAX - (612) 479-4242

L. DAVID COLE
A LAW CORPORATION
SUITE 800
9601 WILSHIRE BOULEVARD
BEVERLY HILLS, CALIFORNIA 90210-5270
(213) 274-4844
FACSIMILE (213) 274-8421

February 26, 1990

Mr. James Brietlow (H-1)
Section Chief
RCRA
United States Environmental
Protection Agency
215 Fremont Street
San Francisco, CA 91405

Re: Revised Part A Application for
22116 West Soledad Canyon Road,
Saugus, California
EPA I.D. No. CAD064573108

Dear Mr. Hinton:

We represent Anden Santa Clarita Partners, L.P. (the "Partnership"), and its general partner, The Anden Group, a California Limited Partnership ("Anden"). Anden has recently agreed to form the Partnership with Whittaker Corporation ("Whittaker") as the limited partner. Upon the formation of the Partnership, the Partnership Agreement contemplates that, following certain reviews and approvals by Anden, certain real property generally located at 22116 West Soledad Canyon Road in Saugus, California, will be conveyed by Whittaker to the Partnership, on or about March 13, 1990.

In accordance with the provisions of Section 66389(b)(4) of Title 22 of the California Code of Regulations and 40 C.F.R. 270.72, the Partnership is submitting the enclosed Revised Part A Application for the facility.

We are submitting this Revised Part A Application on behalf of the Partnership in anticipation of the agreed conveyance of the Property to the Partnership, following Anden's review and approval of various matters; upon that conveyance the Partnership will become the new owner of the facility.

Wenck Associates, Inc.

Consulting Engineers
(612) 475-0858
FAX – (612) 476-0504

December 11, 1989

Mr. Alan Sorsher
Department of Health Services
Toxic Substances Control Division
1405 No. San Fernando Blvd., Suite 300
Burbank, CA 91504

Re: Monthly Progress Report No. 24
Implementation of Revised RCRA Closure Plan
Bermite Division, Whittaker Corporation
November 1989

Dear Mr. Sorsher:

The RCRA closure activities completed during the month of November included work on the vapor extraction system at the 317 Area, final closure of some of the RCRA units and the additional work on run-on/run-off protection at the 317 Area.

The permit to construct and operate the vapor extraction wells and vapor treatment system has been received from the South Coast Air Quality Management District.

Whittaker Corporation has received acknowledgement, dated November 28, 1989 from the EPA, of clean closure of the six (6) RCRA units (E1, E2, E3, 502, 504 and 506). In addition, acknowledgement, dated November 3, 1989, of the modified Part A application was received from DHS and EPA. In concurrence with the acknowledgement, the treated groundwater and groundwater treatment filters (granular activated carbon) will not be subject to the requirements set forth in the acknowledgement because an NPDES permit for discharge of the treated groundwater has been issued.

Further measures for rainfall run-on and run-off protection at the 317 Area have been implemented. The bottom of the excavation at the 317 Area has been capped with a 3-inch cover of asphalt.

The laboratory reports from the fifth quarterly groundwater sampling event have been received and are being reviewed and tabulated. The quarterly report will be submitted during the next period.

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FAX – (612) 476-0504

October 31, 1989

Mr. Alan Sorsher
Department of Health Services
Toxic Substances Control Division
1405 No. San Fernando Blvd., Suite 300
Burbank, CA 91504

Re: Monthly Progress Report No. 23
Implementation of Revised RCRA Closure Plan
Bermite Division, Whittaker Corporation
October 1989

Dear Mr. Sorsher:

The RCRA closure activities completed during the month of October included work on the groundwater at the 317 Area, work on the vapor extraction system at the 317 Area, and final closure of the RCRA units 223, 236, and the Lead Azide Area.

A statistical analysis of the groundwater results for the first year of quarterly groundwater sampling was submitted. You have indicated that, as a result of this analysis and further review of the groundwater monitoring system at Bermite by DHS personnel, the modified sampling plan for the RCRA wells, as indicated in our letter of September 13, 1989, is approved with slight modifications. It is our understanding that on a quarterly basis the monitoring wells will be sampled and analyzed as follows: Monitoring Wells 1, 2, and 3 will be sampled for sulfates, chlorides, and the four indicator parameters: pH, specific conductance, TOC, and TOX. In addition, a dissolved metal scan by inductively coupled plasma (ICP) will be performed on samples from these three wells. Monitoring Wells 4, 5, and 6 will be sampled for the four indicator parameters listed above and for the presence of volatile organic compounds by EPA Method 624.

In accordance with the revised sampling plan for the groundwater monitoring wells at the 317 Area, we have completed the fifth quarterly sampling event on October 30 and 31, 1989. We will forward the fifth quarterly sampling report upon receipt of the laboratory analytical results.

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In accordance with approval from the RWQCB, Monitoring Well MW-4 has been pumping continuously in order to provide gradient control of the groundwater in the vicinity of this well. The NPDES Permit for discharge of this pumped and treated water has been approved by the RWQCB and we are sampling and analyzing in accordance with that permit. As expected, the groundwater once treated by a granular activated carbon does not contain detectable levels of the volatile organic compounds.

The in-situ vapor extraction system at the 317 Area has been completed, including the receipt of the activated carbon column and plumbing of the columns, the blower and the vents. The pilot test of this system will be performed as soon as the necessary permit from the South Coast Air Quality Management District (SCAQMD) is received. Although it has been more than four months since application to the SCAQMD, we have still not yet received the permit contrary to indications from the SCAQMD.

At your request, we have revised the Certification of Closure Report for the RCRA Units 223, 236 and the Lead Azide Area. You have indicated that the DHS Certification of Clean Closure for these three RCRA units is forthcoming.

If you have any questions regarding this report or the closure activities at Bermite, please do not hesitate to call Norm Wenck or me at (612) 475-0858.

Sincerely,

WENCK ASSOCIATES, INC.

Chris Thompson aec

Christopher F. Thompson, P.E.

CFT/aec

cc: Edward Muller, Whittaker
Al Simmons, Whittaker
Glen Abdun Nur, Bermite
Marsha Croninger, Jones, Day, Reavis & Pogue
Jan Palumbo, EPA Region IX
Jim Ross, RWQCB

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October 6, 1989

Mr. Alan Sorsher
Department of Health Services
Toxic Substances Control Division
1405 No. San Fernando Blvd., Suite 300
Burbank, CA 91504

Re: Bermite Division, Whittaker Corporation

Dear Mr. Sorsher:

Enclosed please find two different reports submitted for your review and approval. These reports have been prepared in fulfillment of the RCRA closure requirements at the Bermite Division, Whittaker Corporation.

The first report "Construction of Vapor Extraction Vents and Vapor Probe Nests at 317 Area", dated September 1989, provides up-to-date vapor probe monitoring of the extent of VOC contamination in the soils at the 317 Area.

The second report "Construction and Analysis of Gradient Control Well PW-1 and RCRA Groundwater Monitoring Wells MW-5 and MW-6", dated September 1989, provides documentation of the construction of the recently installed monitoring wells and gradient control well. This report also includes analytical results from wells MW-5 and MW-6. No VOCs are detectable in these wells.

If you have any questions regarding these reports, please do not hesitate to call Mr. Norm Wenck or me at (612) 475-0858.

Sincerely,

WENCK ASSOCIATES, INC.

Christopher F. Thompson, P.E.

CFT/aec
Enclosures

cc: Al Simmons, Whittaker
Glen Abdun Nur, Bermite
Jan Palumbo, EPA Region IX
Jim Ross, RWQCB

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October 2, 1989

Mr. Alan Sorsher
Department of Health Services
Toxic Substances Control Division III
1405 No. San Fernando Blvd., Suite 300
Burbank, CA 91504

Re: Monthly Progress Report No. 22
Implementation of Revised RCRA Closure Plan
Bermite Division, Whittaker Corporation
September 1989

Dear Mr. Sorsher:

The RCRA closure activities completed during the month of September included continued follow-up on NPDES and vapor extraction permits.

The draft NPDES permit application was reviewed at the September 25, 1989 Board meeting. The permit was approved and the final permit documents are expected in approximately two weeks. We have been pumping groundwater from well MW-4, cleaning it with granular activated carbon and, after analysis to verify the absence of VOC, have been discharging this pumped water. These activities are in accordance with DHS and EPA instructions.

The air quality permit to construct and operate the vapor extraction system at the 317 Area is still in the final stages of review at the South Coast Air Quality Management District (SCAQMD). When the permit is received, we expect to immediately commence with the vapor extraction pilot test.

You were sent three reports during this period: "RCRA Groundwater Sampling, Quarterly Sampling Report No. 4", September 1989; "Health Risk Assessment, Three RCRA Units: Burn Area, Burn Cage, Pans and Rails Area and East Fork Area", September 1989; and "Health Risk Assessment, 317 Area", September 1989.

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Two additional reports are forthcoming in the next few days: "Construction of Vapor Extraction Vents and Vapor Probe Nests at 317 Area" and "Construction and Analysis of Gradient Control Well PW-1 and RCRA Groundwater Monitoring Wells MW-5 and MW-6".

If you have any questions regarding this report or the closure activities at Bermite, please do not hesitate to call Norm Wenck or me at (612) 475-0858.

Respectfully submitted,

WENCK ASSOCIATES, INC.

Christopher F. Thompson, P.E.

CFT/aec

cc: Al Simmons, Whittaker
Glen Abdun Nur, Bermite
Marsha Croninger, Jones, Day, Reavis & Pogue
Jan Palumbo, EPA Region IX
Jim Ross, RWQCB

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September 13, 1989

Mr. Alan Sorsher
Department of Health Services
Toxic Substances Control Division III
1405 No. San Fernando Blvd., Suite 300
Burbank, CA 91504

Re: RCRA Groundwater Sampling and Analysis
Bermite Division, Whittaker Corporation

Dear Mr. Sorsher:

The fourth quarterly sampling of the RCRA groundwater monitoring wells was completed on July 26 and 27, 1989. We are compiling the analytical results and as I indicated to you in August, we will be submitting the quarterly report to DHS and EPA prior to September 25, 1989. As you are aware from conversations with Bermite and Wenck personnel the analytical results of the fourth sampling event are very similar to those of the third sampling event except that the concentration of trichloroethylene (TCE) in well MW-4 has decreased approximately 80 percent.

In addition to the quarterly sampling report, we will soon be submitting a documentation report of the construction of the new RCRA groundwater monitoring wells MW-5 and MW-6. This report will also include details of the construction of the gradient control well installed at the 317 Area.

Wells MW-5 and MW-6 were installed as a result of the detection of TCE in well MW-4 and in accordance with 40 CFR 265.93 (d)(1). Details of the placement of the new wells were provided in "Specific Plan, Groundwater Quality Assessment Program", June 1989.

Preliminary sampling and analysis of the groundwater at wells MW-5 and MW-6 has not detected any volatile organic compounds.

In accordance with 40 CFR 265.91 and 40 CFR 265.92, one year of groundwater detection monitoring will be complete upon submittal of the fourth quarterly sampling report. In accordance with 40 CFR 265.92 (d)(1) and 40 CFR 265.92 (d)(2) the sampling and analysis frequency for the majority of the parameters that have been analyzed for the four quarters will be reduced. The

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groundwater quality parameters are required annually and the groundwater contamination parameters are required semi-annually. The specific analytes and their sampling and analysis frequency are presented in the attached Table 1. The future dates of sampling are also presented in Table 1.

In accordance with 40 CFR 265.93 (d)(7)(i), sampling and analysis for assessing the known hazardous constituents will continue on a quarterly basis. Analysis for chlorinated organics will be performed on each of the six RCRA groundwater monitoring wells as indicated in the attached Table 1. It is proposed that the analysis be performed by EPA Method 601 as opposed to EPA Method 624. This is the same analysis now being performed on the pumped and treated groundwater from the 317 Area in accordance with "Interim Response Action Plan, 317 Area Soil and Groundwater Remediation", June 1989.

Mr. Sorsher, we request that you review this letter and concur with us as to the change in frequency of the sampling and analysis and the change in analytical method for the chlorinated organic compounds.

If you have any questions or would like to discuss this matter further please call Mr. Norm Wenck or me at (612) 475-0858. Thank you for you attention to this matter.

Sincerely,

WENCK ASSOCIATES, INC.

Christopher F. Thompson, P.E.

Attachment
cc: Mr. Al Simmons, Whittaker
Mr. Glen Abdun Nur, Bermite
Mr. Jim Ross, RWQCB
Ms. Jan Palumbo, USEPA Region IX

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TABLE I

GROUNDWATER SAMPLING AND ANALYSIS SCHEDULE - ASSESSMENT MONITORING

BERMITE DIVISION, WHITTAKER CORPORATION

Groundwater Quality Parameters Required Annually:

Parameter	Analysis Method
Iron	EPA 7380
Manganese	EPA 7460
Sulfate	EPA 9035
Sodium	EPA 7770
Nitrate	EPA 9200
Total Phosphate	Std. Method 424F
Fluoride	Std. Method 413B
Phenols	EPA 8040
Pesticides	EPA 8080/8150
Radium	EPA 9315
Gross Alpha/Beta	EPA 9310
Coliform Bacteria	EPA 9131
Arsenic	EPA 7060
Barium	EPA 7080
Cadmium	EPA 7130
Chromium	EPA 7190
Lead	EPA 7420
Mercury	EPA 7470
Selenium	EPA 7740
Silver	EPA 7760

Groundwater Contamination Indicator Parameters Required Semi-Annually:

Parameter	Analysis Method
pH	EPA 9040
Specific Conductance	EPA 9050
Total Organic Carbon (TOC)	EPA 9060
Total Organic Halides (TOX)	EPA 9020

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TABLE I (cont'd)

GROUNDWATER SAMPLING AND ANALYSIS SCHEDULE - ASSESSMENT MONITORING

BERMITE DIVISION, WHITTAKER CORPORATION

Hazardous Waste Constituents Required Quarterly:

Parameter	Analysis Method
Chlorinated Volatile Organics	EPA 601

Future Dates of Sampling and Analysis:

October 1989	Quarterly Sampling and Analysis
January 1990	Quarterly/Semi-Annual Sampling and Analysis
April 1990	Quarterly Sampling and Analysis
July 1990	Quarterly/Annual Sampling and Analysis
October 1990	Quarterly Sampling and Analysis

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Wenck Associates, Inc.

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July 21, 1989

Mr. Alan Sorsher
Department of Health Services
Toxic Substances Control Division III
1405 North San Fernando Boulevard, Suite 300
Burbank, California 91504

Re: Progress Report No. 19
Implementation of Revised RCRA Closure Plan
Bermite Division, Whittaker Corporation
Week of July 17, 1989

Dear Mr. Sorsher:

Monitoring well MW-5 has been completed and developed. The Hydrostar® piston pumps have been received and installed in monitoring wells MW-1, MW-5 and MW-6. The drive motors for these pumps have not yet been received, however. The motor for well MW-1 will arrive and be installed next week.

The fourth RCRA quarterly groundwater sampling event will be started next Tuesday, July 25, 1989. Monitoring wells MW-5 and MW-6 will not be included.

If you have any questions regarding this report or the closure activities at Bermite, please do not hesitate to call Norm Wenck or me at (612) 475-0858.

Respectfully submitted,

WENCK ASSOCIATES, INC.

Christopher F. Thompson, P.E.

CFT/aec
Enclosure

cc: Gordon Louttit, Whittaker
John Peloquin, Bermite
Glen Abdun Nur, Bermite
Marsha Croninger, Jones, Day, Reavis & Pogue
Jeff Scott, EPA Region IX
Jim Ross, RWQCB

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Wayzata, MN 55391-1418

Wenck Associates, Inc.

July 14, 1989

Consulting Engineers
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Mr. Alan Sorsher
Department of Health Services
Toxic Substances Control Division III
1405 North San Fernando Boulevard, Suite 300
Burbank, California 91504

Re: Progress Report No. 18
Implementation of Revised RCRA Closure Plan
Bermite Division, Whittaker Corporation
July 3 through July 14, 1989

Dear Mr. Sorsher:

Pursuant to our letter to the Department of Health Services dated June 15, 1989, we will again be providing you with weekly progress reports regarding the RCRA closure activities at Bermite. The report number referenced above is a continuation of the progress report numbers from previous reports, the last of which was dated August 25, 1988.

Please find enclosed the "RCRA Groundwater Sampling, Quarterly Sampling Report No. 3", July 1989. This report presents the results of the April 1989 quarterly sampling of the RCRA monitoring wells MW-1, MW-2, MW-3, and MW-4.

As discussed and agreed upon in our meeting on June 13, 1989, two additional groundwater monitoring wells, MW-5 and MW-6, are being completed near the 317 Area. The wells are both 4-inch diameter with 20 foot long stainless steel screens. As of today well MW-6 has been constructed and developed. Well MW-5 is being completed today and will be developed next week.

The Hydrostar® piston pumps are on order and will be arriving soon. Three pumps have been ordered, one each for the new wells and one to replace the Grundfos pump in well MW-1. Depending on when the new pumps are

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Wenck Associates, Inc.

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received and completion of installation of the pumps, wells MW-5 and MW-6 may be included in the next RCRA groundwater quarterly sampling event.

A groundwater pumpout well has been installed at the 317 Area. A granular activated carbon filter has been installed on the discharge of this well. Upon approval for disposal of the treated groundwater, we will begin groundwater remediation.

The two initial vapor extraction vents have been completed in the subsurface soils at the 317 Area. A permit to construct and operate the vapor extraction system has been applied for to the South Coast Air Quality Management District.

If you have any questions regarding this report or the closure activities at Bermite, please do not hesitate to call Norm Wenck or me at (612) 475-0858.

Respectfully submitted,

WENCK ASSOCIATES, INC.

Christopher F. Thompson, P.E.

CFT/cmk
Enclosure

cc: Gordon Louttit, Whittaker
John Peloquin, Bermite
Glen Abdun Nur, Bermite
Marsha Croninger, Jones, Day, Reavis & Pogue
Jeff Scott, EPA Region IX
Jim Ross, RWQCB

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Wenck Associates, Inc.
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May 24, 1989

Regional Administrator
ATTN: Jeff Scott
U.S. EPA Region IX
215 Fremont Street
San Francisco, CA 94105

Re: EPA #CAD 064573108
Bermite Division, Saugus, California

Dear Mr. Scott:

The attached letter is our notification required under 40 CFR 265.93(d)(1). We are preparing a specific plan for a groundwater quality assessment program as required by 40 CFR 265.93(d)(2). This plan will be submitted to you within the required 15 days.

Please contact me if you have any questions on this matter.

Sincerely,

WENCK ASSOCIATES, INC.

Norman C. Wenck, P.E.
President

NCW/cmk
Attachment

832 Twelve Oaks Center
15500 Wayzata Blvd.
Wayzata, MN 55391-1418

Wenck Associates, Inc.

May 19, 1989

Consulting Engineers
(612) 475-0858
FAX – (612) 476-0504

Mr. Alan Sorsher
Department of Health Services
Toxic Substances Control Division III
1405 North San Fernando Boulevard, Suite 300
Burbank, California 91504

Re: Groundwater Investigation at 317 Area
Bermite Division, Whittaker Corporation

Dear Mr. Sorsher:

The most recent groundwater sampling event was completed between April 17 and April 19, 1989. While not all analytical results have been received from the laboratories, we have received the results for the volatile organic compounds. All of the four monitoring wells show non-detectable concentrations of the compounds analyzed except monitoring well MW-4. This well is located downgradient and adjacent to the 317 Area. Trichloroethylene (TCE) was detected at a concentration of 4.8 mg/l in MW-4. A copy of the laboratory report is attached for your review. This was the first time in more than one year of sampling that organic compounds have been detected in any of the four groundwater monitoring wells. In an effort to verify this unexpected result, monitoring well MW-4 was resampled for volatile organic compounds. The well was purged and sampled in accordance with the sampling and analysis plan. The sample was submitted to a different laboratory than normally used for the groundwater analyses for Bermite. This laboratory (West Coast Analytical) has confirmed the presence of TCE in MW-4 at a concentration of 7.2 mg/l (see laboratory report, attached).

As a result of the recent detection of TCE, we are proceeding with the installation of a groundwater recovery well. The well will be installed in a location between monitoring well MW-4 and the 317 Area. The well location will be surveyed and we will provide you with an accurate location map when the information is available.

The recovery well will be screened from an elevation of approximately 863 feet to 813 feet with a six inch diameter, 0.06 slot screen and cased with a six inch steel casing.

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The well will be developed by airlifting and surging.

At this time, our plan is to install the well and perform a pumping test to determine appropriate aquifer characteristics. We will then develop a program for groundwater removal and treatment.

If you have any questions regarding these matters, please do not hesitate to call.

Sincerely,

WENCK ASSOCIATES, INC.

Christopher F. Thompson, P.E.

CFT/cmk

cc: Gordon Louttit - Whittaker
Glen Abdun Nur - Bermite
Michael Fernandez - EPA Region IX

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April 13, 1989

Mr. Alan Sorsher
Department of Health Services
Toxic Substances Control Division III
1405 North San Fernando Blvd. Suite 300
Burbank, CA 91504

Re: **Phase II Vapor Probe Installation at the 317 Area, Bermite Division Whittaker Corporation**

Dear Mr. Sorsher:

In response to our meeting with you on April 7, 1989 at your office, we are confirming your requirement to install additional vapor probes at the 317 area. These Phase II vapor probes will be installed in an effort to determine the vertical extent of soils containing volatile organic compounds (VOC's).

The attached Figure 1 shows the locations of the initial vapor probes and proposed location for the Phase II vapor probes. Two probe nests will be installed with multiple vapor probes in each nest, similar to the initial vapor probe nests. Probe nest P4 will be located adjacent to nest P1. Probe nest P5 will be located approximately 50 feet south of nest P1.

The attached Figure 2 shows a cross-section of the subsurface soils at the 317 area and the depths at which the Phase II vapor probes will be placed. The six (6) vapor probes in nest P4 will be placed at 20 foot intervals beginning at a depth of 140 feet below the existing ground surface. The five (5) vapor probes in nest P5 will be placed at depths below the existing ground surface of 60-, 120-, 160-, 200- and 240-feet.

The Phase II vapor probes will be constructed in the same manner as the initial vapor probes. Details of this construction are contained in the "Subsurface Vapor Probe Plan at the 317 Area", February 1989.

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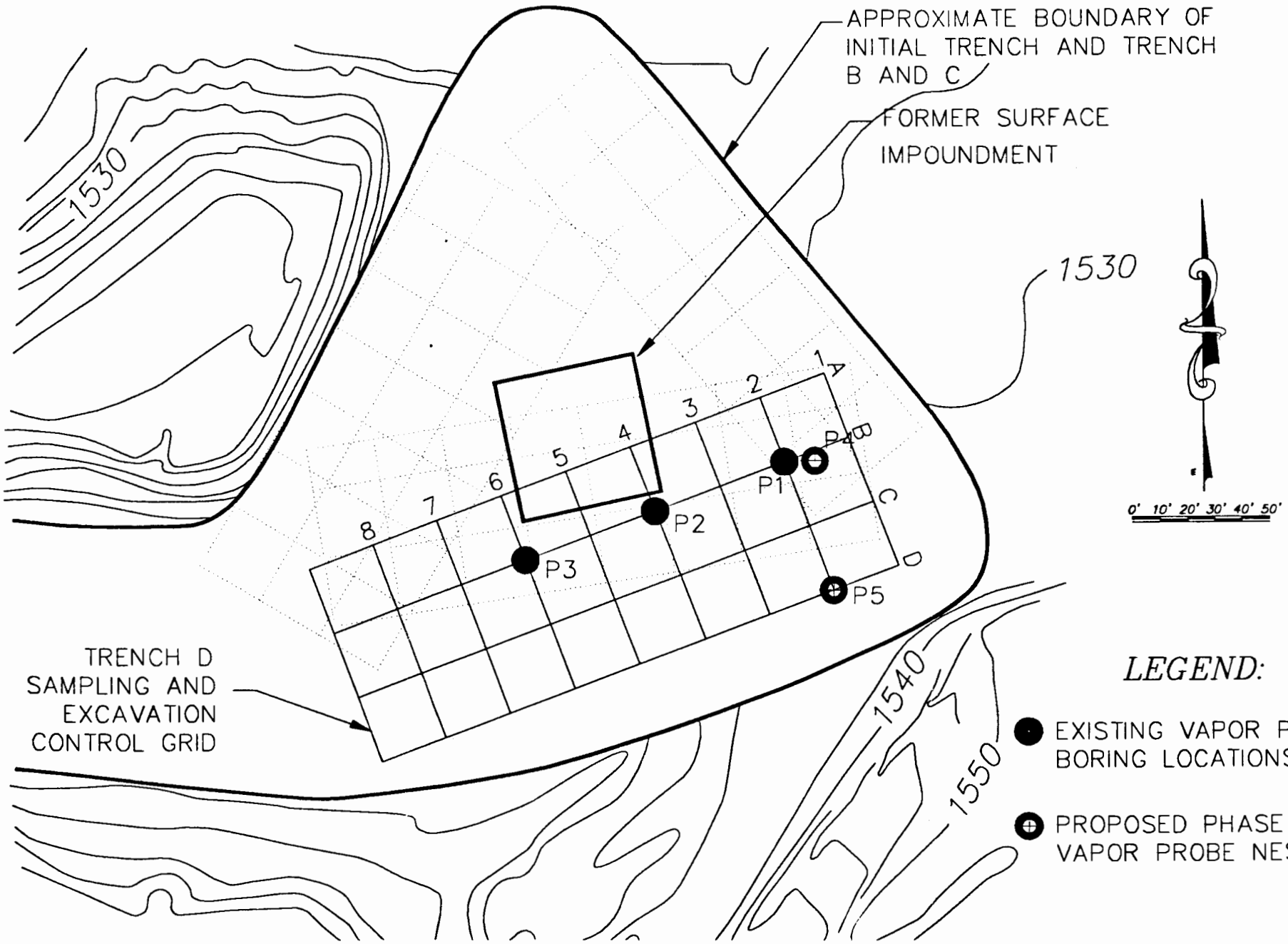
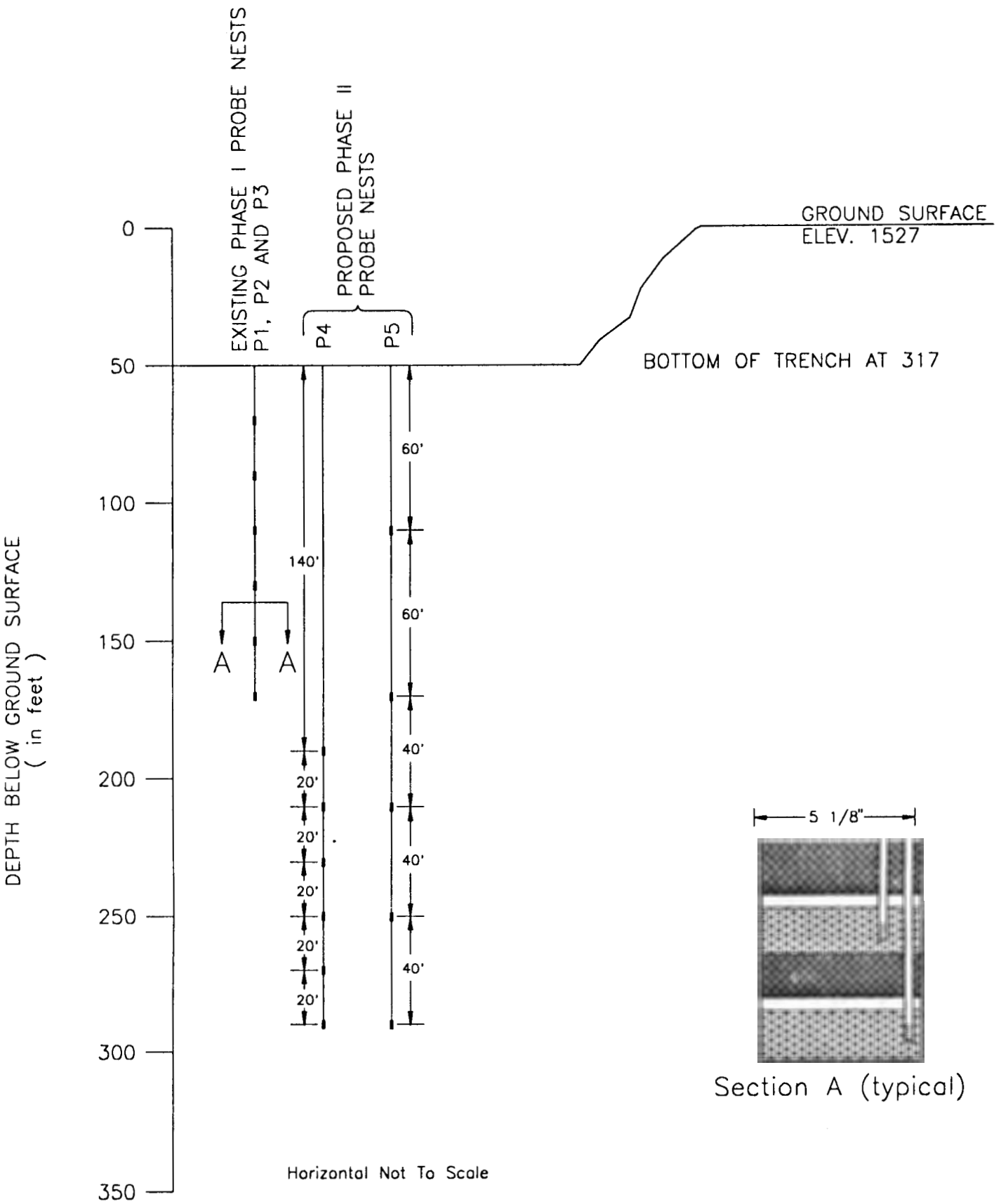


BERMITE DIVISION - WHITTAKER CORPORATION	Wenck Associates, Inc. — Consulting Engineers — Twelve Oaks Center, 15500 Wayzata Blvd., Wayzata, MN 55391	APR 1989
Existing and Phase II Vapor Probe Nest Locations		Fig. 1



Section A (typical)

BERMITE DIVISION - WHITTAKER CORPORATION	Consulting Engineers	APR 1989
Existing and Phase II Vapor Probe Depths	Wenck Associates, Inc. Twelve Oaks Center 15500 Wayzata Blvd. Wayzata, MN 55391	Fig. 2

Wenck Associates, Inc.

March 6, 1989

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FAX – (612) 476-0504

Mr. Alan Sorsher
Department of Health Services
Toxic Substances Control Division III
1405 North San Fernando Blvd, #300
Burbank, CA 91504

Re: Subsurface Vapor Probes at the 317 Area,
Bermite Division, Whittaker Division

Dear Mr. Sorsher:

Pursuant to our meeting on February 24, 1989 and our discussions this past week, I am writing this letter to verify our discussions and the changes to the construction and testing of the above referenced vapor probes.

As indicated in the "Subsurface Vapor Probe Plan at the 317 Area, February 1989" report, split-spoon soil samples will be collected at approximately 20-foot intervals whether drilling is accomplished by hollow-stem auger or by bentonite mud-rotary. One sleeve from each of the split-spoon samples will be transferred into a glass jar for head space analysis in the field.

After the soil sample has been placed into the glass jar and sealed with a cap, the sample will set aside for the head space analysis approximately 20 minutes later. The analysis will be accomplished with an Organic Vapor Analyzer (OVA) calibrated to methane. The probe of the OVA Meter will be placed into the jar immediately after removing the jar lid.

OVA readings will also be taken of the drill cuttings as they are brought to the ground surface and of the split-spoon sampler as it is opened. In addition, OVA readings of the ambient air, specifically the workers' breathing zone, will be taken as required by our Health and Safety Plan.

The remaining two sample sleeves from each split-spoon sample will either be retained for laboratory analysis or will be discarded to the ground surface. It is anticipated that three (3) soil samples per boring will be retained for analysis by EPA Methods 8240 (Volatile Organics) and 8270 (Semi-Volatile Organics). In addition, a definitive, bio-assay test will be performed on these samples.

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In the event that the drilling method is switched to bentonite mud, drilling fluids will be retained in above-ground tanks specifically provided for this purpose. The drilling fluids will be analyzed to determine the proper method of disposal.

If drilling mud is used for construction of the probes, the mud will be removed from the boring prior to placement of the probes. An effort will be made to remove mud from the sidewalls of the borings. This will include scraping the boring sidewalls if it is found that scraping does not cause excessive caving of the boring.

The minimum depth that the borings will be constructed and probes will be placed has been changed from 30 feet to 40 feet. The maximum depth is dependent on the field OVA readings and on field conditions encountered during drilling. The borings may continue past 120 feet and the decision to drill farther will be made in the field. In no case will drilling continue through whatever geologic formation exists that confines the first encountered groundwater at the Bermite facility.

If the maximum depth of the probes is greater than 120 feet, the spacing of the lowermost three (3) probes will be spaced at approximately 20-foot intervals and the upper three (3) probes will be spaced equally in the remaining space.

Water will be added to the sand-bentonite mixture to ensure proper activation of the bentonite and sealing of the boring between probes. A #3 sand, similar to the screen gravel pack, will be used in the sand/bentonite seal instead of the #60 sand specified in the report.

Sampling of the probes will not proceed for at least 24 hours after construction is complete.

A cap will be placed over each sample port of each probe. This cap will be removed for sampling and then placed back on the port when sampling is completed.

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A flow meter will be utilized with the OVA during sampling to verify the sampling volumetric flowrate of the OVA. The probes will be sampled on a weekly basis for four weeks.

Alan, I trust that the above is a correct review of the discussions and changes regarding the vapor probes. Please call me if you have any comments or changes to the above.

We have been assembling the necessary supplies and equipment for probe construction. We have scheduled a driller to begin construction on Tuesday, March 7, 1989. Please call Glen at Bermite to verify the construction schedule if you wish to be present during any of the activities.

Sincerely,

WENCK ASSOCIATES, INC.

Christopher F. Thompson, P.E.

CFT/aec

cc: Gordon Louttit - Whittaker
John Peloquin - Bermite
Michael Fernandez - EPA Region IX

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September 21, 1988

Mr. Alan Sorsher
Department of Health Services
Toxic Substances Control Division
107 S. Broadway, Room 7128
Los Angeles, California 90012

Re: Bermite Division, Whittaker Corporation
Groundwater Monitoring Requirements
at the 317 and 342 Former Surface Impoundments

Dear Mr. Sorsher:

In accordance with our conversation on September 9, 1988, we have prepared this letter to request that the California Department of Health Services formally approve the groundwater monitoring system for the 317 former surface impoundment and the 342 former surface impoundment. In fulfillment of the groundwater monitoring requirements of the Approved RCRA Closure Plan, wells were installed that were used to characterize the uppermost aquifer beneath the RCRA units. A proposal was then prepared and submitted to DHS and EPA detailing the required groundwater monitoring system. This proposal, titled "RCRA groundwater Monitoring System Proposed Final Configuration" was sent on May 9, 1988. According to the RCRA Closure Schedule, DHS approval of this system is required 30 days after submittal.

The groundwater monitoring system proposal referenced above detailed the geology/hydrogeology at the site, the characteristics of the uppermost aquifer and the direction and rates of groundwater flow.

As a result of the known physical characteristics at the 317 and 342 Areas and the results of the soil borings and soil sample analysis results at the 342 Area, no downgradient well at the 342 Area was proposed. The sample analysis results were contained in a report titled "Verification Sampling Results at Selected RCRA Units" dated March 1988. It was shown that no organic compounds were detected in the soils at this RCRA unit and that the metal compounds in the soils are not present in statistically significant concentrations.

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In accordance with CFR 40 265.90(c), the requirements for groundwater monitoring at the 342 Area can be waived. A demonstration of the reasons for the waiver has been prepared and is attached hereto. In summary, the reasons for the waiver are: 1) There was never a documented, suspected or measured release of hazardous waste or hazardous constituents from the former surface impoundment at the 342 Area, 2) There is no evidence of soil contamination at the 342 Area, 3) The hydrogeological features at the facility make it extremely unlikely that hazardous wastes or hazardous constituents could migrate to the first encountered groundwater beneath the site and from there to water supply wells or surface water and 4) The groundwater sampling has shown no groundwater contamination.

If the California DHS has a formal approval process for this waiver, we request that this approval be granted as soon as possible.

Alan, as you indicated, there is disagreement within the DHS as to what department or whom is responsible for the actual approval of the groundwater monitoring system at the Bermite Division, Whittaker Corporation. We have sent an additional request for approval, therefore, to Mr. David Schwartzbart. We have indicated to him the many reports that we have submitted to DHS regarding the RCRA Closure activities at Bermite.

We request that DHS review the documents regarding the groundwater monitoring system and approve it as soon as possible. We are available to assist in any way that we can.

The approved groundwater monitoring plan, which details the collection and analysis of groundwater samples from the groundwater monitoring system, has been submitted to DHS and EPA and has incorporated the modifications that DHS suggested. We plan to collect samples for analysis during the week of October 3. We will let you know the date and time prior to the sampling so that you may prepare to split sample if you desire.

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Mr. Alan Sorsher
Page Three
September 21, 1988

Please review this request for approvals as soon as possible. If you have questions regarding the groundwater monitoring system, please call us at (612) 475-0858.

Your prompt attention to this matter is appreciated.

Sincerely,

WENCK ASSOCIATES, INC.

Christopher F. Thompson, P.E.

CFT/rel

Attachment

cc: Gordon Louttit - Whittaker
John Peloquin - Bermite
Michael Fernandez - EPA
Larry Peterson - RWQCB
David Schwartzbart - DHS

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Whittaker

Whittaker Corporation
10880 Wilshire Boulevard
Los Angeles, CA 90024-4163
213/475-9411

Gordon J. Louttit
Vice President
Assistant General Counsel

September 15, 1988

Mr. David Schwartzbart
Hazardous Material Specialist
Department of Health Services
107 South Broadway, Room 7011
Los Angeles, California 90012

Re: Bermite Division
RCRA Closure Groundwater Monitoring System
for the 317 Area

Dear Mr. Schwartzbart:

During a meeting on September 7, 1988 with Mr. Alan Sorsher and Mr. Gautam Guha of the Department of Health Services (the "Department"), Mr. Sorsher asked about the status of our compliance monitoring evaluation ("CME") audit. After some discussion, Mr. Guha observed that the Department preferred to schedule CMEs upon completion of the proposed groundwater monitoring system and asked whether our proposed system was completed and fully operational. Our response was that we were not certain if our proposed system was complete since we had not yet been advised by the Department as to whether the four wells presently in place at the area known as 317 had been approved. Mr. Sorsher and Mr. Guha suggested that we request that you, as the present hydrogeologist on this project, review our submissions concerning the groundwater monitoring system installed at the 317 area and advise us as to its acceptability.

In considering this request, you will undoubtedly need to review the various reports and other data on file with the Department and the E.P.A. We have attached as Appendix A a bibliography of relevant submissions.

In recent discussions, Ms. Elizabeth Lafferty, the Department's former hydrogeologist on this project, indicated that the present groundwater monitoring system, consisting of four monitoring wells completed into the uppermost aquifer in the 317 area, is most likely adequate in view of the following:

a. Tests confirm that no contaminants are present in the wells.

b. The former surface impoundments at the 317 area were removed, with the Department's approval, more than five years ago.

c. The groundwater in this area is approximately 670 feet below the surface, and there are numerous clay layers between the surface and the confined groundwater to prevent any residual contamination from ever reaching the groundwater.

d. The 317 area is a steeply sloped semi-arid to arid site with a net loss of moisture, i.e., there is no infiltration from the surface to the groundwater.

e. Groundwater monitoring should not be required at the 342 area as this area is appropriate for a waiver of monitoring requirements as shown by the enclosed Attachment B.

Our proposed groundwater monitoring system was submitted for approval on May 9, 1988. As yet, except for the informal expressions referred to above, no formal approval by the Department has been received.

In accordance with our final Groundwater Sampling and Analysis Plan submitted on August 25, 1988, we have scheduled the first quarterly sampling event for October 4, 1988. The Department and the E.P.A. have been invited to be present and to split samples, if desired.

Your prompt review and response will be greatly appreciated. We are available to meet with you to discuss any aspect of this matter.

Very truly yours,

GJL:tmb
Enclosures

cc: Alan Sorsher
Michael Fernandez
Larry Peterson
Elizabeth Lafferty
Norm Wenck
John Peloquin (Bermite)

APPENDIX A

ANNOTATED BIBLIOGRAPHY OF
BERMITE DIVISION
RCRA CLOSURE DOCUMENTS

BIBLIOGRAPHY

DOCUMENTS SUBMITTED FOR RCRA CLOSURE ACTIVITIES AT BERMITE DIVISION, WHITTAKER CORPORATION

Date	Activity
August 6, 1986	Closure Plan submitted to DHS and EPA for closure of RCRA units.
April 1, 1987	Revised RCRA Closure Plan submitted to DHS and EPA
June 30, 1987	Wipe Test Report submitted to DHS and EPA.
November 10, 1987	Sampling and Analysis Plan for verification sampling at RCRA units 317, 342, Burn Area, Burn Cage Pans and Rails Area and East Fork Area submitted for approval.
December 24, 1987	Groundwater Monitoring Plan for RCRA units 317 and 342 sent to DHS and EPA for approval.
December 28, 1987	Approved RCRA Closure Plan Modifications received from DHS and EPA.
March 1988	Groundwater investigation at the 317 and 342 Areas Report submitted to DHS and EPA.
March 7, 1988	Clean Closure Certification Report submitted to DHS and EPA for six RCRA units (buildings 502, 504, 506, E-1, E-2, E-3).
March 23, 1988	Verification Sampling Report concerning closure of RCRA units 223, 236, Lead Azide, Burn Area, Burn Cage Pans and Rails Area, East Forks Area and 342 Area submitted to DHS and EPA.
March 23, 1988	Progress Report of Soil Characterization at the 317 Area Report submitted to DHS and EPA.
March 23, 1988	Request for permission to complete characterization at the 317 Area sent to DHS and EPA.
May 9, 1988	"RCRA Groundwater Monitoring System Proposed Final Configuration" report sent to DHS and EPA.

BIBLIOGRAPHY (continued)

Date	Activity
May 10, 1988	Clean Closure Report on 223, 236 and Lead Azide Area submitted to DHS and EPA for review and approval.
June 16, 1988	Clean Closure Certification Report on Burn Area, Burn Cage Pans and Rails Area, and East Fork Area submitted to DHS and EPA for review and approval.
July 21, 1988	Sent Progress Report No. 2 of Soil Characterization at 317 Area to DHS and EPA - includes proposed boring and probe plan for 317 Area.
August 25, 1988	Propose further characterization and removal of soils at 317 Area to DHS and EPA.
August 25, 1988	Submit Documentation Report on Construction of RCRA Groundwater Monitoring Well 4.
August 25, 1988	Submit Revised Groundwater Sampling and Analysis Plan to DHS and EPA for review and approval.

APPENDIX B

WAIVER TO EXCLUDE THE
342 AREA FROM THE RCRA CLOSURE PLAN
GROUNDWATER MONITORING SYSTEM

WAIVER TO EXCLUDE THE 342 AREA FROM THE RCRA CLOSURE PLAN GROUNDWATER MONITORING SYSTEM

Prepared for:

WHITTAKER CORPORATION - BERMITE DIVISION
22116 West Soledad Canyon Road
Saugus, California 91350

Prepared by:

WENCK ASSOCIATES, INC.
832 Twelve Oaks Center
15500 Wayzata Boulevard
Wayzata, Minnesota 55391-1418
(612) 475-0858

SEPTEMBER 1988

I hereby certify that this report was prepared by me or under my direct supervision and that I am a duly Registered Professional Engineer under the laws of the State of California.

9·21-88

Norman C. Wenck — California Registration No. 41317

I. INTRODUCTION

In accordance with the provisions of the approved RCRA Closure Plan for the Bermite Division of Whittaker Corporation (the "Facility") and 40 CFR 265.90(c), this waiver has been prepared to document that the RCRA unit known as the 342 Area can be excluded from the groundwater monitoring requirements of the approved RCRA Closure Plan.

As a result of soil and groundwater sample collection and analysis, completed according to the RCRA Closure Plan, it is demonstrated that the 342 Area has a low potential for migration of hazardous waste or hazardous waste constituents from the 342 Area via the uppermost aquifer to water supply wells or to surface water.

The justification for this waiver from the groundwater monitoring requirements is given below. A copy of the pertinent section of the RCRA Closure Plan is included as Attachment 1. A copy of 40 CFR 265.90(c)i is included as attachment 2.

Documents which are referenced below have all been submitted to and are on file with the California Department of Health Services (DHS) and the Region IX U.S. Environmental Protection Agency (EPA).

II. WAIVER JUSTIFICATION

As a result of soil and groundwater investigations undertaken under the guidance of the approved RCRA Closure Plan, it has been shown that the 342 Area cannot have and will not in the future have impacted the groundwater beneath the facility and water supply wells located hydraulically downgradient of the facility. The specific facts and information that support this are as follows:

1. The 342 Area was a hypolon-lined surface impoundment. There was no documented, suspected, or measured release of wastes stored in the impoundment. At the time of closure, all wastes were properly removed off-site and disposed. This RCRA unit

was closed in 1983 under the supervision of DHS, EPA and the Regional Water Quality Control Board.

The impoundment liner was inspected at the time of removal and there was no evidence of tears, rips or holes. The surface soils in the vicinity of the former impoundment and the leak detection system, installed for the impoundment, were inspected and there was no evidence of soil contamination or past leaks, spills or releases. This information was documented in a letter to Mr. Harry Sneh, at the DHS from Mr. Larry N. Bohanan of Bermite, dated November 20, 1985.

2. Soil borings beneath the former surface impoundment, taken at the time of closure in 1983, and again taken in 1987 in accordance with the approved RCRA Closure Plan, did not detect soil contamination by specified organic compounds or specified metals. The results of the soil sample collection and analysis were documented in a report entitled, "Verification Sampling Results at Selected RCRA Units", dated March 1988.

3. The geological and hydrogeological features of the facility show that, if a release of wastes was to have occurred during the operating life of the 342 Area, there is a low potential for those wastes to have reached the uppermost aquifer at the facility. It has been shown that there is no infiltration of rainfall from the ground surface to the uppermost aquifer ("RCRA Groundwater Monitoring System, Proposed Final Configuration", dated May 9, 1988). The net movement of water and vapor in the subsurface soils is actually from the aquifer to the ground surface due to the small amount of rainfall and the relatively warm and dry environment at the facility.

   The uppermost aquifer beneath the facility is confined. The confining layer is approximately 460 feet below the 342 area. The potentiometric surface of the groundwater is approximately 150 feet above the confining layer.

4. Groundwater samples have been collected and analyzed from four RCRA monitoring wells installed at the facility. Monitoring well W-2 is located adjacent to the 342

Area. No contamination has been detected in any of the four wells. Monitoring well W-2 will be utilized to complete the groundwater monitoring requirements of another RCRA unit, the 317 Area.

5. As was shown in the report entitled, "RCRA Groundwater Monitoring System, Proposed Final Configuration", dated May 9, 1988, the rate of groundwater movement in the uppermost aquifer is approximately 0.13 ft/day. The nearest well that is hydraulically downgradient from the 342 Area is over one mile away. Therefore, it takes 500 years for the water directly beneath the 342 Area to reach this well.

The five points discussed above show that the potential for a release from the 342 Area to have been low and that the potential for hazardous waste or hazardous waste constituents migrating into the uppermost aquifer, and thence to water supply wells, is low. Therefore, a waiver from groundwater monitoring requirements is justified.

ATTACHMENT 1

APPROVED RCRA CLOSURE PLAN REGARDING
GROUNDWATER MONITORING REQUIREMENTS

III Groundwater Monitoring Plan for 342 and 317 Impoundments

Recent final rules for surface impoundment closure require that the groundwater be verified free of contamination from hazardous constituents. If contamination is found, the program will be modified to include assessment and corrective action.

1. Three wells shall be installed capable of identifying and characterizing the uppermost aquifer as described in EPA's Technical Enforcement Guidance Document, including determining the direction of groundwater flow in the vicinity of the former surface impoundments. If three wells prove inadequate to identify and characterize the uppermost aquifer, Bermite will submit a plan for additional wells. After further consultation with DHS, EPA, and RWQCB, well locations, drilling techniques, well construction and development methods and other information will be submitted by Bermite and will be approved or modified and approved by the regulatory agencies prior to execution. The determination shall be performed by Bermite, and a report of the findings shall be submitted to EPA, DHS, and RWQCB for approval before proceeding to the next step.

2. If necessary, as determined by the above agencies, additional wells shall be installed to complete a groundwater monitoring system per the EPA's Technical Enforcement Guidance Document. After further consultation with DHS, EPA, and RWQCB, a proposal for the system shall be submitted which will include, but not be limited to well locations, drilling techniques, and well construction and development details. The proposal shall be approved by the above regulatory agencies prior to installation of the system. The system shall be capable of detecting and assessing any impact on groundwater from the former surface impoundments. If necessary, the system shall be durable enough to operate over an extended period of time.

3. A proposed interim status closure groundwater monitoring program shall be submitted to the above agencies for approval. The program shall include, but not be limited to sampling techniques and equipment, maintenance and security of the system, sampling frequency and the chemical and physical water parameters to be tested.

ATTACHMENT 2

40 CFR 265.90(c)
APPLICABILITY OF GROUNDWATER MONITORING REQUIREMENTS

(c) Facility closure as specified in § 265.115.

[45 FR 33232, May 19, 1980, as amended at 48 FR 3982, Jan. 28, 1983]

Subpart F—Ground-Water Monitoring

§ 265.90 Applicability.

(a) Within one year after the effective date of these regulations, the owner or operator of a surface impoundment, landfill, or land treatment facility which is used to manage hazardous waste must implement a ground-water monitoring program capable of determining the facility's impact on the quality of ground water in the uppermost aquifer underlying the facility, except as § 265.1 and paragraph (c) of this section provide otherwise.

(b) Except as paragraphs (c) and (d) of this section provide otherwise, the owner or operator must install, operate, and maintain a ground-water monitoring system which meets the requirements of § 265.91, and must comply with §§ 265.92 through 265.94. This ground-water monitoring program must be carried out during the active life of the facility, and for disposal facilities, during the post-closure care period as well.

(c) All or part of the ground-water monitoring requirements of this subpart may be waived if the owner or operator can demonstrate that there is a low potential for migration of hazardous waste or hazardous waste constituents from the facility via the uppermost aquifer to water supply wells (domestic, industrial, or agricultural) or to surface water. This demonstration must be in writing, and must be kept at the facility. This demonstration must be certified by a qualified geologist or geotechnical engineer and must establish the following:

(1) The potential for migration of hazardous waste or hazardous waste constituents from the facility to the uppermost aquifer, by an evaluation of:

(i) A water balance of precipitation, evapotranspiration, runoff, and infiltration; and

(ii) Unsaturated zone characteristics (i.e., geologic materials, physical properties, and depth to ground water); and

(2) The potential for hazardous waste or hazardous waste constituents which enter the uppermost aquifer to migrate to a water supply well or surface water, by an evaluation of:

(i) Saturated zone characteristics (i.e., geologic materials, physical properties, and rate of ground-water flow); and

(ii) The proximity of the facility to water supply wells or surface water.

(d) If an owner or operator assumes (or knows) that ground-water monitoring of indicator parameters in accordance with §§ 265.91 and 265.92 would show statistically significant increases (or decreases in the case of pH) when evaluated under § 265.93(b), he may, install, operate, and maintain an alternate ground-water monitoring system (other than the one described in §§ 265.91 and 265.92). If the owner or operator decides to use an alternate ground-water monitoring system he must:

(1) Within one year after the effective date of these regulations, submit to the Regional Administrator a specific plan, certified by a qualified geologist or geotechnical engineer, which satisfies the requirements of § 265.93(d)(3), for an alternate ground-water monitoring system;

(2) Not later than one year after the effective date of these regulations, initiate the determinations specified in § 265.93(d)(4);

(3) Prepare and submit a written report in accordance with § 265.93(d)(5);

(4) Continue to make the determinations specified in § 265.93(d)(4) on a quarterly basis until final closure of the facility; and

(5) Comply with the recordkeeping and reporting requirements in § 265.94(b).

(e) The ground-water monitoring requirements of this subpart may be waived with respect to any surface impoundment that (1) Is used to neutralize wastes which are hazardous solely because they exhibit the corrosivity characteristic under § 261.22 of this chapter or are listed as hazardous wastes in Subpart D of Part 261 of this chapter only for this reason, and (2)

Whittaker

Whittaker Corporation
10880 Wilshire Boulevard
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213/475-9411

Gordon J. Louttit
Vice President
Assistant General Counsel

September 15, 1988

Mr. David Schwartzbart
Hazardous Material Specialist
Department of Health Services
107 South Broadway, Room 7011
Los Angeles, California 90012

Re: Bermite Division
RCRA Closure Groundwater Monitoring System
for the 317 Area

Dear Mr. Schwartzbart:

During a meeting on September 7, 1988 with Mr. Alan Sorsher and Mr. Gautam Guha of the Department of Health Services (the "Department"), Mr. Sorsher asked about the status of our compliance monitoring evaluation ("CME") audit. After some discussion, Mr. Guha observed that the Department preferred to schedule CMEs upon completion of the proposed groundwater monitoring system and asked whether our proposed system was completed and fully operational. Our response was that we were not certain if our proposed system was complete since we had not yet been advised by the Department as to whether the four wells presently in place at the area known as 317 had been approved. Mr. Sorsher and Mr. Guha suggested that we request that you, as the present hydrogeologist on this project, review our submissions concerning the groundwater monitoring system installed at the 317 area and advise us as to its acceptability.

In considering this request, you will undoubtedly need to review the various reports and other data on file with the Department and the E.P.A. We have attached as Appendix A a bibliography of relevant submissions.

In recent discussions, Ms. Elizabeth Lafferty, the Department's former hydrogeologist on this project, indicated that the present groundwater monitoring system, consisting of four monitoring wells completed into the uppermost aquifer in the 317 area, is most likely adequate in view of the following:

a. Tests confirm that no contaminants are present in the wells.

b. The former surface impoundments at the 317 area were removed, with the Department's approval, more than five years ago.

c. The groundwater in this area is approximately 670 feet below the surface, and there are numerous clay layers between the surface and the confined groundwater to prevent any residual contamination from ever reaching the groundwater.

d. The 317 area is a steeply sloped semi-arid to arid site with a net loss of moisture, i.e., there is no infiltration from the surface to the groundwater.

e. Groundwater monitoring should not be required at the 342 area as this area is appropriate for a waiver of monitoring requirements as shown by the enclosed Attachment B.

Our proposed groundwater monitoring system was submitted for approval on May 9, 1988. As yet, except for the informal expressions referred to above, no formal approval by the Department has been received.

In accordance with our final Groundwater Sampling and Analysis Plan submitted on August 25, 1988, we have scheduled the first quarterly sampling event for October 4, 1988. The Department and the E.P.A. have been invited to be present and to split samples, if desired.

Your prompt review and response will be greatly appreciated. We are available to meet with you to discuss any aspect of this matter.

Very truly yours,

GJL:tmb
Enclosures

cc: Alan Sorsher
Michael Fernandez
Larry Peterson
Elizabeth Lafferty
Norm Wenck
John Peloquin (Bermite)

Whittaker

Whittaker Corporation
10880 Wilshire Boulevard
Los Angeles, California 90024-4163

Michael Fernandez
Environmental Engineer
Environmental Protection Agency
Region 9
c/o Toxic and Waste Management Division
215 Fremont Street
San Francisco, CA 94105

Wenck Associates, Inc.

August 25, 1988

Consulting Engineers
(612) 475-0858
FAX – (612) 476-0504

Mr. Alan Sorsher
Department of Health Services
Toxic Substances Control Division
107 South Broadway, Room 7128
Los Angeles, California 90012

Re: Progress Report No. 17 -
Approved RCRA Closure Plan Activities
Through August 26, 1988

Dear Mr. Sorsher:

Since the time of our last progress report of the RCRA Closure activities, the data compiled during the soil characterization of the 317 former surface impoundment has been sent to you in a report entitled, Soil Characterization at the 317 Area, Progress Report No. 2 dated June, 1988. In addition, a fourth RCRA groundwater monitoring well that was proposed to you on May 10, 1988 has been completed.

As was reported in the Soil Characterization at the 317 Area, Progress Report No. 2, the extent of the VOC-contaminated soils has been determined in the horizontal direction but not the vertical direction. At the 30 foot depth of the excavation at the 317 area, soils exhibiting VOC vapors are known to exist as outlined on Figure 26 of the above referenced report.

As directed by the Approved RCRA Closure Plan, verification borings are to be installed at the 317 Area to verify that the extent of VOC contamination has been determined. A plan for the installation of these was presented in the above referenced report. We discussed this plan briefly in our telephone conversation on August 5, 1988. It is our intention to install the verification borings as indicated on Figure 27 of the referenced report beginning on approximately September 12, 1988.

In accordance with the Approved RCRA Closure Plan we have decided to characterize the vertical extent of VOC-containing soils by expanding the technique of trenching at the 317 Area. This characterization and soil removal will be completed in a similar manner to the recently completed soil removal at the 317 Area.

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We have proceeded with the necessary permission to excavate these soils from the South Coast Air Quality Management District. Attached herein you will find our correspondence and the granted exemption from District Rule 1150 pertaining to the excavation. As a result of a new District Rule, Rule 1166, a Rule 1166 Mitigation Plan for Volatile Organic Emission, as defined by the District, is required. Also enclosed herein you will find our Mitigation Plan which has been submitted to the South Coast Air Quality Management District. This plan specifies what measures will be taken to identify, remove and dispose of volatile organic compound contaminated soils from the 317 area. Pursuant to District Rule 1166, we propose to haul these soils off-site to a permitted hazardous waste landfill.

The further characterization of the VOC-contaminated soils will commence on August 29, 1988. If you have any questions or comments to this plan, please let us know.

As we discussed on August 5, 1988, we are preparing an addendum to the Soil Characterization at the 317 Area, Progress Report No. 2 which will address the analysis results of the base-neutral-acids compounds analyzed in the soils at the near bottom of the three initial excavation trenches.

You will find attached the Documentation Report on the fourth RCRA groundwater monitoring well and the RCRA groundwater monitoring system consisting of RCRA groundwater monitoring wells one through four. Well W-4 is located downgradient of the 317 former surface impoundment. As indicated in the referenced report, water samples taken from all wells show that no volatile organic compounds exist in the groundwater beneath the 317 area.

By copy of this letter we are submitting to you the revised Groundwater Sampling and Analysis Plan as a requirement of the approved RCRA Closure Plan. We have revised this plan in accordance with your letter of March 23, 1988.

The Groundwater Sampling and Analysis Plan delineates the sample plan and analytical parameters. You have indicated the desire to split sample with us for your own analysis. Please be prepared to split sample during the first sampling episode which is planned for October 4, 1988.

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Also enclosed with this progress report is a Documentation Report responding to the EPA Request for Information Regarding Potential Releases from Solid Waste Management Units at the Bermite Facility. This response indicates the existence of solid and hazardous waste management units at the Bermite facility, including the RCRA units addressed in the Approved RCRA Closure Plan, underground storage tanks formerly used at the Bermite facility, and former landfills at the site.

Please review the enclosed documents and call with any questions.

Sincerely,

WENCK ASSOCIATES, INC.

Christopher F. Thompson, P.E.

CFT/cmk
Enclosures

cc: Michael Fernandez, EPA
Larry Peterson, RWQCB
Gordon Louttit, Whittaker

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July 21, 1988

Mr. Alan Sorsher
Department of Health Services
Toxic Substances Control Division
107 South Broadway Room 7128
Los Angeles, California 90012

Re: Soil Characterization at the 317 Area,
Progress Report No. 2

Dear Mr. Sorsher:

Please find attached two copies for your review and approval of the above referenced report. This report was prepared and is submitted in accordance with the approved RCRA Closure Plan for the Bermite Division, Whittaker Corporation.

This Progress Report No. 2 also includes the required Boring and Probe Plan for the 317 Area. Please review the proposed plan as we would like to proceed with the borings commencing August 8, 1988.

Your prompt attention to these matters is appreciated. If you have any questions or comments pertaining to the above please do not hesitate to call me at (612) 475-0858.

Respectfully Submitted,

WENCK ASSOCIATES, INC.

Christopher F. Thompson, P.E.

CFT/lrw

attachments

cc: Mr. Michael Fernandez - Region IX EPA
Mr. Gordon Louttit - Whittaker Corporation

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May 6, 1988

Mr. Alan Sorsher
Department of Health Services
Toxic Substances Control Division
107 S. Broadway, Room 7128
Los Angeles, California 90012

Re: Progress Report No. 15 -
Implementation of Revised RCRA Closure Plan
Week of May 2, 1988

Dear Mr. Sorsher:

Work continued on the closure of the Bermite facility with the additional soil characterization at the 317 area. We have reached the 30 foot depth in trench C. All OVA readings have been taken as have required soil samples for laboratory analysis. In addition, two samples were taken and will be analyzed for BNA's by EPA Method 8270.

Trench B preparation work has also been started during this work period. This trench will be excavated and sampled in the same manner as trench C incorporating the revised sampling plan for core samples.

A letter verifying our agreement on the core sampling and QA/QC requirements for field OVA sampling and core sampling was transmitted to you during this work period.

The report on our proposed final monitoring well system configuration will be sent to you at the beginning of the next work period. Please review it in preparation of our meeting on May 13, 9:00 a.m. at DHS.

If you have any questions on any of the matters included in this report please do not hesitate to contact me.

Respectfully submitted,

WENCK ASSOCIATES, INC.

Christopher F. Thompson, P.E.
Senior Engineer

cc: Michael Fernandez, EPA
Larry Peterson, RWQCB

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May 4, 1988

Mr. Alan Sorsher
Department of Health Services
Toxic Substances Control Division
107 South Broadway, Room 7128
Los Angeles, CA 90012

Re: Soil Characterization Activities at the 317 Area, Bermite Division, Whittaker Corporation, Saugus, California

Dear Mr. Sorsher:

The purpose of this letter is to verify our discussions and agreements in our telephone conversation on April 29, 1988. As I requested, you have agreed that core samples for laboratory analysis will be taken at two foot intervals instead of the six inch intervals at which we have been sampling. At the two foot intervals (every fourth lift), two core samples will be taken, one at an area of a relatively high Organic Vapor Analyzer (OVA) reading, and one at a relatively low or zero OVA reading. For every 20 core samples taken or for every group of samples that are taken, one duplicate core sample will be taken also. At our present rate of characterization, one duplicate sample per week will be taken.

The core samples will continue to be analyzed by EPA method 8240. In accordance with the approved RCRA Closure Plan, in addition to the field duplicates that are to be taken and analyzed, laboratory duplicates are also being analyzed. We are presently running a duplicate laboratory analysis after every 10 core samples.

In addition to the core samples being taken and analyzed for volatile organics by EPA Method 8240, two core samples per trench will be analyzed for semi-volatile organics (base-neutral-acid compounds) by EPA Method 8270. We are presently taking core samples for this analysis and archiving them in a refrigerator at the Bermite facility to insure that when we reach the 30 foot depth, we will have core samples from an area of high OVA readings.

In addition to the core sampling, we are continuing to sample the soils in each lift with the OVA. As you requested, we will be taking field OVA duplicate readings. The duplicates will be taken approximately four inches away

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from the previous sampling location and towards the outside edge of the excavation. At least one high node and one low node per lift will be sampled in this manner. This will insure that at least 10 percent of the field OVA readings will have duplicate samples.

I believe that the above summarizes and verifies the discussions we had about the soil characterization activities at the 317 area. If you have any comments or questions on these matters, please do not hesitate to call me. I will be at the Bermite facility during the week of May 9, 1988.

Sincerely,

WENCK ASSOCIATES, INC.

Christopher F. Thompson, P.E.

CFT/cmk

cc: Gordon Louttit, Whittaker
John Peloquin
Michael Fernandez, USEPA

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April 18, 1988

Michael Fernandez
U.S. Environmental Protection Agency
Region IX
215 Fremont Street
San Francisco, CA 94105

Re: Approval to proceed with additional soil characterization at the 317 Area, Bermite Division, Whittaker Corporation, Saugus, CA.

Dear Mr. Fernandez:

By this letter I am confirming your verbal approval on April 15, 1988 for Whittaker Corporation to proceed with further soil characterization at the 317 Area.

The soil characterization activities will begin Monday April 18, 1988. We appreciate your prompt approval of our proposal and your efforts to complete closure of this facility.

Sincerely,

WENCK ASSOCIATES, INC.

Christopher F. Thompson, P.E.

cft/tlm

c.c. Gordon Louttit, Whittaker
John Peloquin, Whittaker
Alan Sorsher, California DHS

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April 22, 1988

Mr. Alan Sorsher
Department of Health Services
Toxic Substances Control Division
107 S. Broadway, Room 7128
Los Angeles, California 90012

Re: Progress Report No. 13 -
Implementation of Revised RCRA Closure Plan
Week of April 18, 1988

Dear Mr. Sorsher:

Work continued on the closure of the Bermite facility with the additional soil characterization at the 317 area. Approval to proceed was received from Michael Fernandez on April 15, 1988.

The excavation was interrupted due to rainfall on Tuesday and Wednesday this week. The six foot depth in trench "C" was reached, however, on Friday afternoon.

We are revising the groundwater sampling plan to reflect the changes requested in your approval of this sampling plan. The revised plan will be sent to you for approval. We are also preparing a report on the groundwater monitoring system which will detail our proposal for the final configuration of the groundwater monitoring system for the 317 and 342 areas. This report will be sent to you during the first week of May.

If you have any questions or comments on this report, please feel free to contact me.

Respectfully submitted,

WENCK ASSOCIATES, INC.

Christopher F. Thompson, P.E.
Senior Engineer

cc: Michael Fernandez, EPA
Larry Peterson, RWQCB

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April 14, 1988

Alan Sorsher
Department of Health Services
Toxic Substances Control Division
107 So. Broadway, Room 7128
Los Angeles, CA 90012

Re: Approval to proceed with further soil characterization at the 317 Area

Dear Mr. Sorsher:

By this letter I am confirming your verbal approval for Whittaker Corporation to proceed with further soil characterization at the 317 Area. As you requested a written explanation of the answers to your questions about the further soil characterization is given below.

We understand that final approval to proceed will be obtained from Michael Fernandez at EPA. You will be sending your comments and approval to proceed to Michael Fernandez by the end of the day on April 14, 1988. You will be sending these comments and approval by Telex.

As a requirement of approval to proceed, two split-spoon soil samples from each trench B and C will be analyzed for the Base Neutral Acids by EPA method 8270. These samples will be taken at the 30 foot depth within each trench at locations of the highest VOC containing soils as indicated by the organic vapor analyzer, (OVA). The samples will be taken and analyzed in accordance with the proper procedures outlined in the approved RCRA Closure Plan.

Your first question was, how did we select the location of the trenches? The trench locations are based on the characterization work completed in February 1988, the eight random soil borings at the 317 Area completed in February 1988 and the soil borings and well installation completed in July 1987 at the 317 Area.

The results of this work indicate that the lateral extent of VOC containing soils extends to the north of the initial characterization trench. The extent is believed to be within the apex of the triangle formed by the initial trench and trenches B and C.

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The borings proposed as part of the additional soil characterization will be placed to confirm the lateral extent of VOC containing soils determined by the excavation procedures.

Your second question was, why are we proposing to perform further characterization prior to the installation of a series of borings and probes which are a requirement of the approved RCRA Closure Plan? The further characterization will be used to refine the extent of VOC containing soils. The boring and probes installed after this characterization will verify and further refine the extent of any remaining contamination. Prior to further characterization we have no rational for efficient placement of the borings and probes.

I trust these are the explanations that you require. If you have any questions pertaining to this matter please do not hesitate to call. We appreciate your assistance in our efforts to complete closure of this facility.

Sincerely,

WENCK ASSOCIATES, INC.

Christopher F. Thompson, P.E.

c.c. Michael Fernandez, USEPA
Gordon Louttit, Whittaker
John Peloquin, Whittaker

cft/tlm

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March 24, 1988

Mr. Alan Sorsher
Department of Health Services
Toxic Substances Control Division
107 S. Broadway, Room 7128
Los Angeles, CA 90012

Re: Bermite Division - Whittaker Corporation
22116 W. Soledad Canyon Road
Saugus, CA. 91350

Dear Mr. Sorsher:

We want to thank you for taking the time to meet with us yesterday to discuss the progress at 317 area and the proposed further characterization. During our discussion several points of clarification of our letter dated March 22, 1988 were made and are confirmed in this letter.

Upon completion of the additional trenches, B and C, a final boring and gas probe plan will be submitted to you for approval. The rationale for the placement of the borings and probes will be presented to you together with construction, sampling, analytical techniques, and related protocol. The borings will be completed to a depth of ten feet past the last organic vapor analyzer (OVA) reading to assure that we have defined the vertical extent.

In the event that the borings and probes completed in the above program are not adequate, another phase of borings and/or probes would be proposed. The work plan for this phase would be submitted to you for your approval. The data from prior phases will be used to develop the rationale for the program.

This letter also serves as the transmittal letter for two reports which were hand carried to you. These reports are entitled "Progress Report of Soil Characterization at the 317 Area" dated March 22, 1988 and "Verification Sampling Results at Selected RCRA Units" dated March 22, 1988.

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Wayzata, MN 55391

We appreciate your assistance with this work and look forward to sucessfully completing the program. Please call us with any questions you may have.

Respectfully Submitted,

Wenck Associates, INC.

Norman C. Wenck, P.E.
President

cc: Michael Fernandez, EPA

Wenck Associates, Inc.

Consulting Engineers
(612) 475-0858

March 22, 1988

Mr. Alan Sorsher
Department of Health Services
Toxic Substances Control Division
107 S. Broadway, Room 7128
Los Angeles, CA 90012

Re: Soil Characterization at 317 Former Surface Impoundment Bermite Division - Whittaker Corporation 22116 West Soledad Canyon Road, Saugus, CA 91350

Dear Mr. Sorsher:

The Work Plan for Soil Characterization at the 317 Former Surface Impoundment contained in the approved RCRA Closure Plan Modifications, requires Bermite to provide EPA and DHS with proposed locations and construction information of at least five probes for organic vapor detection after completion of the soil removal and characterization. We have completed the initial trench excavation to the 30-foot depth and the progress report of this soil characterization will be forwarded to you in a few days.

As you will see in the progress report, while we have compiled a great deal of data concerning the lateral and vertical extent of the contamination, we have not yet fully characterized the extent of the volatile organic compound (VOC) contamination. Because the full extent is not yet known, the precise locations for the proposed probes cannot be determined with certainty. We therefore, propose to perform further characterization prior to installation of the probes. Definition of the horizontal and vertical extent of the VOC is not only important to the objectives of the Closure Plan and for proper placement of the probes around the perimeter of the soils containing VOC, but is also very important for defining the downgradient well locations for the groundwater monitoring plan.

We therefore propose to perform the additional characterization in a manner similar to the characterization completed to date. As can be seen on the attached Figure 1, two additional trenches labeled B and C are proposed to the north of the existing trench.

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Trenches B and C will each be approximately 150 feet long, 10 feet wide and approximately 30 feet deep. The soils will be removed in the same manner as in the trench completed to date. After removal of the top soils to create a level surface for excavation and sampling control, approximately 6-inch lifts will be removed at at time over the complete area.

The soils will be sampled in the field with a Foxboro OVA-88 portable organic vapor analyzer. The same method of field sampling in a 12-inch deep and ½-inch diameter borehole on a 25 foot centers will be utilized to characterize the VOC content of the soils and to define the perimeter of the soils containing VOC.

The soils will be removed from the excavation area and spread on adjacent areas located north and east of the 317 area. Attachment 1 of this letter is the results of analysis of metal concentrations in the soils at the background area at Bermite and the 317 area. These results show that the metal concentrations in the soils at the 317 area are not significantly greater than the background as determined by the procedures specified in the approved RCRA Closure Plan Modifications.

In addition to the trenches B and C, it is proposed that five, 8-inch borings be completed as indicated on Figure 1. These borings will be completed to a depth of no further OVA readings. Split spoon soil samples will be taken at 10-foot intervals to characterize the organic compounds and define the vertical extent of the VOC.

A permit to remove the soil containing VOC will be requested from the South Coast Air Quality Management District (SCAQMD). It is proposed to apply for this permit and to request an exemption to SCAQMD rule 1150(c)(4) and to request permission to discharge up to 200 lbs/day of VOC from the excavated soils. It is our belief that an exemption and permission will be granted.

When the horizontal extent of VOC has been determined by the additional excavation proposed above, details of the location and construction of the gas probes will be furnished to DHS and EPA. Also at that time, a system for removing any VOC remaining below the excavation may be presented to DHS and EPA for approval. The alternatives that are envisioned at this time for this additional VOC removal are given below.

Alternative number 1 is to design and install a VOC extraction system consisting of slotted PVC well casing installed to the depth of the vertical extent with a system of headers and laterals connected to a fan and carbon filter system to remove the organics from the airstream.

Alternative number 2 is to extract the VOC in-situ. A system to perform this removal is produced by Toxic Treatments USA, Inc. This system is presently operating at San Pedro Terminal Annex, Port of Los Angeles, California. We are currently evaluating the effectiveness of this method.

Alternative number 3 is to continue to excavate the VOC containing soils from the 317 area. This method would be similar to the method proposed above for trenches B and C.

The details of the alternatives, their design, implementation and effectiveness cannot be known until further characterization of the soils at this area is complete.

Please review the above proposal and do not hesitate to call with any questions you may have. We would like to move forward with this characterization work beginning next week. Your attention to this matter is greatly appreciated.

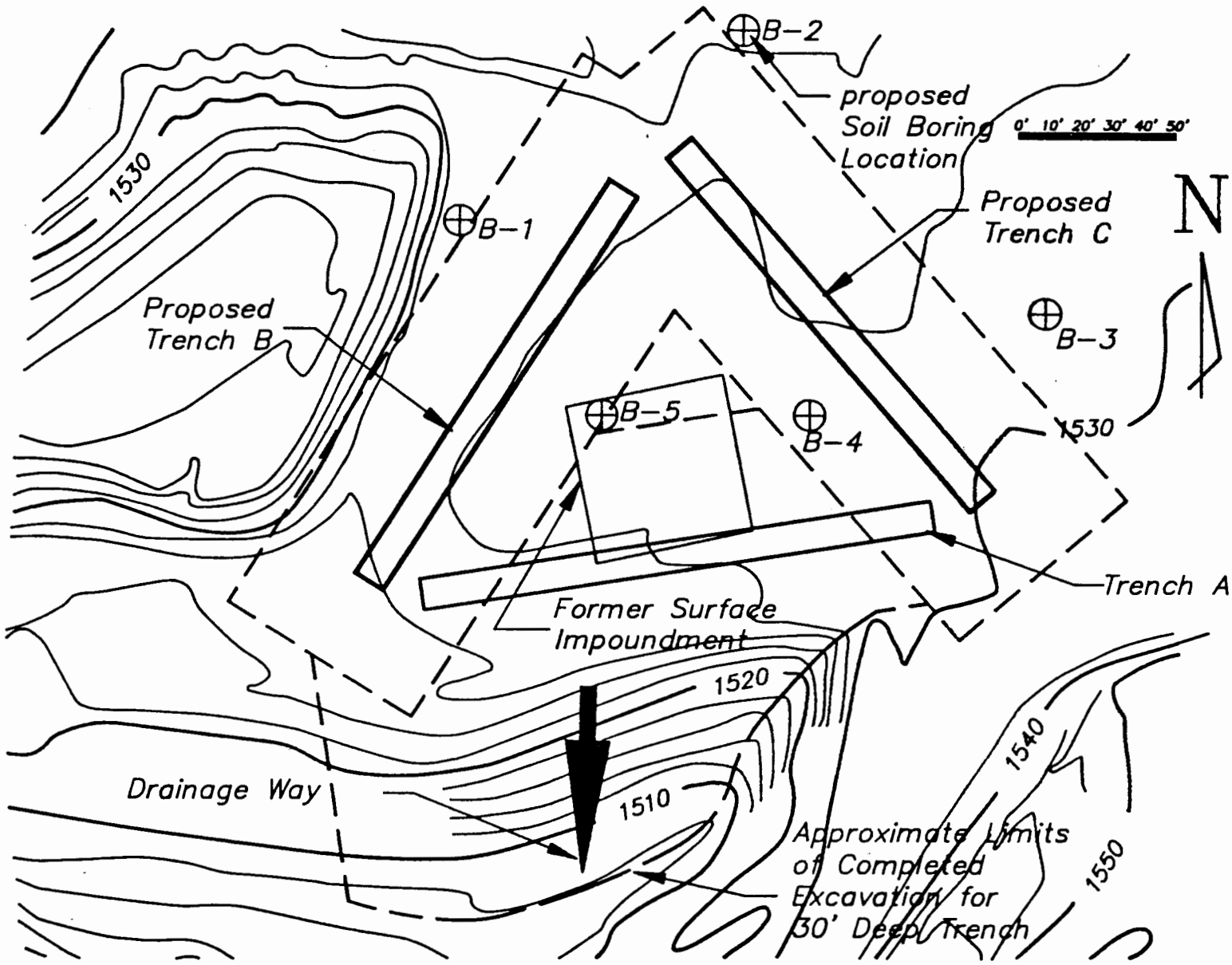
Sincerely,

WENCK ASSOCIATES, INC.

Norman C. Wenck, P.E.
President

cc: Michael Fernandez, EPA
Larry Peterson, SCAQMD
Elizabeth Lafferty, DHS

:jr



BERMITE DIVISION - WHITTAKER CORPORATION	Consulting Engineers	MAR 88
Proposed 317 Soil Characterization Plan	Wenck Associates, Inc. — Twelve Oaks Center, 15500 Wayzata Blvd., Wayzata, MN 55391	Fig. 1

ATTACHMENT 1

METAL ANALYSIS AT BACKGROUND

AREA AND 317 AREA

ANALYSIS RESULTS FROM
SOIL SAMPLING AT
RCRA UNITS

File = BACKGSOIL

TABLE 2

BACKGROUND AREA METAL CONCENTRATIONS

All Values Are mg/kg (ppm)

SAMPLE I.D.	SAMPLE DEPTH	Antimony	Arsenic	Barium	Berylium	Boron	Cadmium	Calcium	Chromium	Copper	Flouride	Lead	Magnesium	Mercury	Nickel	Selenium	Silver	Thallium
B6A-2323-1	0.0-0.5'	ND	4.0	50	ND	ND	ND	5100	ND	ND	ND	4.0	1400	ND	ND	ND	ND	ND
B6A-2323-2	0.5-1.0'	ND	3.0	ND	ND	ND	ND	3100	ND	ND	340	ND	1100	ND	ND	ND	ND	ND
B6A-2323-3	1.0-2.0'	ND	5.0	76	ND	7.0	ND	3100	ND	ND	ND	ND	3300	ND	20	ND	ND	ND
B6A-2323-4	2.0-3.0'	ND	ND	ND	ND	ND	ND	1500	ND	ND	ND	ND	960	ND	ND	ND	ND	ND
B6A-2323-5	3.0-4.0'	ND	4.0	ND	ND	ND	ND	1800	ND	ND	170	ND	1200	ND	ND	ND	ND	ND
B6A-2323-6	4.0-5.0'	ND	ND	ND	ND	ND	ND	1600	ND	ND	180	ND	1200	ND	ND	ND	ND	ND
B6A-2822-1	0.0-0.5'	ND	5.0	53	ND	6.0	ND	6200	ND	ND	420	4.0	1700	ND	ND	ND	ND	ND
B6A-2822-2	0.5-1.0'	ND	4.0	ND	ND	ND	ND	4300	ND	ND	180	12	1400	ND	ND	ND	ND	ND
B6A-2822-3	1.0-2.0'	ND	4.0	ND	ND	ND	ND	2200	ND	ND	130	ND	1700	ND	ND	ND	ND	ND
B6A-2822-4	2.0-3.0'	ND	ND	ND	ND	ND	ND	2100	ND	ND	160	ND	1100	ND	ND	ND	ND	ND
B6A-2822-5	3.0-4.0'	ND	5.0	ND	ND	ND	ND	1700	ND	ND	160	ND	1300	ND	ND	ND	ND	ND
B6A-2822-6	4.0-5.0'	ND	6.0	ND	ND	ND	ND	2000	ND	ND	110	ND	1600	ND	ND	ND	ND	ND
B6A-0115-1	0.0-0.5'	ND	5.0	52	ND	6.0	ND	4500	ND	23	390	4.0	1500	ND	ND	ND	ND	ND
B6A-0115-2	0.5-1.0'	ND	4.0	64	ND	7.4	ND	5700	ND	ND	180	4.0	1900	ND	ND	ND	ND	ND
B6A-0115-3	1.0-2.0'	ND	4.0	ND	ND	8.2	ND	5300	ND	14	380	4.0	2100	ND	ND	ND	ND	ND
B6A-0115-4	2.0-3.0'	ND	5.0	56	ND	9.0	ND	3400	ND	ND	ND	4.0	2300	ND	ND	ND	ND	ND
B6A-0115-5	3.0-4.0'	ND	4.0	ND	ND	ND	ND	2100	ND	ND	160	4.0	1100	ND	ND	ND	ND	ND
B6A-0115-6	4.0-5.0'	ND	6.0	ND	ND	ND	ND	1800	ND	ND	120	ND	1200	ND	ND	ND	ND	ND
B6A-1223-1	0.0-0.5'	ND	5.0	ND	ND	6.0	ND	3600	ND	ND	ND	ND	1600	ND	ND	ND	ND	ND
B6A-1223-2	0.5-1.0'	ND	6.0	ND	ND	6.0	ND	2100	ND	ND	270	ND	1400	ND	ND	ND	ND	ND
B6A-1223-3	1.0-2.0'	ND	6.0	ND	ND	ND	ND	1600	ND	ND	ND	ND	1500	ND	ND	ND	ND	ND
B6A-1223-4	2.0-3.0'	ND	5.0	ND	ND	ND	ND	1500	ND	ND	260	ND	1200	ND	ND	ND	ND	ND
B6A-1223-5	3.0-4.0'	ND	5.0	ND	ND	ND	ND	1900	ND	ND	ND	ND	1400	ND	ND	ND	ND	ND
B6A-1223-6	4.0-5.0'	ND	6.0	ND	ND	ND	ND	2000	ND	ND	ND	ND	1700	ND	ND	ND	ND	ND
Detection Limit		10	3.0	50	0.50	5.0	0.50	1000	50	10	100	3.0	500	0.10	10	0.50	3.0	5.0
Average Concentration		10	4.6	52	0.50	5.7	0.50	2925	50	11	184	3.7	1536	0.10	10	0.50	3.0	5.0
Upper Confidence Limit		10	4.9	54	0.50	6.0	0.50	3445	50	12	220	4.3	1710	0.10	11	0.50	3.0	5.0
Lower Confidence Limit		10	4.2	50	0.50	5.3	0.50	2405	50	10	148	3.0	1361	0.10	9.7	0.50	3.0	5.0
Standard Deviation		0.0	1.0	5.9	0.00	1.1	0.00	1487	0	2.7	103	1.8	499	0.00	2.0	0.00	0.0	0.0
Variance		0.0	1.0	35	0.00	1.3	0.00	2210652	0	7.5	10651	3.4	248730	0.00	4.2	0.00	0.0	0.0
Coefficient of Variation		0.0	22	11	0.00	20	0.00	51	0	26	56	50	32	0.00	20	0.00	0.0	0.0
Maximum Value		ND	6.0	76	ND	9.0	ND	6200	50	23	420	12	3300	ND	20	ND	ND	ND
Total Number of Samples		24	24	24	24	24	24	24	24	24	24	24	24	24	24	24	24	24

NOTE:
1) All No Detection Values (ND) Have Been Given A Value
Equal To The Detection Limit For Purposes Of Calculation
2) t = 1.714 in calculation of confidence limits

ANALYSIS RESULTS FROM
SOIL SAMPLING AT
RCRA UNITS

TABLE 3

FILE = 317DATAF

METAL CONCENTRATIONS AT 317 AREA, 0 TO 2 FEET
All Values Are mg/kg (ppm)

SAMPLE I.D.	SAMPLE DEPTH	Arsenic	Barium	Cadmium	Chromium	Lead	Mercury	Selenium	Silver
317-3369-1	0.0-0.5'	4.0	ND	ND	ND	6.0	ND	ND	ND
317-3369-2	0.5-1.0'	ND	ND	ND	ND	4.0	ND	ND	ND
317-3369-3	1.5-2.0'	5.0	ND	ND	ND	6.0	ND	ND	ND
317-3752-1	0.0-0.5'	5.0	ND	ND	ND	4.0	ND	ND	ND
317-3752-2	0.5-1.0'	4.0	ND	ND	ND	4.0	ND	ND	ND
317-3752-3	1.5-2.0'	3.0	ND	ND	ND	4.0	ND	ND	ND
317-0745-1	0.0-0.5'	4.0	ND	ND	ND	4.0	ND	ND	ND
317-0745-2	0.5-1.0'	3.0	ND	ND	ND	4.0	ND	ND	ND
317-0745-3	1.5-2.0'	ND	ND	ND	ND	ND	ND	ND	ND
317-6089-1	0.0-0.5'	4.0	ND	ND	ND	4.0	ND	ND	ND
317-6089-2	0.5-1.0'	ND	ND	ND	ND	ND	ND	ND	ND
317-6089-3	1.5-2.0'	3.0	ND	ND	ND	ND	ND	ND	ND
317-2092-1	0.0-0.5'	3.0	ND	ND	ND	4.0	ND	ND	ND
317-2092-2	0.5-1.0'	4.0	58	ND	ND	4.0	ND	ND	ND
317-2092-3	1.5-2.0'	ND	ND	ND	ND	4.0	ND	ND	ND
317-1397-1	0.0-0.5'	ND	ND	ND	ND	4.0	ND	ND	ND
317-1397-2	0.5-1.0'	5.0	ND	ND	ND	4.0	ND	ND	ND
317-1397-3	1.5-2.0'	3.0	ND	ND	ND	6.0	ND	ND	ND
317-6331-1	0.0-0.5'	4.0	54	ND	ND	4.0	ND	ND	ND
317-6331-2	0.5-1.0'	4.0	ND	ND	ND	ND	ND	ND	ND
317-6331-3	1.5-2.0'	ND	ND	ND	ND	4.0	ND	ND	ND
317-7573-1	0.0-0.5'	3.0	54	ND	ND	4.0	ND	ND	ND
317-7573-2	0.5-1.0'	4.0	ND	ND	ND	4.0	ND	ND	ND
317-7573-3	1.5-2.0'	3.0	ND	0.60	ND	4.0	ND	ND	ND
Detection Limit		3.0	50	0.50	50	3.0	0.10	0.50	3.0
Sample Average Concentration		3.6	51	0.50	50	4.1	0.10	0.50	3.0
Upper Confidence Limit		3.8	51	0.50	50	4.4	0.10	0.50	3.0
Lower Confidence Limit		3.3	50	0.50	50	3.8	0.10	0.50	3.0
Sample Standard Deviation		0.7	1.9	--	--	0.8	--	--	--
Sample Variance		0.5	3.7	--	--	0.7	--	--	--
Coefficient of Variation		20.0	3.8	--	--	20	--	--	--
Maximum Value		5.0	58	0.60	ND	6.0	ND	ND	ND
Total Number of Samples		24	24	24	24	24	24	24	24

ANALYSIS RESULTS FROM
SOIL SAMPLING AT
RCRA UNITS

TABLE 3

FILE = 317DATAF

METAL CONCENTRATIONS AT 317 AREA, 0 TO 2 FEET
All Values Are mg/kg (ppm)

SAMPLE I.D.	SAMPLE DEPTH	Arsenic	Barium	Cadmium	Chromium	Lead	Mercury	Selenium	Silver
Background Average		4.6	52	0.50	50	3.7	0.10	0.50	3.0
Background Variance		1.0	35	0.00	0	3.4	0.00	0.00	0.0
t* = test statistic		-3.9	-1.2			1.0			
t'		1.7	1.7			1.7			

NOTE:

All No Detection (ND) values have been
given a value equal to the detection limit
for purposes of calculation

Std Dev. and Var. are based on n - 1

t* = (sample avg. - background avg.)/sqrt((sample var./# samples)+background var./# samples))

If t* > t' then sample avg. ≠ background avg.

ANALYSIS RESULTS FROM
SOIL SAMPLING AT
RCRA UNITS

TABLE 4

File = 317met16

METAL CONCENTRATIONS AT 317 AREA, 16 TO 18 FEET
All Values Are mg/kg (ppm)

SAMPLE I.D.	SAMPLE DEPTH	Arsenic	Barium	Cadmium	Chromium	Lead	Mercury	Selenium	Silver
317-3369-4	16.0-16.5'	ND	52	ND	ND	ND	ND	ND	ND
317-3369-5	16.5-17.0'	ND	59	ND	22	ND	ND	ND	ND
317-3369-6	17.5-18.0'	ND	73	ND	250	ND	ND	ND	ND
317-3752-4	16.0-16.5'	ND	30	ND	7	ND	ND	ND	0.43
317-3752-5	16.5-17.0'	ND	43	ND	6	ND	ND	ND	ND
317-3752-6	17.5-18.0'	ND	39	ND	ND	ND	ND	ND	ND
317-0745-4	16.0-16.5'	ND	47	ND	ND	ND	ND	ND	ND
317-0745-5	16.5-17.0'	ND	36	ND	ND	ND	ND	ND	ND
317-0745-6	17.5-18.0'	ND	40	ND	ND	ND	ND	ND	ND
317-6089-4	16.0-16.5'	ND	69	ND	ND	ND	ND	ND	ND
317-6089-5	16.5-17.0'	ND	32	ND	7	ND	ND	ND	ND
317-6089-6	17.5-18.0'	ND	ND	ND	ND	ND	ND	ND	ND
317-2092-4	16.0-16.5'	ND	62	ND	6	ND	ND	ND	ND
317-2092-5	16.5-17.0'	ND	55	ND	6	ND	ND	ND	1.7
317-2092-6	17.5-18.0'	ND	66	ND	ND	ND	ND	ND	ND
317-1397-4	16.0-16.5'	ND	33	ND	6	ND	ND	ND	ND
317-1397-5	16.5-17.0'	ND	53	ND	8	ND	ND	ND	ND
317-1397-6	17.5-18.0'	ND	60	ND	5	ND	ND	ND	ND
317-6331-4	16.0-16.5'	ND	57	ND	ND	12	ND	ND	ND
317-6331-5	16.5-17.0'	ND	67	ND	ND	9.0	ND	ND	0.45
317-6331-6	17.5-18.0'	ND	78	ND	ND	ND	ND	ND	ND
317-7573-4	16.0-16.5'	ND	76	ND	8	ND	ND	ND	ND
317-7573-5	16.5-17.0'	ND	32	ND	7	ND	ND	ND	ND
317-7573-6	17.5-18.0'	ND	63	ND	6	ND	ND	ND	ND
Detection Limit		2.0	20	2.0	5	5.0	0.20	1.0	0.40
Sample Average Concentration		2.0	53	2.0	17	3.6	0.20	1.0	0.46
Upper Confidence Limit		2.0	58	2.0	34	4.3	0.20	1.0	0.55
Lower Confidence Limit		2.0	48	2.0	-0.8	2.9	0.20	1.0	0.37
Sample Standard Deviation		--	15	--	50	2.1	--	--	0.26
Sample Variance		--	221	--	2483	4.3	--	--	0.07
Coefficient of Variation		--	28	--	300	58	--	--	57
Maximum Value		ND	78	ND	250	12	ND	ND	1.7
Total Number of Samples		24	24	24	24	24	24	24	24

ANALYSIS RESULTS FROM
SOIL SAMPLING AT
RCRA UNITS

TABLE 4

File = 317met16

METAL CONCENTRATIONS AT 317 AREA, 16 TO 18 FEET
All Values Are mg/kg (ppm)

SAMPLE I.D.	SAMPLE DEPTH	Arsenic	Barium	Cadmium	Chromium	Lead	Mercury	Selenium	Silver
Background Average		4.6	52	0.50	50	3.7	0.10	0.50	3.0
Background Variance		1.0	35	0.00	0	3.4	0.00	0.00	0.0
t* = test statistic			0.3		-3.3	-0.1			-48
t'			1.7		1.7	1.7			1.7

Note:

All No Detection Values (ND) Have Been Given A Value
Equal To The Detection Limit For Purposes Of Calculation

Std Dev. and Var. are based on n -1

t* = (sample avg. -background avg.)/sqrt((sample var./# samples)+background var./# samples))

If t* > t' then sample avg. ≠ background avg.

Wenck Associates, Inc.

Consulting Engineers
(612) 475-0858

February 9, 1988

Mr. Greg Wood
Acting Director of Engineering
South Coast Air Quality Management District
9150 Flair Drive
El Monte, CA 91731

Re: Bermite Division, Whittaker Corporation
SCAQMD Exemption for Trenching

Dear Mr. Wood:

As requested during our telephone conversation today, I am enclosing a copy of the laboratory data from the samples that have been collected and analyzed to date for the trenching operation. It should be noted that analytical results are available from the one foot depth to the 11-1/2 foot depth. Results are available for 20 samples. The average value for each of the seven parameters that have been found to be present are highlighted in yellow and the high value for each of the parameters is highlighted in pink.

Please note that all of these samples were collected from the areas that exhibited the highest field OVA readings. You may also note that on the right-hand side of the table are laboratory results relating to the low OVA readings.

If you have any questions on this information please feel free to call me. It is hoped that your approval of this request can be made promptly.

Respectfully submitted,

WENCK ASSOCIATES, INC.

Norman C. Wenck, P.E.
President

NCW/cmk
Enclosures

832 Twelve Oaks Center
15500 Wayzata Blvd.
Wayzata, MN 55391

Bermite Division, Whittaker Corp., 317 Area Trenching

Lift	Date	Depth ft	Node High	Field OVA	Lab. Result (ppm) T12	111	ACT	TET	TCE	STR	TLN	Total	Node Low	Field OVA	Lab. Result (ppm) T12	111	ACT	TET	TCE	STR	TLN	Total
1	24-Nov-87	1	8,3	330	0.000	0.000	2.000	10.00	0.470	0.000	0.000	12.470										
2	27-Nov-87	1.5	8,3	310	0.000	0.000	0.270	0.300	0.033	0.000	0.000	0.603										
3	30-Nov-87	2	8,3	150	0.000	0.000	0.000	0.120	0.075	0.000	0.000	0.195										
4	02-Dec-87	2.5	9,3	190	0.000	0.000	2.000	0.440	0.000	0.000	0.000	2.440										
5	02-Dec-87	3	8,3	490	0.000	0.000	0.380	0.290	0.170	0.000	0.000	0.840	2,2	11	0.000	0.000	0.500	0.033	0.000	0.000	0.000	0.533
6	03-Dec-87	3.5	8,3	485	0.000	0.000	1.700	0.056	0.170	0.000	0.000	1.926										
7	04-Dec-87	4	7,3	60	1.200	0.000	0.000	0.064	0.010	0.000	0.020	1.274										
8	07-Dec-87	4.5	3,2	700	0.020	0.000	0.000	0.350	0.310	0.000	0.036	0.680										
9	08-Dec-87	5	8,3	1300	0.000	0.000	3.100	0.240	1.600	0.022	0.000	4.962										
10	09-Dec-87	5.5	7,2	3000	0.000	0.000	0.390	0.360	0.700	0.000	0.000	1.450										
11	10-Dec-87	6																				
12	11-Dec-87	6.5	5,2	4500	0.000	0.000	0.000	0.018	0.290	0.000	0.000	0.308										
13	14-Dec-87	7											7,1	25	0.000	0.000	0.000	0.000	0.006	0.000	0.015	0.021
14	15-Dec-87	7.5	7,3	7000	0.000	0.000	0.000	0.150	0.019	0.021	0.000	0.190										
15	21-Dec-87	8	5,2	10000	0.000	0.000	0.000	0.000	0.057	0.000	0.000	0.057										
16	22-Dec-87	8.5	8,3	1000	0.000	0.000	0.000	0.040	0.000	0.000	0.000	0.040										
17	22-Dec-87	9	5,2	1200	0.000	0.000	0.000	0.000	0.005	0.023	0.000	0.028										
18	23-Dec-87	9.5	5,2	2000	0.000	0.000	0.210	0.009	0.077	0.011	0.000	0.307	8,1	20	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
19	04-Jan-88	10	5,2	3000	0.000	0.000	0.000	0.050	0.130	4.600	0.050	4.830	8,1	20	0.000	0.000	0.000	0.005	0.005	0.000	0.000	0.010
20	06-Jan-88	10.5	5,2	3000	0.000	0.000	0.000	0.000	0.000	0.009	0.000	9.000										
21	07-Jan-88	11	5,2	10000	0.000	0.052	0.000	0.210	1.800	0.052	0.000	2.114	9,1	20	0.000	0.000	0.190	0.000	0.000	0.000	0.000	0.190
22	07-Jan-88	11.5	6,3	1300	0.045	0.009	0.000	2.100	1.100	0.120	0.000	3.374	9,1	5	0.000	0.000	0.000	0.096	0.068	0.000	0.017	0.181
23	11-Jan-88	12	5,2	8000									5,1	200								
24	11-Jan-88	12.5	5,2	220									9,1	15								
25	12-Jan-88	13	5,2	350																		
26	13-Jan-88	13.5	5,2	3000																		
27	14-Jan-88	14	5,2	1200									9,1	10								
28	14-Jan-88	14.5	5,2	5000																		
29	15-Jan-88	15																				
30	15-Jan-88	15.5											7,1	5								
31	18-Jan-88	16	5,2	4000																		
32	19-Jan-88	16.5											7,1	7								
33	19-Jan-88	17	5,2	4000																		
34	20-Jan-88	17.5											7,1	20								
35	20-Jan-88	18	6,3	9000																		
36	21-Jan-88	18.5	6,3	8000									7,1	10								
37	21-Jan-88	19	6,3	9000																		
38	22-Jan-88	19.5											7,1	15								
39																						
40																						
Count		38	31	31	20	20	20	20	20	20	20	20	14	14	6	6	6	6	6	6	6	6
Average				3283.	0.063	0.003	0.503	0.740	0.351	0.243	0.005	2.354		27.35	0.000	0.000	0.115	0.022	0.013	0.000	0.095	0.156

Legend

OVA: Foxboro Organic Vapor Analyzer
T12: Trans-1,2-Dichloroethylene
111: 1,1,1-Trichloroethane
ACT: Acetone
TET: Tetrachloroethylene
TCE: Trichloroethylene
STR: Styrene
TLN: Toluene

Wenck Associates, Inc.

Consulting Engineers
(612) 475-0858

February 4, 1988

Mr. Alan Sorsher
Department of Health Services
Toxic Substances Control Division
107 South Broadway, Room 7128
Los Angeles, CA 90012

Re: Bermite Division, Whittaker Corporation
Trenching activities at the 317 Former
Surface Impoundment

Dear Mr. Sorsher:

In connection with the soil excavation at the 317 area we request a change to the Closure Plan. This change will have no effect on the overall plan objectives, methods and analysis results. The change pertains to the disposition of the soils excavated from the trench which have OVA readings greater than 500 ppm.

Under the current plan, all soils excavated to date, with OVA readings greater than 500 ppm, have been shipped directly to a hazardous waste landfill. We are proposing there be a change to this procedure for the additional soils. Instead of using up valuable space within a hazardous waste landfill these soils can be left on site. In this age of scarce and diminishing landfill space, we feel our proposal is a prudent one.

As you may recall, an exemption was granted by the SCAQMD on September 29, 1987 which allowed the emission of volatile organic hydrocarbons (VOC) from the 317 trench. Under our present proposal an additional 10 lbs. of VOC will be emitted. While in production, Bermite had permits to emit over 500 lbs. per day of VOC.

Our proposal is as follows:

The soils with vapors exceeding 500 ppm will be removed immediately upon excavation. These soils will be thin spread on asphalt pads located to the northwest of the 317 area. The soils will be tilled periodically for up to two weeks to volatilize the organic compounds. While we expect that most of the organic materials will volatilize from the soils, after two weeks, soils that still emit vapors greater than 500 ppm, as measured by a field OVA meter, will be shipped to a hazardous waste landfill.

By substituting the above paragraph in place of the first sentence of paragraph 4, pg. 4, rev. 1.1 of the 317 Work Plan within the approved Closure Plan, one can see that this proposal fits logically into the approved plan and does not alter its intent.

832 Twelve Oaks Center
15500 Wayzata Blvd.
Wayzata, MN 55391

Wenck Associates, Inc.

Consulting Engineers
(612) 475-0858

Enclosed you will find a copy of our letter to the SCAQMD requesting an extension of our exemption from the trenching regulations of Dist. Rule 1150.

Please review this proposal and call us with any questions you may have. We would like approval by Monday, February 8 so that we may proceed with the trenching activities as scheduled.

Your prompt attention to this matter is appreciated.

Sincerely,

WENCK ASSOCIATES, INC.

Christopher F. Thompson, P.E.

CFT/cmk
Enclosure

cc. Gordon Louttit - Whittaker
Michael Fernandez - EPA

832 Twelve Oaks Center
15500 Wayzata Blvd.
Wayzata, MN 55391

Wenck Associates, Inc.

Consulting Engineers
(612) 475-0858

February 3, 1988

Mr. Greg Wood
Acting Director of Engineering
South Coast Air Quality Management District
9150 Flair Drive
El Monte, CA 91731

Re: Bermite Division, Whittaker Corporation
SCAQMD Exemption for Trenching

Dear Mr. Wood:

On September 29, 1987 the SCAQMD granted Bermite Division, Whittaker Corporation an exemption pursuant to Rule 1150(c)(4) for the excavation process undertaken under an approved Resource Conservation and Recovery Act (RCRA) Closure Plan for the Bermite facility. The purpose of this excavation was to remove soils, some of which contained detectable amounts of organic compounds.

We herein request an extension to the granted exemption for the purpose of further DHS and EPA approved excavation. As a result of the initial excavation, further definition of the nature and extent of the organic compounds has been made. The excavation is now at the 20 foot depth and preparations have been made to excavate for an additional 10 feet.

The additional excavation will total approximately 1100 cubic yards. Based upon the average concentration of organic compounds from the laboratory analyzed samples taken from the excavation to date, it is estimated that the 1100 cubic yards contain approximately 10 lbs of volatile organic hydrocarbons. The main organic compound found in the soils is tetrachloroethene with smaller amounts of acetone and trichloroethylene.

Our intent is to remove the soils from the ground and thin spread the soils on asphalt pads to volatize the organic compounds. We expect the further trenching activities to take four to six weeks.

We will comply with all requirements stated in the original exemption of September 28, 1987.

832 Twelve Oaks Center
15500 Wayzata Blvd.
Wayzata, MN 55391

Wenck Associates, Inc.

Consulting Engineers
(612) 475-0858

Your prompt attention to this matter is appreciated as we would like to proceed with our approved closure schedule as soon as possible. If you have any questions pertaining to this request please do not hesitate to call.

Sincerely,

WENCK ASSOCIATES, INC.

Christopher F. Thompson, P.E.

CFT/cmk

cc: Gordon Louttit, Whittaker
Michael Fernandez, EPA
Alan Sorsher, DHS

832 Twelve Oaks Center
15500 Wayzata Blvd.
Wayzata, MN 55391

Wenck Associates, Inc.

Consulting Engineers
(612) 475-0858

November 13, 1987

Mr. Alan Sorsher
Department of Health Services
Toxic Substances Control Division
107 So. Broadway, Room 7128
Los Angeles, CA 90012

Re: Bermite Division
Whittaker Corporation
Saugus, California

Dear Mr. Sorsher:

As requested during your meeting with Norm Wenck and John Peloquin on November 12, 1987 the following detailed information is enclosed for your information and review: detailed information on the trenching plan for the 317 area, justification for the background sampling locations and revision of the Appendix A of the sampling plan (Appendix VIII constituents).

We appreciate your assistance working with us to resolve these remaining issues. As agreed upon during the meeting of November 12, 1987, work is scheduled to be initiated at Bermite the week of November 16, 1987. I plan to be on site during the week of the 16th. If you have any questions or would like to be on site, please call me at Bermite at (805) 259-2241.

Sincerely,

WENCK ASSOCIATES, INC.

Christopher F. Thompson, P.E.

CFT/cmk
Enclosures

cc: Michael Fernandez, EPA
Gordon Louttit, Whittaker
John Peloquin

832 Twelve Oaks Center
15500 Wayzata Blvd.
Wayzata, MN 55391

JUSTIFICATION FOR BACKGROUND SAMPLING LOCATIONS

The background area selected is located 400 feet northeast of the Burn Cage, Pans and Rails area. The elevation of the background area is approximately 1515 feet, or approximately 40 feet higher than the Burn Cage, Pans and Rails area. The background area selected is also located southeast of the East Fork area, approximately 500 feet. There is a large hill separating the two areas which rises approximately 100 feet above the background area.

The area selected for the background sampling is a non-industrial area which was seldom used for any activities. The area is in the same geological formation as the other waste management areas and like most of the other areas is located at the head of a valley. Because it is located in its own valley and is not directly downgradient from any of the waste management areas, it is isolated from any effects that these areas may have had on their immediate surroundings. The area is accessible for performing the sampling required.

40 CFR 261 APPENDIX VIII HAZARDOUS CONSTITUENTS TO BE TESTED FOR

The following compounds have been selected from Appendix VIII of 40 CFR 261 as having been possibly used during production and/or research and development at the Bermite facility. The complete list of Appendix VIII constituents was reviewed by the former chief chemist and the former vice president of research and development of Bermite. According to these experts, the compounds from Appendix VIII not listed below were not used or created at Bermite, nor are they products of reaction or products of degradation.

Antimony Compounds (NOS) - Antimony Trisulphide

Barium Compounds (NOS) - Barium Nitrate

Benzene

Beryllium

Butyl Acetate

Calcium Chromate

Carbon Disulfide

Chloroform

Dichloromethane

Dinitrobenzene

Diphenylamine

Formaldehyde

Hexachloroethane

Hydrofluoric Acid

Isobutyl Alcohol

Lead Compounds (NOS) - Lead Azide, Lead Styphnate, Lead

Methyl Ethyl Ketone

Methyl Methacrylate

Naphthalene

Nickel

Oxides

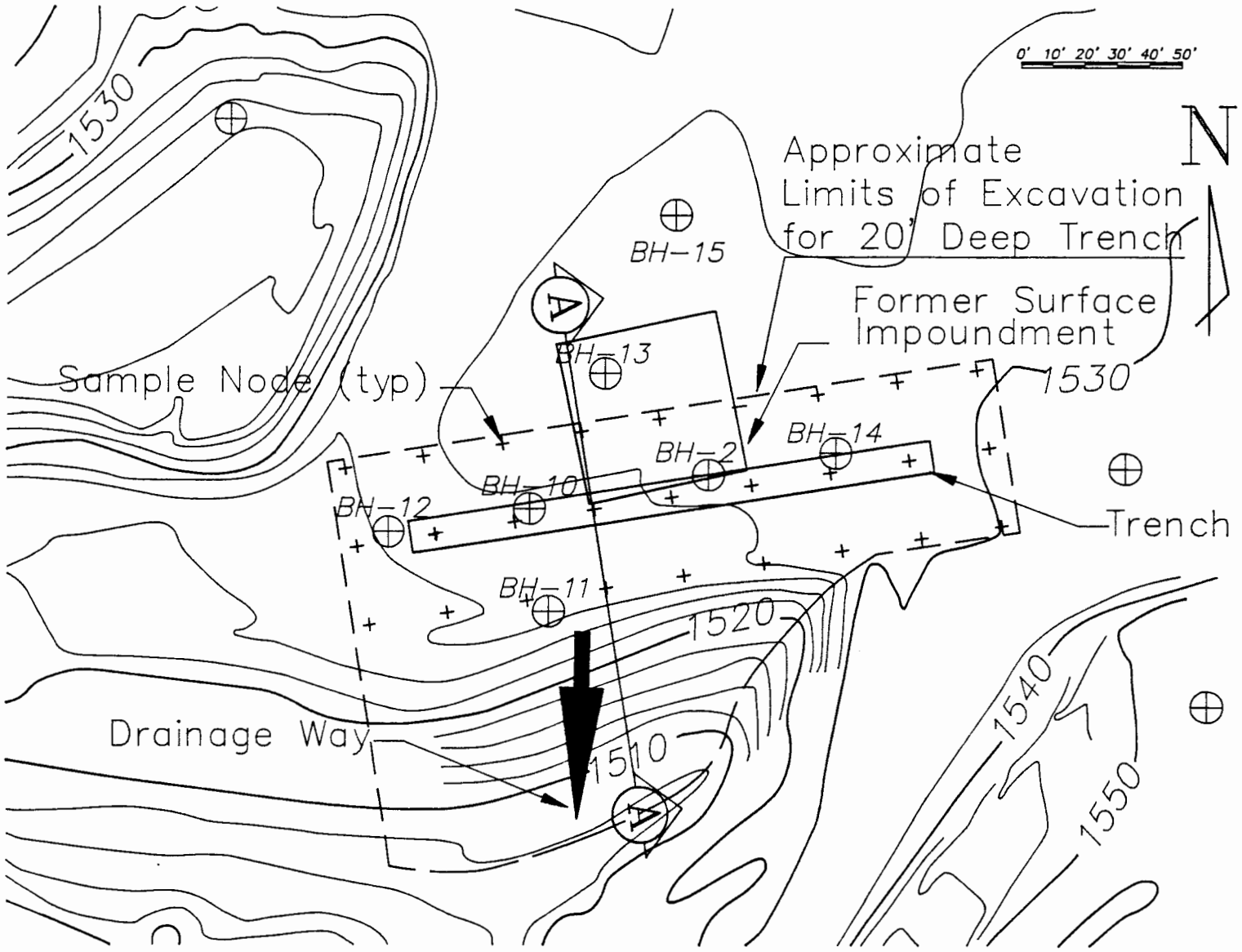
Potassium Cyanide

Potassium Perchlorate

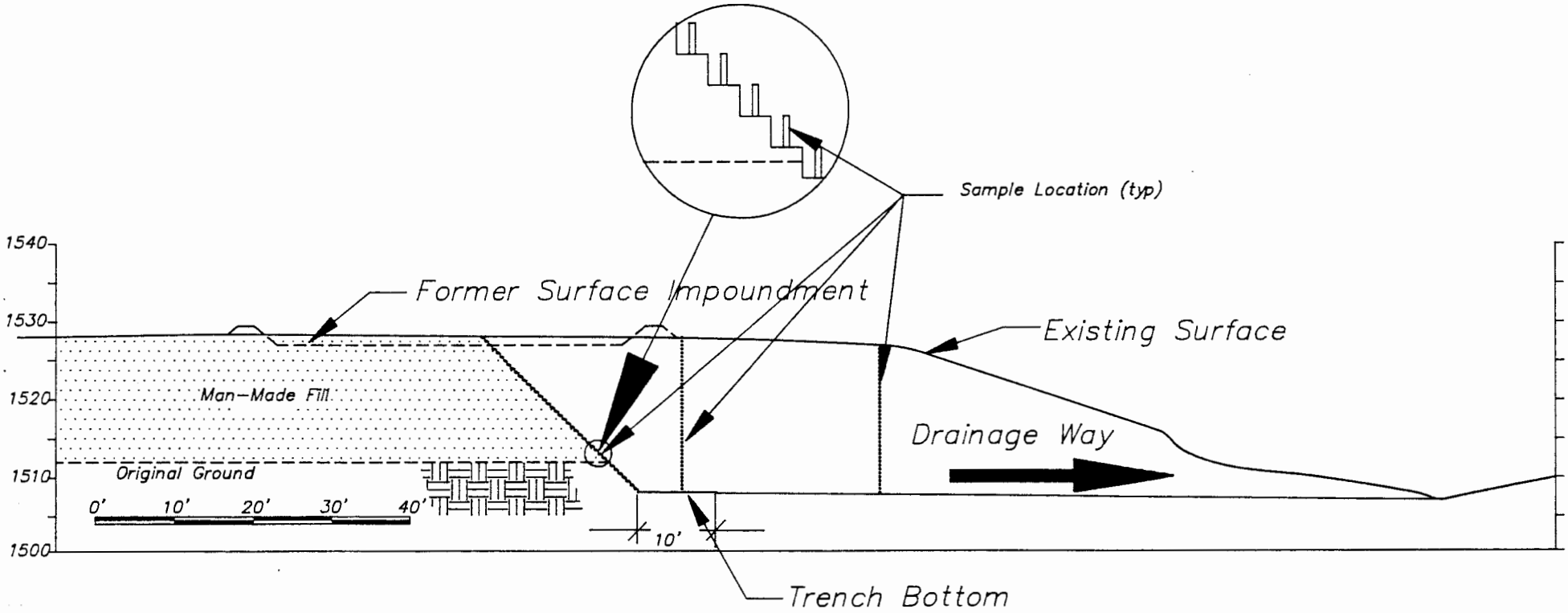
Thallium

Toluene

1,1,1-Trichloroethane



Bermite Division - Whittaker Corporation	Consulting Engineers	Nov. 87
317 Area Soil Removal - Limits of Excavation	Wenck Associates, Inc. — Twelve Oaks Center, 15500 Wayzata Blvd., Wayzata, MN 55391	Fig. 1



Bermite Division - Whittaker Corporation	Consulting Engineers	Nov. 87
317 Area Soil Removal - Limits of Excavation	Wenck Associates, Inc. Twelve Oaks Center 15500 Wayzata Blvd. Wayzata, MN 55391	Fig. 1A

Wenck Associates, Inc.

Consulting Engineers
(612) 475-0858

October 15, 1987

Mr. Alan Sorsher
California Department of Health Services
Toxic Substances Control Division
107 South Broadway, Room 7001
Los Angeles, California 90012

Re: Results of Physical Tests Performed on Soil Samples from the 342 and 317 Borings

Dear Alan:

Please find enclosed for your review the results to date of the physical tests that were performed on selected samples from the borings at 342 and 317. The samples were chosen as representative of the different soil horizons seen on the boring logs. There are four samples that are still being tested for permeability. We will forward the complete results of the sieve analysis, plasticity and permeability as they become available.

If you have any questions regarding these results, please do not hestitate to call.

Sincerely,

WENCK ASSOCIATES, INC.

Christopher F. Thompson, P.E.

CFT/msw
Enclosures

cc: Elizabeth Lafferty, DHS
Larry Peterson, RWQCB
Michael Fernandez, EPA
Gordon Louttit, Whittaker

832 Twelve Oaks Center
15500 Wayzata Blvd.
Wayzata, MN 55391

RECEIVED BY
WENCK ASSOCIATES INC.
OCT 14 1987

pioneer consultants
251 TENNESSEE STREET • REDLANDS, CALIFORNIA 92373
(714) 793-2691

TO: Wenck and Associates
832 Twelve Oaks Center
15500 Wayzata
Wayzata, Minnesota 55391

DATE: October 13, 1987

JOB NO. 4257-001

RE: Bermite Facility
Saugus, California

ATTENTION: Mr. Norman C. Wenck, P.E.
President

WE TRANSMIT TO YOU [ ] SEPARATELY [X] ENCLOSED THE FOLLOWING: Results of laboratory testing performed on six samples of soil obtained by our representative from the referenced site.

PURPOSE:

- [X] FOR YOUR USE
- [ ] FOR CHECKING
- [ ] FOR APPROVAL
- [X] AS REQUESTED
- [ ] WORK ORDER
- [ ] APPROVED
- [ ] APPROVED AS NOTED
- [ ] RETURNED FOR CORRECTION
- [ ] FOR REVIEW AND COMMENT
- [ ]

REMARKS:

The following tests were performed in our laboratory: 4 sieve analyses, 1 plasticity index/soil classification and 6 permeability tests. We will forward test results on the remaining samples as they become complete.

CC: _____ [ ] W/ENC [ ] WO/ENC

_____ [ ] W/ENC [ ] WO/ENC

pioneer consultants

BY Allen D. Evans

Allen D. Evans
Project Engineer

Sample Location	Depth (feet)	Percent Passing Individual Sieve 3/4"	1/2"	3/8"	#4	#10	#20	#40	#100	#200
BH-6	70.0- 70.5			95	84	67	48	31	15	9
BH-10	19.0- 19.5		96	93	90	82	66	49	28	19
BH-13	65.5- 66.0	100	95	93	78	59	38	25	14	9
BH-14	130.0-130.5			100	79	67	57	50	38	27

Sample Location	Depth (feet)	Plasticity Index	Unified Soil Classification
BH-13	65.5-66.0	Nonplastic	SW-SM

Sample Location	Depth (feet)	Density (pcf)	Moisture (percent)	Permeability (centimeters/second)
BH-6	70.0- 70.5	89.2	6.6	1×10^{-3}
BH-10	19.0- 19.5	120.3	11.2	2×10^{-7}
BH-13	35.0- 35.5	84.5	7.1	6×10^{-4}
BH-13	65.5- 66.0	98.0	6.1	1×10^{-3}
BH-13	110.0-110.5	-	-	6×10^{-4}
BH-14	130.0-130.5	-	-	1×10^{-3}

RESULTS OF LABORATORY TESTING

PREPARED BY: ljs	Bermite Facility Saugus, California for Wenck Associates, Inc.			EXHIBIT NUMBER
CHECKED BY: ADE				1
APPROVED BY: DWT	DATE: 10/87	SCALE:	JOB NUMBER:	4257-001

Pioneer Consultants

Consulting Engineers and Geologists

Wenck Associates, Inc.

Consulting Engineers
(612) 475-0858

October 9, 1987

Mr. Alan Sorsher
Department of Health Services
Toxic Substances Control Division
107 S. Broadway, Room 7128
Los Angeles, California 90012

Re: 317 Area Soil and Groundwater Monitoring Plan
Bermite Division, Whittaker Corporation
Saugus, California

Dear Alan:

Pursuant to our discussions this week in San Francisco and Los Angeles, please find enclosed detailed plans and specifications for the excavation of soils of the 317 area. Included at your request is a grid showing the locations where soil samples will be taken for headspace analysis. We have also designed the excavation plan in accordance with the changes and suggestions that you gave to us over the telephone October 8, 1987.

We have indicated in the plan that vapor probes will be attempted to be driven to help determine the presence and extent of possible organic vapors. The location and details of these probes will be determined by the results of the excavation and in consultation with EPA and DHS.

Also enclosed is the Revised Groundwater Monitoring Plan for your review and comment.

As discussed in our meeting on October 6 in Los Angeles, we are proceeding with the excavation of the 317 area. If you have any further questions or concerns please feel free to call us.

Sincerely,

WENCK ASSOCIATES, INC.

Christopher F. Thompson, P.E.

CFT/msw
Enclosure

cc: Gordon Louttit, Whittaker
John Peloquin
Michael Fernandez, EPA
John Harris, DHS
Elizabeth Lafferty, DHS
Larry Peterson, RWQCB

832 Twelve Oaks Center
15500 Wayzata Blvd.
Wayzata, MN 55391

REVISED GROUNDWATER MONITORING PLAN
FOR THE 317/342 AREA
BERMITE DIVISION WHITTAKER CORPORATION

FOR THE
BERMITE DIVISION FACILITY
22116 WEST SOLEDAD CANYON ROAD
SAUGUS, CALIFORNIA 91350

PREPARED BY
WENCK ASSOCIATES, INC.
832 TWELVE OAKS CENTER
15500 WAYZATA BOULEVARD
WAYZATA, MINNESOTA 55391-1418
612-475-0858
OCTOBER 8, 1987

October 8, 1987

REVISED GROUNDWATER MONITORING PLAN FOR THE 317/342 AREA BERMITE DIVISION WHITTAKER CORPORATION

I. GENERAL

A groundwater monitoring system is proposed to be installed at the 317/342 area of the Bermite facility located in Saugus, California. A report entitled "Subsurface Investigative Program" dated July 28, 1987 presents a hydrologic assessment of the area and presents the findings of a soil boring program performed in June and July of 1987.

Two wells were constructed (68 feet deep at the 342 area and 301 feet deep at the 317 area) with no measurable groundwater. Apparently an attempt was made in the early 1960's to construct a water production well on the upper area of the plant with no success to a depth of 500 to 600 feet.

Preparations for the proposed wells are being made with a final depth of up to 1,000 feet in mind. The primary objective of the system is to determine the quality of the groundwater in the study area. The characteristics of the aquifer will be attempted to be defined including direction of flow, rate of flow, and estimated hydraulic conductivity. The program is viewed as progressive, in that following steps will use the data and information from the early steps to refine the plan. The location of the facility and the 317/342 area are shown on Figure 1. Figure 2 shows the detailed locations of the 317 and 342 areas and the locations of the previous work described in the above report.

II. PROPOSED MONITORING WELL LOCATIONS

The proposed locations of the first two wells to be constructed are shown as W-1 and W-2 on Figure 3. Possible locations of the third well is shown as W-3A and W-3B. The location of the latter well will be dependent on the findings of the first two wells. The location of well W-1 was chosen as a possible upgradient and background well. It is approximately 200 feet from the 317 area and in an area where little plant activity took place. It is also located at some distance from the anticipated trenching area.

What sort of activity?

Well W-2 is located approximately 250 feet southwest of the 342 area. This location is thought to be downgradient from the well W-1 location, however once these first two wells are installed, this will be verified. The location of well W-3 will be selected in consultation with the staffs of DHS, EPA and RWQB. Two possible locations are shown on Figure 3 and are a minimum of 300 feet from the other wells. This is considered a minimum horizontal separation in view of the depth to groundwater.

III. WELL CONSTRUCTION

The well construction methods and materials are proposed below and may vary depending on the field conditions encountered. Changes to this plan will be discussed with the DHS, EPA and RWQB before they are implemented. The wells will be constructed with the bentonite mud rotary method using equipment similar to a Chicago Pneumatic model 650 ws. The drilling mud will be analyzed prior to use for the parameters of concern as listed in Section V below.

Figure 4 shows the general planned construction details of the wells. The borehole will be approximately 10 inches in diameter 20 feet into the uppermost aquifer. Samples for later sieve analysis will be collected at each change in formation. Upon reaching the final depth, the borehole will be electric-logged to confirm the interval to be screened. Sieve analysis will then be performed on the interval of interest. The gravel pack and well screen size will then be selected.

Thirty feet of 4 inch diameter stainless well screen is planned with approximately ten feet of screen placed above the anticipated water level. The screen will be welded to the black iron casing to be installed to 3 feet above the ground surface. The gravel pack will be placed by the tremie method to five feet above the screen. The annular space will then be grouted with neat cement grout by the tremie method to the surface. The annular space will be refilled the day following the initial grout placement to insure that the annular space is filled to the surface. At the same time a protective casing with locking cap and three 4" diameter protective posts will be installed. The well will be developed using the surge block or equivalent method for a minimum of four hours in order to ensure a good hydraulic connection to the aquifer.

The drilling mud will be sampled and analyzed for metals and VOC's and will be properly disposed of.

IV. SAMPLING

It is proposed to install a dedicated submersible pump in each well. The pumps proposed are Grunfus model SP1-60DS or equivalent which are capable of pumping 4 gpm at a TDH of 1,070 feet. The pumps will be constructed of stainless steel, the drop pipe will be one inch diameter black iron pipe with threaded fillings. The pumps will be used for both purging the casing of standing water, if any, and taking the samples. A minimum of five volumes of water present in the casing will be removed before sampling and also the temperature and the specific conductance of the water will be stable before the sample is taken. Quarterly samples will be taken in clean containers as provided and specified by the certified analytical laboratory and their QA/QC plan, all in accordance with the RCRA Closure QA/QC plan.

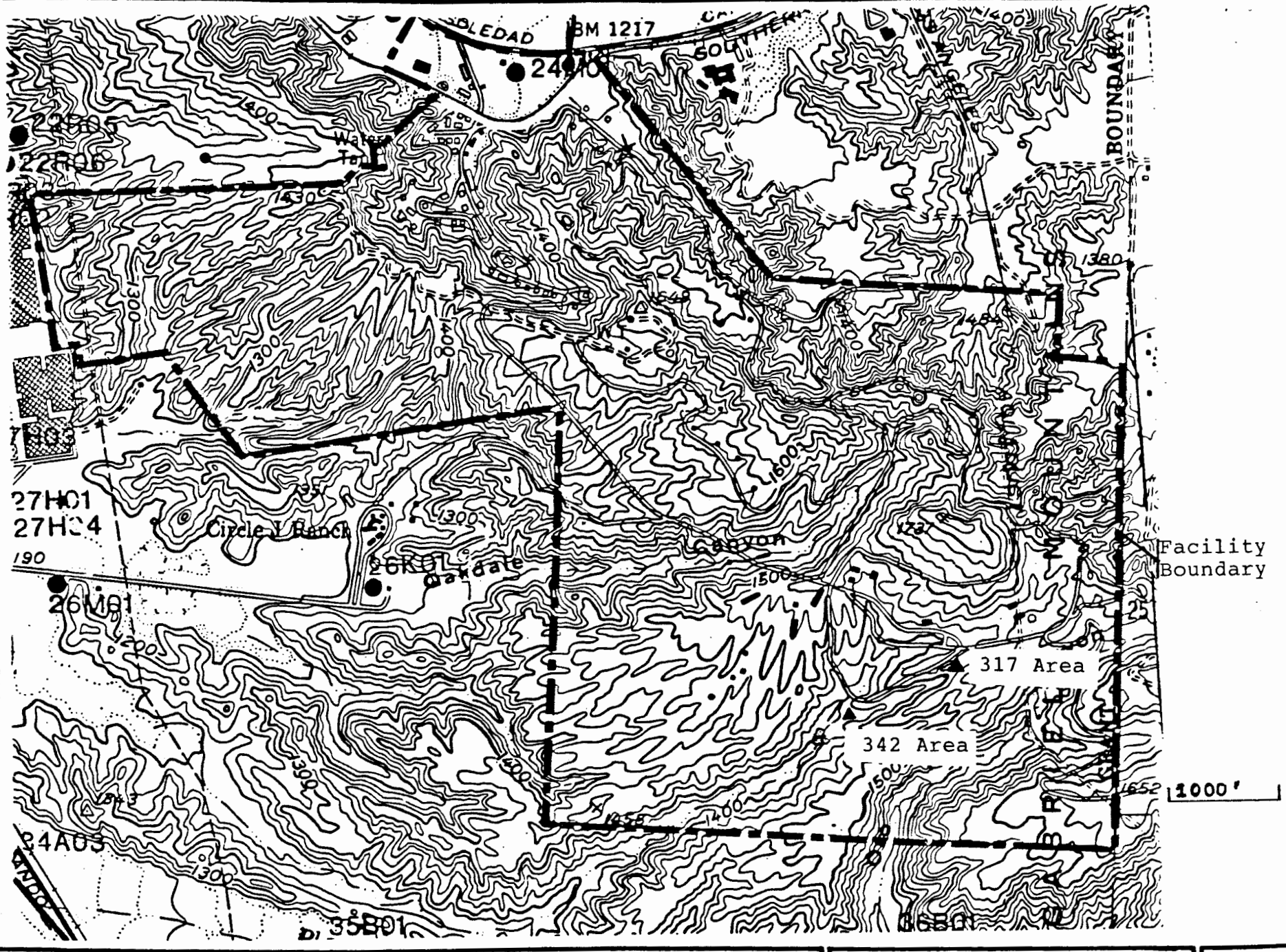
V. ANALYSIS

The samples will be analyzed at a certified analytical laboratory in accordance with the QA/QC plan for the parameters of interest as listed below:

Volatile Organics	Methods 8010, 8015, 8020
Eight RCRA Methods	Methods 7060, 7080, 7131, 7191,7424, 7760, 7470, 7740

The results of the analyses will be presented to the DHS, EPA and RWQB within twenty one days of sample collection. The report will include the signed laboratory sheets together with the required QA/QC documentation.

Future monitoring events may be modified based on the results of prior analytical results.



BERMITE DIVISION, WHITTAKER CORPORATION

Bermite Facility and Location of the 317 and 342 Areas

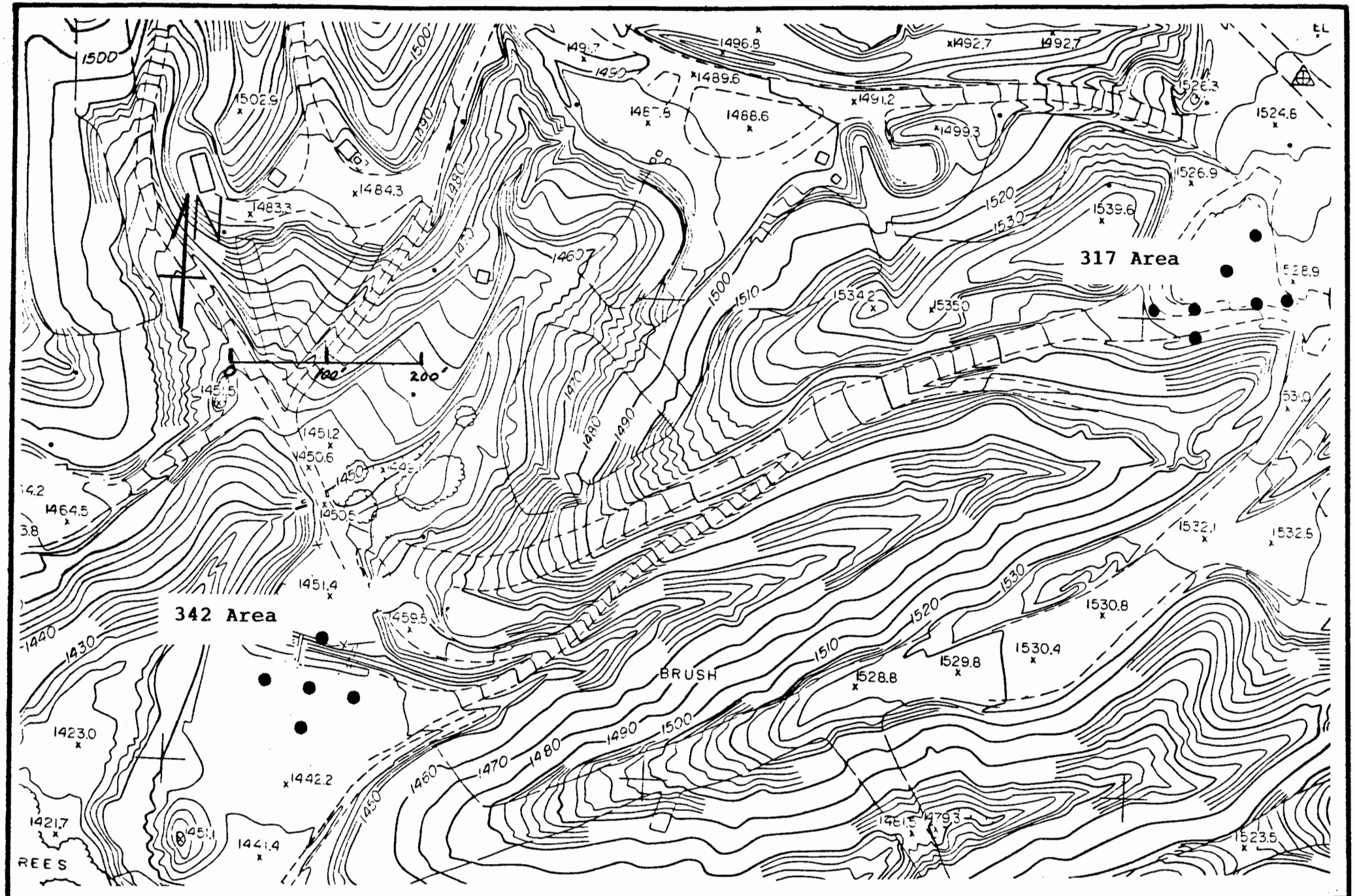
Consulting Engineers

Wenck Associates, Inc.

Twelve Oaks Center
15500 Wayzata Blvd.
Wayzata, MN 55391

OCT 87

Fig. 1



BERMITE DIVISION - WHITTAKER CORPORATION

317 and 342 Areas With Locations of Initial Soil Borings

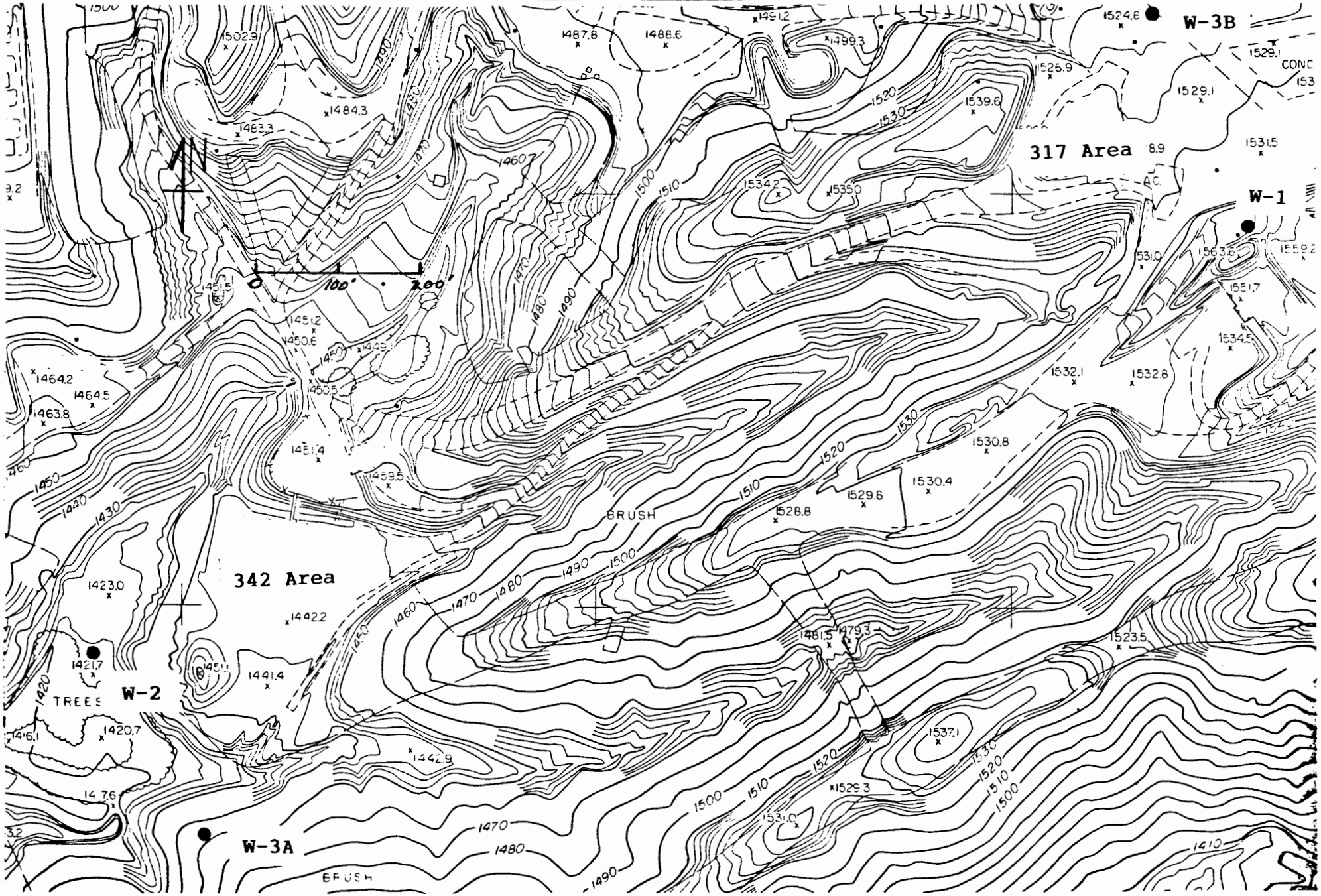
Wenck Associates, Inc.

Consulting Engineers

Twelve Oaks Center
15500 Wayzata Blvd.
Wayzata, MN 55391

OCT 87

Fig. 2



BERMITE DIVISION - WHITTAKER CORPORATION

Proposed Locations of Groundwater Monitoring Wells for 317 and 342 Areas

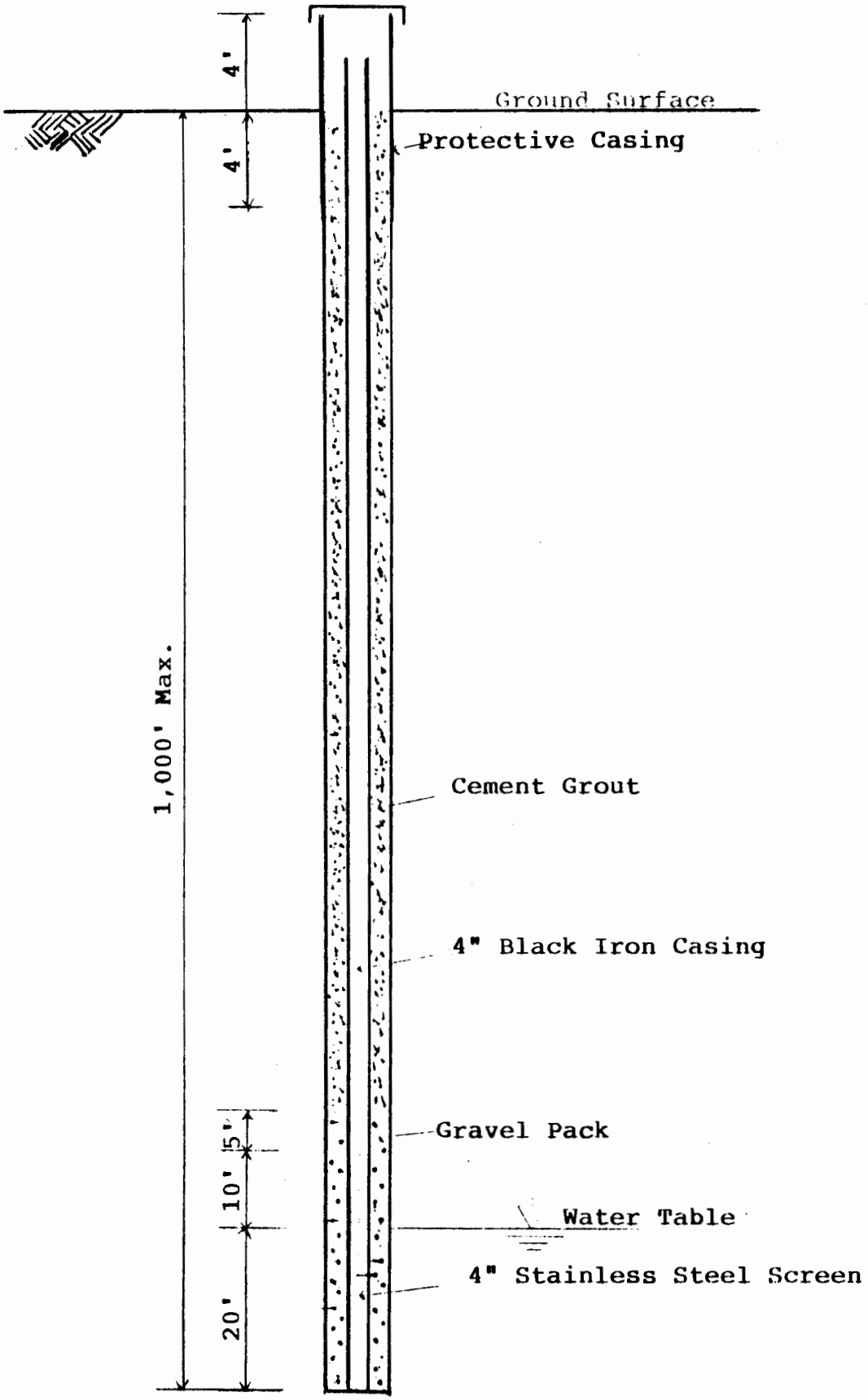
Consulting Engineers

Wenck Associates, Inc.

Twelve Oaks Center
15500 Wayzata Blvd.
Wayzata, MN 55391

OCT 87

Fig. 3



BERMITE DIVISION-WHITTAKER CORPORATION	Consulting Engineers	OCT 87
317 and 342 Monitoring Well Construction Detail	Twelve Oaks Center 15500 Wayzata Blvd.	Fig. 4

October 9, 1987

317 WORK PLAN FOR SOILS INVESTIGATION AND REMOVAL AT THE 317 AREA BERMITE DIVISION, WHITTAKER CORPORATION SAUGUS, CALIFORNIA

1. INTRODUCTION

The soil borings and chemical analysis of soil samples from the 317 former surface impoundment completed in July 1987 indicate that there are some levels of trichloroethene (TCE) and 1,2-dichlorobenzene (DCB) present in the subsurface soils. The results of the investigation are presented in an earlier report titled "Subsurface Investigative Program, Whittaker Corporation, Bermite Facility, Saugus, California, July 28, 1987. The greatest concentration found in the analysis is 24 ppb. During the boring and sampling work, low levels of organic vapors were also detected (up to 500 ppm). It is proposed that the possible source(s) of these organic compounds be determined and removed if they exist. This determination and removal is proposed to be accomplished by uncovering the subsoils, locating the source(s) and treating or disposing of the soils or source(s).

2. PURPOSE

The purpose of removing the soils is to determine possible source(s) of the contamination and to remove the contamination so that it does not pose a threat to human health or the environment.

3. PLAN

The soils will be excavated from the 317 area in approximately 6 inch lifts after the top 12 inches of asphalt and compacted surface soils are removed. Sampling of the soils to be removed will take place prior to removal for the purpose of segregating the soils into piles as follows: no vapors up to 50 ppm, soils with vapors up to 500 ppm and soils with vapors greater than 500 ppm. Eight total piles will be created from the excavated soils. Each of the four soil horizons given below will be separated into two piles on the basis of the OVA readings given above:

0' - 2'
2' - 16'
16' - 18'
18' - 20'

The soils with vapors exceeding 500 ppm will be disposed of as hazardous waste immediately upon excavation. The other soils may be tested further for metal concentrations. The eight piles will be placed on plastic to the east of the 317 area.

October 9, 1987

An area app y 165 feet will be excavated to a depth of ap This area will be extended as necessary t zontal extent of any volatile organics. xcavation can be seen on Figure 1. A grid ll be used to create nodes for sampling the al. A 125 ml sample will be taken at eac nto a 250 ml jar. After 15 minutes the centration will be taken in each sample container.

Phase this approach; 50' length initially

Soil samples will be obtained by hand coring. A 12" core will be taken and the soil to be analyzed will be taken from the lower 6" of the sample core. The coring tool will be cleaned between each sampling in accordance with the procedures outlined in the QA/QC section of the revised RA Closure Plan. Continuous field monitoring wit A or equivalent between nodes on the grid will be pe urther define the limits of possible organic cont results of relative concentrations will b ed drawing of the area. This will the ich soils will be disposed of immediate which soils will be tested further for met

Background sampling satisfactory?

Split samples will be t lift. A sample with a relatively high OVA read selected from each lift. Samples with low or non-d le readings will also be selected from the lift to sure that a total of 5% split samples are taken. These samples will be analyzed in accordance with the QA/QC procedures outlined in the approved Revised Closure Plan. The samples will be analyzed in accordance with EPA method 8240. The results will be correlated with the field results to verify the procedures.

The soils which are left on-site will be graded into piles approximately 3 feet thick. They will be covered with plastic. These soils will then be randomly tested for the metals determined during the initial soil borings. The results of this analysis will be compared to the metal concentrations determined in the background samples taken at the burn area. If the metal concentrations are not significantly higher than the background, then the soils will be disked to volatize any remianing organic vapors. The necessary approval will be obtained for this work.

After the 20 foot depth is reached, further sampling of the near surface soils will be undertaken to determine if the extent of the organics and metals (if comparison with background warrants), has been determined. Samples will be collected at the nodes and will be analyzed for volatile organics per EPA method 8240 and will be analyzed for the 8 heavy metals and will be compared to the background values. If the vertical extent has not been determined, further excavation will be undertaken

for another approximately 10 feet. This excavation will be undertaken in the same manner as the first 20 feet. If upon further testing of the soils below the 30 foot depth, the vertical extent has not been determined, a secondary plan of VOC removal may be undertaken. This alternative plan shall be approved by the agencies prior to implementation.

After the excavation of the trench, 3 vapor probes will be driven into selected areas of the excavation to verify that the extent of the volatile organics has been determined. The locations of the probes will be dependent on the results of the organic vapor concentrations found during excavation and after consultation with the EPA and DHS.

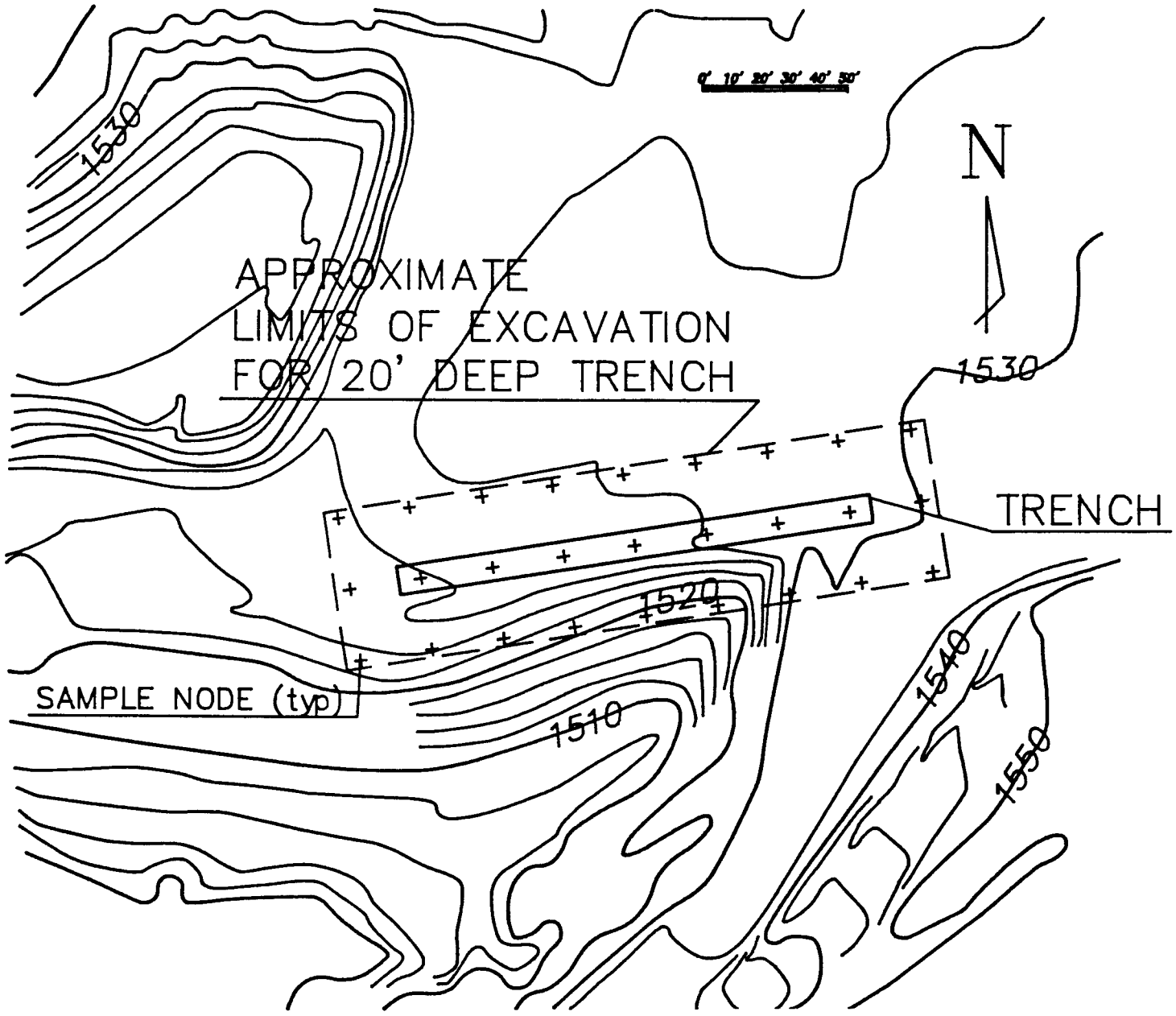
4. QUALITY CONTROL

All work shall be done in accordance with QA/QC plans and specifications that are detailed in the Revised RCRA Closure Plan for Bermite Division of Whittaker Corporation. Proper safety procedures will be followed to assure that personal safety is assured.

Probes needed outside excavation (4-5 minimum) should install them at same time as excav.

Probes' locations should be independent of results of trenching

≥5 probes south of trench minimum (investigate previous data) [BH11, 2, 14]



BERMITE DIVISION, WHITTAKER CORPORATION	Consulting Engineers	OCT 87
317 Area Soil Removal - Limits of Excavation	Wenck Associates, Inc. Twelve Oaks Center 15500 Wayzata Blvd. Wayzata, MN 55391	Fig. 1

Wenck Associates, Inc.

Consulting Engineers
(612) 475-0858

CAD 064·573·108

June 5, 1987

Mr. Alan Sorsher
Department of Health Services
Toxic Substances Control Division
107 S. Broadway, Room 7128
Los Angeles, California 90012

Re: Bermite Division, Whittaker Corporation, Saugus, California
317 and 342 Investigation Plan

Dear Mr. Sorsher:

The Revised Closure Plan and Work Plan for the 317, 342 area were transmitted to you on May 4, 1987. During several conversations with you we have indicated that we wish to proceed with the field investigations as soon as possible.

As we discussed on June 5, 1987, we are presently scheduled to initiate the field investigations on June 22, 1987. We will be beginning with the soil characterization of the 317 area. You are invited to be present during the field work, which is anticipated to last approximately three weeks.

If you have any questions or comments concerning the proposed investigation on the field or analytical methods, please contact us as soon as possible so that these changes can be incorporated into the plan. Since we do not know what we will be encountering during the investigation, it does not seem prudent at this time to spend additional efforts redefining the plan without knowing the conditions in the field. Furthermore, from the input that was received during the meeting in San Francisco at our April 14 meeting, it was apparent then that you were in substantial agreement with the plan as presented.

832 Twelve Oaks Center
15500 Wayzata Blvd.
Wayzata, MN 55391

Wenck Associates, Inc.

Consulting Engineers
(612) 475-0858

We invite your comments and your participation in this investigation program. If you have any questions or comments please call me or Chris Thompson at my office.

Respectfully submitted,

WENCK ASSOCIATES, INC.

Norman C. Wenck, P.E.
President

NCW/msw

cc: Lily Wong, EPA
Jim Levy, EPA ✓
Larry Peterson, RWQCB
Frank Kresse
Bob Bean
Kyle Emerson

832 Twelve Oaks Center
15500 Wayzata Blvd.
Wayzata, MN 55391

Wenck Associates, Inc.

Consulting Engineers
(612) 475-0858

June 5, 1987

Mr. Alan Sorsher
Department of Health Services
Toxic Substances Control Division
107 S. Broadway, Room 7128
Los Angeles, California 90012

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Wayzata, MN 55391

Wenck Associates, Inc.

Consulting Engineers
(612) 475-0858

We invite your comments and your participation in this investigation program. If you have any questions or comments please call me or Chris Thompson at my office.

Respectfully submitted,

WENCK ASSOCIATES, INC.

Norman C. Wenck, P.E.
President

NCW/msw

cc: Lily Wong, EPA ✓
Jim Levy, EPA
Larry Peterson, RWQCB
Frank Kresse
Bob Bean
Kyle Emerson

832 Twelve Oaks Center
15500 Wayzata Blvd.
Wayzata, MN 55391

INSURANCE FROM CNA

CNA Plaza/Chicago, Illinois 60685

- ☐ Continental Casualty Company
- ☐ Transportation Insurance Company
- ☐ American Casualty Company of Reading, Pa.
- ☐ National Fire Insurance Company of Hartford
- ☒ Transcontinental Insurance Company
- ☐ Valley Forge Insurance Company

NOTICE OF CANCELLATION, NON-RENEWAL, OR REDUCTION IN COVERAGE

TO:
ENVIRONMENTAL PROTECTION AGENCY
215 FREMONT STREET
SAN FRANCISCO, CALIFORNIA 94105

AS RESPECTS TO: WHITTAKER CORPORATION - Bonnie Dr. Sayre

POLICY NUMBER: UMB 008450012
EPA# CAD 064573108

DATE OF MAILING: 5-8-85

This is to notify you that the above numbered insurance policy: (Applicable item marked ☒)

☒ is cancelled effective 11-1-85, at the same time of day the policy became effective. This notice is based on the following grounds: COMPANY ELECTION.

☐ is cancelled effective _____, at the same time of day the policy became effective.

☐ will not be renewed or continued in force at its expiration date.

☐ will not be renewed or continued in force at its expiration for the following reason:

☐ will be amended, on renewal, or on the next anniversary date, to provide reduced coverage or limits of liability as follows:

NAME AND ADDRESS OF PRODUCER

STEWART SMITH WEST, INC.
3200 WILSHIRE BLVD.
LOS ANGELES, CALIFORNIA 90010

Unearned premium (if any) will be refunded as soon as practicable. If the premium has not been paid, a bill for the premium earned to the time of termination will be forwarded in due course.

PLEASE NOTE: If your insurance agent or broker is unable to renew your property coverage in the normal market, you may be eligible for certain basic coverage through a property FAIR Plan, if such Plan is available. Your insurance agent or broker can assist you or you may contact:

_____

(NAME, ADDRESS & TELEPHONE NO. OF FAIR PLAN FACILITY, IF ANY)

To Mortgagee Or Loss Payee:

You are hereby notified that the agreement under the mortgage clause or loss payable clause, which is a part of the above policy, issued to the above insured, is hereby cancelled (or terminated) in accordance with the conditions of the policy, said cancellation (or termination) to be effective on and after the hour and date mentioned above.

NAME AND ADDRESS OF LOSS PAYEES

By Donna Bradshaw
AUTHORIZED AGENT

DONNA BRADSHAW

G-31239-H

HAZARDOUS WASTE FACILITY LIABILITY ENDORSEMENT

1. This endorsement certifies that the policy to which the endorsement is attached provides liability insurance covering bodily injury and property damage in connection with the insured's obligation to demonstrate financial responsibility under Chapter 3745-55-47 of the Administrative Code. The coverage applies at

EPA Identification Number: CAD 04 43 13 99 9

NAME: Whittaker Corporation, Colton Coating and Chemicals

ADDRESS: 1231 South Lincoln Street, Colton, California 92324

FOR (sudden) and (accidental) occurrences

The limits of liability are $1,000,000 each occurrence

and $2,000,000 annual aggregate;

inclusive of legal defense costs.

2. The insurance afforded with respect to such occurrences is subject to all of the terms and conditions of the policy; provided, however, that any provisions of the policy inconsistent with subsections (a) through (e) of this Paragraph 2 are hereby amended to conform with subsections (a) through (e):

(a) Bankruptcy or insolvency of the Insured shall not relieve the Insurer of its obligations under the policy to which this endorsement is attached.

(b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the Insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in Paragraph (F) of Rule 3745-55-47 of the Administrative Code.

(c) Whenever requested by the Director, the company agrees to furnish to the Director a signed duplicate original of the policy and all endorsements.

(d) Cancellation of this endorsement, whether by the Insurer or the Insured, will be effective only upon written notice and only after the expiration of sixty days after a copy of such written notice is received by the Director at:

ENVIRONMENTAL PROTECTION AGENCY
215 FREMONT STREET
SAN FRANCISCO, CALIFORNIA 94105

(e) Any other termination of this endorsement shall be effective only upon written notice and only after the expiration of thirty days after a copy of such written notice is received by the Director.

Attaching to and forming part of policy no. CFG GO 511359-3 Issued by INA INSURANCE CO. herein called the Insurer, of 24 GREENWOOD PLAZA, HOUSTON TEXAS 77027 to WHITTAKER CORP. of 10880 WILSHIRE BLVD., LOS ANGELES, CA 90024 this 10 day of DECEMBER 1985. The effective date of said policy is the 1st day of NOVEMBER 1985 and expires 1st day of NOVEMBER 1986.

I hereby certify that the wording of this endorsement is identical to the wording specified in Paragrah (I) of Rule 3745-55-51 of the Administrative Code as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more states.

Signature of Authorized Representative of Insurer [signature]

Name of Individual Signing Dave Hirshorn - Account Manager

Title, Authorized Representative of (Name of Insurer) INA

Address of Representative P.O. Box 27706, Houston, TX 77027

INSURANCE FROM CNA

CNA Plaza/Chicago, Illinois 60685

☐ Cont tal Casualty Company
☐ Transportation Insurance Company
☐ American Casualty Company of Reading, Pa.
☐ I onal Fire Insurance Company of Hartford
☒ Transcontinental Insurance Company
☐ Valley Forge Insurance Company

NOTICE OF CANCELLATION, NON-RENEWAL, OR REDUCTION IN COVERAGE

TO:

ENVIRONMENTAL PROTECTION AGENCY
215 FREMONT STREET
SAN FRANCISCO, CALIFORNIA 94105

POLICY NUMBER: UMB 31 008450012
EPA# CAD 04 43 13 99 9
CAD 07 19 11 05 1
CAD 08 30 24 14 1
DATE OF MAILING: 5-8-85

AS RESPECTS TO: WHITTAKER CORPORATION

This is to notify you that the above numbered insurance policy: (Applicable item marked ☒)

☒ is cancelled effective 11-1-85, at the same time of day the policy became effective. This notice is based on the following grounds: COMPANY ELECTION.

☐ is cancelled effective _____, at the same time of day the policy became effective.

☐ will not be renewed or continued in force at its expiration date.

☐ will not be renewed or continued in force at its expiration for the following reason:

☐ will be amended, on renewal, or on the next anniversary date, to provide reduced coverage or limits of liability as follows:

NAME AND ADDRESS OF PRODUCER

STEWART SMITH WEST, INC.
3200 WILSHIRE BLVD.
LOS ANGELES, CALIFORNIA 90010

Unearned premium (if any) will be refunded as soon as practicable. If the premium has not been paid, a bill for the premium earned to the time of termination will be forwarded in due course.

PLEASE NOTE: If your insurance agent or broker is unable to renew your property coverage in the normal market, you may be eligible for certain basic coverage through a property FAIR Plan, if such Plan is available. Your insurance agent or broker can assist you or you may contact:

_____

(NAME, ADDRESS & TELEPHONE NO. OF FAIR PLAN FACILITY, IF ANY)

To Mortgagee Or Loss Payee:

You are hereby notified that the agreement under the mortgage clause or loss payable clause, which is a part of the above policy, issued to the above insured, is hereby cancelled (or terminated) in accordance with the conditions of the policy, said cancellation (or termination) to be effective on and after the hour and date mentioned above.

NAME AND ADDRESS OF LOSS PAYEES

By Donna Bradshaw
AUTHORIZED AGENT

DONNA BRADSHAW

G-31239-H

CAD064 573 108
2F

RCRA FINANCIAL ASSURANCE CHECKLIST FOR FINANCIAL TEST/CORPORATE GUARANTEE

Parent Company Name: Whittaker Corporation

Parent Company Address: 10880 Wilshire Blvd., Los Angeles, CA 90024-4163

Facility Name: Bermite Division, Whittaker Corporation *

Facility Address: 22116 W. Soledad Canyon Rd., Santa Clarita, CA 91350

County in which Facility is Located: N/A

EPA I.D. Number: CAD-064-573-108

Facility Contact Person/Title: Gordon J. Louttit / V.P. - Asst. General Counsel

Facility Contact Phone Number: (213) 475-9411

Year For Which Audit is Conducted: 1991

Type of Instrument Employed: Financial Test ☒ Corporate Guarantee ☐

Instrument Covers: Closure ☐ Post-closure ☒

Sudden Liability ☒ Nonsudden Liability ☐

Land Disposal Facility: Yes ☐ No ☐

Amount of Closure (Facility Submittal): Not provided

Source Document:

Date:

Amount of Closure (Agency Approved): $410,000 (1990)

Source Document: Summary Review Sheet

Date: 12/27/90

Amount of Post-closure (Facility Submittal): $500,000

Source Document: Financial Test

Date: 02/21/91

Amount of Post-closure (Agency Approved): $500,000 (1990)

Source Document: Summary Review Sheet

Date: 12/27/90

Fiscal Year Ends 10/31

* for RCRIS as "Bermite Division"

RCRA FINANCIAL ASSURANCE CHECKLIST
FOR FINANCIAL TEST/CORPORATE GUARANTEE

YES	NO	
☐	☒	If the financial test/corporate guarantee is submitted to satisfy requirements for "liability self-insurance" as specified in 40 CFR §264.147(f) and (g) and 40 CFR §265.147(f) and (g), does the submittal satisfactorily demonstrate compliance? ☐ Not Applicable
☐	☐	If a Corporate Guarantee is employed, does the "parent corporation" own at least 50% of the subsidiary company's assets? (40 CFR §264.141(d)/40 CFR §265.120(d)) ☒ Not Applicable
☐	☐	If a Corporate Guarantee has been submitted on behalf of a corporation incorporated in the United States to satisfy requirements for "liability self-insurance," has a written statement(s) been submitted as specified in 40 CFR §264.147(g)(2) and 40 CFR §265.147(g)(2)? If yes, indicate the appropriate sources of the statement(s). ☐ Attorney(s) General ☐ Insurance Commissioner(s) ☒ Not Applicable
☐	☐	If a Corporate Guarantee has been submitted on behalf of a corporation incorporated outside of the United States to satisfy requirements for "liability self-insurance," has the non-United States corporation identified a "registered agent(s)" as specified in 40 CFR §264.147(g)(2)(ii) and 40 CFR §265.147(g)(2)(ii)? ☒ Not Applicable
☐	☐	If a Corporate Guarantee has been submitted on behalf of a corporation incorporated outside of the United States to satisfy requirements for "liability self-insurance," have the appropriate written statements been submitted as specified in 40 CFR §264.147(g)(2)(ii) and 40 CFR §265.147(g)(2)(ii)? If yes, indicate the appropriate sources(s) of the statement(s) ☐ Attorney(s) General ☐ Insurance Commissioner(s) ☒ Not Applicable

RCRA FINANCIAL ASSURANCE CHECKLIST
FOR FINANCIAL TEST/CORPORATE GUARANTEE

☒ **FINANCIAL TEST/CORPORATE GUARANTEE ALTERNATIVE 1:** (As specified in 40 CFR §264.143(f)(1)(i)/40 CFR §264.145(f)(1)(i) and 40 CFR §265.143(e)(1)(i)/40 CFR §265.145(e)(1)(i))

☒ The test meets at least two of the three following ratios required.

☐ The test fails to meet at least two of the three following ratios required.

(Indicate actual calculation results in the blank spaces provided.)

_ $\frac{\text{total liabilities}}{\text{net worth}} < 2.0$ 5.071

X $\frac{\text{(net income and depreciation and depletion and amortization)}}{\text{total liabilities}} > 0.1$ 0.522

X $\frac{\text{current assets}}{\text{current liabilities}} > 1.5$ 2.061

☐ The net working capital and tangible net worth are each at least six times the sum of the current closure and post-closure cost estimates and the current plugging and abandonment cost estimates.

☒ The tangible net worth of the company is at least $10 million.

☒ The U.S. assets of the company are equal to at least 90% of total assets or six times the sum of the current closure and post-closure cost estimates and the current plugging and abandonment cost estimates.

☐ **FINANCIAL TEST/CORPORATE GUARANTEE ALTERNATIVE 2:** (As specified in 40 CFR §264.143(f)(1)(ii)/40 CFR §264.145(f)(1)(ii) and 40 CFR §265.143(e)(1)(ii)/40 CFR §265.145(e)(1)(ii))

☐ The current bond rating is adequate:

(Indicate appropriate bond rating(s) and source(s))

Standard and Poor's	Moody's
☐ AAA	☐ Aaa
☐ AA	☐ Aa
☐ A	☐ A
☐ BBB	☐ Baa

RCRA FINANCIAL ASSURANCE CHECKLIST
FOR FINANCIAL TEST/CORPORATE GUARANTEE

☐ The tangible net worth of the company is at least six times the sum of the current closure and post-closure cost estimates and the current plugging and abandonment cost estimates.

☐ The tangible net worth of the company is at least $10 million.

☐ The U.S. assets of the company are equal to at least 90% of the total assets or six times the sum of the current closure and post-closure cost estimates and the current plugging and abandonment cost estimates.

YES	NO	
☐	☒	Has a letter, properly executed and signed by the owner's or operator's chief financial officer and worded as specified in 40 CFR §264.151(f) or 40 CFR §264.151(g), been submitted? (40 CFR §264.143(f)(3)(i)/40 CFR §264.145(f)(3)(i) - 40 CFR §265.143(e)(3)(i)/40 CFR §265.145(e)(3)(i) - 40 CFR §264.147(f)(3)(i)/ 40 CFR §265.147(f)(3)(i))
☒	☐	Has a copy of the independent certified public accountant's report on examination of the owner's or operator's financial statements for the latest completed fiscal year been submitted? (40 CFR §264.143(f)(3)(ii)/40 CFR §264.145(f)(3)(ii) - 40 CFR §265.143(e)(3)(ii)/40 CFR §265.145(e)(3)(ii))
☐	☐	If a corporate guarantee is employed, does it contain wording identical to the wording specified in 40 CFR § 264.151(h)? (40 CFR §264.143(f)(10)/40 CFR §264.145(f)(11) - 40 CFR §265.143(e)(10)/40 CFR §265.145(e)(11))
		☒ Corporate Guarantee is not employed.
☒	☐	Has a special report from the owner's or operator's independent certified public accountant been submitted as specified in 40 CFR §264.143(f)(3)(iii)/40 CFR §264.145(f)(3)(iii) and 40 CFR §265.143(e)(3)(iii)/40 CFR §265.145(e)(3)(iii)?
		☒ Financial statements corroborated
		☐ Disclaimers of opinion, adverse opinions
☐	☒	Is the facility in compliance with all financial test requirements set forth in 40 CFR §264.143(f)/40 CFR §264.145(f) and 40 CFR §265.143(e)/40 CFR §265.145(e)?

COMMENTS: Wording and format of submittal are not identical to exemplar for financial test for closure, post-closure, and liability. Two alternative I tests are submitted - Neither are in the proper format. Only one test should be used.

RCRA FINANCIAL ASSURANCE CHECKLIST
FOR FINANCIAL TEST/CORPORATE GUARANTEE

COMMENTS (con't): Although final closure has not yet been approved for this facility, no closure assurance has been submitted. The facility did not adjust their post-closure cost estimate for inflation - The facility's tangible net worth does not equal an amount at least six times the sum of closure/post-closure costs and the amount of liability coverage to be demonstrated.

Reviewed by: Ed Clark

Date: 11/21/91

FY 88 COMPLIANCE MONITORING AND ENFORCEMENT LOG
FINANCIAL RESPONSIBILITY RECORD REVIEWS (TYPE 3)

1. EPA ID: CAD-064-573-108

2. FACILITY TYPE:
/X/ Major TSD
/ / Non-Major TSD

3. FACILITY NAME: Bermite Division, Wh. Maker Corporation

STREET ADDRESS: 22116 W. Soledad Canyon Rd., Santa Clarita, CA 91350

5. CA DOHS REGION:
/ / NCS
/ / NCCS
/ / SCS

4. REVIEWER'S NAME: Edward M. Clark

6. DATE OF EVALUATION: 11/21/91

7. RESPONSIBLE AGENCY: S = CA DOHS

8. TYPE OF EVALUATION COVERED BY THIS REPORT: 3 = RECORD REVIEW

9. VIOLATIONS:

CLASS I FIN. [X]

CLASS II FIN. [X]

Enter appropriate determination:
'X' if violation is determined
'0' if no violations are found
'Z' if violation determination is pending
'S' if previously reported violation(s) are found
'I' if closed/closing facility is not in compliance with liability requirements but is in compliance with all other RCRA requirements

VIOLATION TYPE
circle one:
FRC - closure financial assurance violation only
FRP - post-closure financial assurance violation only
FRS - sudden liability coverage violation only
FRN - non-sudden liability coverage violation only
FRB - both closure & post-closure FA violations
FRL - both sudden & non-sudden violations
FRA - violations for all FA req'ts
major-closure & post-closure FA, sudden & non-sudden
non-major-closure FA & sudden
FRO - other combination of financial violations

ENFORCEMENT ACTIONS:

CLASS	ACTION TYPE (USE CODE)	DATE ACTION TAKEN	COMPLIANCE DATES		PENALTY		RESP. AGCY.
			SCHEDULED	ACTUAL	ASSESSED	COLLECTED	
I							STATE
II							STATE

Codes: Additional Enforcement Actions are listed on the Turnaround Document

10 = Informal Action
03 = Notice of Violation
04 = Initial Admin. Order
05 = Final Admin. Order
11 = Filed Civil Action
12 = Filed Criminal Action
18 = Referral of Civil Action to AG/DA

11. FINANCIAL MECHANISM(S) REVIEWED: CLOSURE Financial Test POST-CLOSURE Financial Test
SUDDEN " " NON-SUDDEN " "

RCRIS COMPLIANCE FORM - Par.
(ENFORCEMENT DISPOSITION DOCUMENT - EDD)

EVALUATIONS/INSPECTIONS

	Initial	Date
I/CO		3/6/92
Section Chief		3/16/92
TMS entry		
RCRIS entry		
HWDMS entry		
I/CO		

HANDLER DATA:

EPA ID # CAD064573108

CA Region 3

X LDF __ TSF __ GEN __ OTH

For TMS Use

HANDLER NAME/ADDRESS

Bermite Division, Whittaker Corp
22116 W. Soledad Canyon Road
Santa Clara, CA 91350

EVALUATION DATA:

EVALUATION DATE: 11/21/91 (M M D D Y Y)

EVALUATION CONTROL # (M M D D Y Y) (Seq #)

X	Add
	Change
	Delete

AGENCY C (E=EPA X=STATE OVERSIGHT C=EPA CONTRACTOR)

RESPONSIBLE PERSON PRC (LAST NAME)

SECTION (MAIL CODE)

TYPE OF EVALUATION (Check one)

CEI ____ Compliance Evaluation Inspection
CME ____ Comprehensive Monitoring Evaluation
SPL ____ Sampling Inspection
FRR X Financial Records Review
NRR ____ Non-Financial Records Review
LBN ____ Land Ban
CAO ____ Corrective Action Inspection
OAM ____ Operation & Maintenance Inspection
CDI ____ Case Development Inspection
CSE ____ Compliance Schedule Evaluation
OTH ____ Other(Note reason Below)

REASON FOR EVALUATION (Optional Circle one)

01	Follow up	02	Case Development	03	Sampling
04	Citizen Complaint	05	Withdrawal/Handler Status Change	06	Closure

COMMENTS: _____

COVERAGE AREAS (Check codes for all areas evaluated)

	Add
	Change
	Delete

Generator

GER ____ All Requirements
GGR ____ General(A)
GLB ____ Land Ban(268)
GMR ____ Manifest(B)
GOR ____ Other(265)
GPT ____ Pre-Transport(C)
GRR ____ Record Keeping(D)
GSC ____ Special Conditions
GSQ ____ Small Quantity Gen.

Transporter

TGR ____ General
TMR ____ Manifest
TOR ____ Other
TRR ____ All Requirements
TWD ____ Discharge/Spill

TSD Requirements

DCH ____ Chem/Phys/Biol(Q)
DCL ____ Close/Post Clos(G)
DCP ____ Contingency(D)
DFR X Financial (H)
DGS ____ General(B)
DGW ____ Groundwater(F)
DIN ____ Incinerator(O)
DPP ____ Prepare/Prevent(C)
DSI ____ Surface Impound(K)
DLT ____ Land Treatment(M)
DMC ____ Containers(I)
DMR ____ Manifest(E)
DOR ____ Other
DPB ____ Part B Appl.(270)
DLB ____ Land Ban(268)
DLF ____ Landfill(N)
DTR ____ Tank(J)
DTT ____ Thermal Treat(P)
DWP ____ Waste Pile(L)

Other

CAS ____ Corrective Action Schedule
FEA ____ Formal Enforcement Action

EPA Form 7/18/91

MAR 18 1992

RCRIS EVALUATION FORM INSTRUCTIONS -The following instructions are a quick reference for filling out a RCRIS Evaluation Form - Part 1. Each of the data elements on the form is explained below. The compliance form and instructions are organized into three sections: handler, evaluation, coverage area.

HANDLER DATA SECTION

EPA ID - Fill in the 12 character facility specific ID number.

Date Submitted - Fill in the date you submit the form for entry into RCRIS.

Handler Name - Print the name and address(location) of the handler exactly as it appears in RCRIS.

California Region - Enter the correct California regional office code.
1 - Sacramento 2 - Berkeley 3 - Burbank 4 - Long Beach 5 - Fresno

Facility Type - Check whether a facility is an LDF, TSF, GEN or OTHER. Check all that apply. (Note: This field is for use with TMS only. It may not reflect the RCRIS universe status.)

EVALUATION DATA SECTION

Action - Check add if you are reporting a new evaluation. Check change if you are modifying information about an evaluation which is currently in RCRIS. Check delete if you want to remove an evaluation. **For changes and deletions, the evaluation number must be referenced by consulting the "Evaluation Control Numbers Report".**

Evaluation Date - Enter the date the on-site inspection or the off-site record review was completed. (The last day of the evaluation.) The format is MM/DD/YY.

Evaluation Control Number - This field must be filled in if you are making a change to or deleting an evaluation which is already entered into RCRIS. This is a six or nine digit number comprising of the evaluation date and a possible sequence number. Leave blank for new entries, except when the same agency does two evaluations at the same facility on the same day. In this case, number the evaluations with sequence numbers '001' and '002'.

Responsible Agency Code - Choose : E = EPA X = State Oversight C = EPA Contractor

Evaluation Responsible Person - Enter last name of the inspector.

Section - Enter the inspectors mail code (example: H-4-1) Note: This is a 2 character field in RCRIS so only "41" will print out on RCRIS reports.

Type of Evaluation - Enter a valid evaluation type.

Reason for Evaluation - If the state or EPA conducts an evaluation for a non- routine reason, they may choose to enter a code describing that reason. **A blank in this position implies a routine evaluation.**

Evaluation Comment - Enter any evaluation related comment up to 74 characters. Do not write anything considered enforcement confidential. This will not print out on standard reports.

Coverage Area of the Evaluation - These are the areas evaluated. For a standard inspection type such as CEI, they should include all areas on the checklist for the type of handler being evaluated.

ROUTING

1. Make copy for case file kept by Inspector/Compliance Officer.
2. Send Original to Section Chief, then TMS data entry person, then to Bess Gordon-Morgan(H-3-4) for RCRIS data entry.
3. When form is returned with all initials from routing, replace file copy with the original.

RCRIS COMPLIANCE FORM - Par.
(ENFORCEMENT DISPOSITION DOCUMENT - EDD)

VIOLATIONS

	Initial	Date
I/CO	[illegible]	3/6/92
Section Chief	[illegible]	3/16/92
~~TMS entry~~		
RCRIS entry		
HWDMS entry		
I/CO		

[X] Add
[ ] Change
[ ] Delete

HANDLER DATA:

EPA ID # CAD064573108

HANDLER NAME/ADDRESS
Bermite Division, Whittaker Corp
22116 W. Soledad Canyon Road
Santa Clara CA 91350

EVALUATION DATA:

(All violations indicated below will be linked to this evaluation)

EVALUATION DATE: 11/21/91 (M M D D Y Y) | C AGENCY | FRR TYPE | EVALUATION CONTROL # (M M D D Y Y) (Seq #)

VIOLATION DATA

VIOLATION AREAS (Do not check these. Enter into Violation Type below)

Generator

GGR — General(A)
GLB — Land Ban(268)
GMR — Manifest(B)
GOR — Other(265)
GPT — Pre-Transport(C)
GRR — Record Keeping(D)
GSC — Special Conditions
GSQ — Small Quantity Gen.

TSD Requirements

DCH — Chem/Phys/Biol(Q)
DCL — Close/Post Clos(G)
DCP — Contingency(D)
DFR — Financial (H)
DGS — General(B)
DGW — Groundwater(F)
DIN — Incinerator(O)
DPP — Prepare/Prevent(C)
DSI — Surface Impound(K)
DLT — Land Treatment(M)
DMC — Containers(I)
DMR — Manifest(E)
DOR — Other
DPB — Part B Appl.(270)
DLB — Land Ban(268)
DLF — Landfill(N)
DTR — Tank(J)
DTT — Thermal Treat(P)
DWP — Waste Pile(L)

Transporter

TGR — General
TMR — Manifest
TOR — Other
TWD — Discharge/SpiL

Other

CAS — Corrective Action Schedule
FEA — Formal Enforcement Action

A/C/D	CONTROL NO.	VIOL. TYPE	CLASS	PRIORITY	DATE DETER.*	ACTUAL COMP. DATE*
~~A~~		~~DFR~~	~~1 2 P~~		/ /	/ /
~~C~~	~~0001~~	~~DFR~~	~~1 2 P~~		~~11/21/91~~	/ /
~~C~~	~~0001~~	~~DFR~~	~~1 2 P~~		~~11/21/91~~	/ /
A		DFR	1 2 P		11/21/91	/ /
			1 2 P		/ /	/ /
			1 2 P		/ /	/ /
			1 2 P		/ /	/ /

AGENCY [ ] (E=EPA)

RESPONSIBLE SECTION H-H-1

PERSON SCHIMMEL
LAST NAME

*Attach documentation of violation classification or compliance.

EPA Form 7/18/91

MAR 18 1992

SAIC

CONTACT REPORT

Project Number: 2-817-08-036-00

Prepared by: Jill Kiernan Date: 10/6/87

☒ Made Call to:
☐ Received Call from:
☐ Meeting Held with:
Date: 10/6/87

Contact: Alan Sorsher
Affiliation: California Dept. of Health Services - LA
Phone #: (213) 620-6008

Discussion: Re: Citizens Complaints Followup for Whittaker / Bermite Facility

I called Alan to find out more information about a DOHS public hearing which was held in August 1987, for the closure of the Whittaker / Bermite facility near Saugus, California. Several citizens had raised concerns over past waste management practices at this site. Some of the concerns brought up by citizens at the meeting included: ① a load of bricks that was supposed to be landfilled offsite, but was buried onsite, ② a tractor buried onsite, and ③ an underground tunnel used for explosives testing. Alan gave me the names of two of these citizens present at the hearing to contact for additional information. These contacts are:

① Gary Thornhill - 805-252-2067 (H) or 818-365-1600 (W)
He lives near the Whittaker / Bermite site and also works as a photographer for a local newspaper. He has taken photos of the site, which may be of interest to us.

② Morris Deason 805-296-4888 (H)
He is a former AQMD employee who used to inspect the facility. He also knows a former employee of Bermite, Jackie Dick.

Distribution:

Seattle Office
Environmental Technology Group
13400-B Northup Way, Suite 38
Bellevue, Washington 98005
(206) 747-7899

SAIC	CONTACT REPORT	Project Number: 2-817-08-036-00

Prepared by: Jill Kiernan Date: 10/6/87

☒ Made Call to:
☐ Received Call from:
☐ Meeting Held with:

Date: 10/6/87

Contact: Morris Deason (Los Angeles)

Affiliation:

Phone #: (805) 296-4888

Discussion: Re: Citizens Complaints Followup for Whittaker/Bermite Facility

I called at 10:50 am. Mr. Deason was out of town until Wednesday. I left a message with Mrs. Deason for him to call me back.

Distribution:

Seattle Office
Environmental Technology Group
13400-B Northup Way, Suite 38
Bellevue, Washington 98005
(206) 747-7899

SAIC

CONTACT REPORT

Project Number: 2-817-08-036-00

Prepared by: Jill Kiernan

Date: 10/8/87

☐ Made Call to:
☒ Received Call from:
☐ Meeting Held with:

Date: 10/8/87

Contact: Morris Deason

Affiliation:

Phone #: (805) 296-4888

Discussion: Re: Citizens Complaints Followup for Whittaker / Bermite Facility

Mr Deason was a former inspector with the Air Quality Management District (AQMD). He has been working as an environmental consultant since he left the AQMD in 1983. As an AQMD inspector, he cited the Bermite facility for an uncontrolled flare tower which was used to burn explosives containing magnesium. The facility later installed a baghouse to control emissions from this flare tower. The AQMD also regulated an open burning area on the site. Mr. Deason indicated that the facility has always been reluctant to provide information on operations and waste management practices to regulatory agencies.

Mr. Deason could not provide any information on specific waste management sites but indicated that the facility practiced onsite land disposal of wastes during the 1920's and 1930's. He expressed concern over this past waste burial practice since the site has been sold for development and problems could arise from grading activities.

Mr Deason gave me the name of a woman who works for a local land development committee and may be able to provide additional information about the Whittaker / Bermite facility. Her name is Loreen West at 805-254-3823.

Distribution:

Seattle Office
Environmental Technology Group
13400-B Northup Way, Suite 38
Bellevue, Washington 98005
(206) 747-7899

State of California
Department of Health

APPLICATION FOR
OPERATING PERMIT FOR FACILITIES RECEIVING HAZARDOUS WASTE
(Document 1)

Application for: (1)	Facility Permit Number (2)	County Assessor's Parcel Number(s) (3)
1. [X] Operating Permit 2. [ ] Modification of Permit [ ] Change in Design [ ] Change in Operation [ ] Change in Ownership/ Operator	800 Date Received Date Permit Issued	Geographical Location of Facility (4) Section 31 Range 5E Township ____ Principal Meridian ____

Name and Street Address of Facility (5)	OPERATOR (6)
Bermite Division, Whittaker Corp. 22116 W. Soledad Canyon Road Saugus, CA 91350 Telephone (805) 259-2241	Name and Address of Business Operating Facility Bermite Division, Whittaker Corp. 22116 W. Soledad Canyon Road Saugus, CA 91350 Telephone (805) 259-2241
Name and Mailing Address of Legal Owner of Facility (7) Whittaker Corporation 10880 Wilshire Boulevard Los Angeles, CA 90024 Telephone (213) 475-9411	Type of Business Operating Facility [ ] Sole Proprietorship [X] Corporation [ ] Partnership [ ] Government Agency Name and Address of Owner(s) of Business Operating Facility (Must be address where legal notice may be served.) Whittaker Corporation 10880 Wilshire Boulevard Los Angeles, CA 90024 Telephone (213) 475-9411
Type of Facility (Check all appropriate boxes) (8) [ ] Landfill [ ] Storage [ ] Pond [ ] Composting [ ] Resource Recovery [ ] Injection Well [ ] Transfer Station [ ] Other Detonation & Burning (specify)	Type of Wastes Received (Check all appropriate boxes and/or consult Sec. 60261 & 60283, Title 22, Calif. Adm. Code for additional names of hazardous wastes.) (9) [ ] Acid solution [ ] Solvent [ ] Oil [ ] Alkaline solution [ ] Tetraethyl lead sludge [ ] Drilling mud [ ] Pesticides [ ] Chemical toilet wastes [ ] Contaminated soil and sand [ ] Paint sludge [ ] Tank bottom sediment Other: Non-Liquid expolsives & pyrotechnic wastes
Does the public use the facility? [ ] Yes [X] No (10)	

(11) Attach a list of regulatory agencies having jurisdiction over the Facility. Include any permit numbers where appropriate.

(12) I hereby certify that the information provided in this application and in the attachments (listed below) is true and accurate to the best of my knowledge. Attachments:

Signature of Owner (13)	Signature of Operator (14)
Douglas B. Moore	Zoyd R. Luce
Printed or Typed Name: Douglas B. Moore	Printed or Typed Name: Zoyd R. Luce
Title: President Date: 01/25/82	Title: Director of Industrial Relations Date: 01/25/82

Signature of Reviewer (15)	Signature of Reviewer (16)
County Health Department	CALIFORNIA STATE DEPARTMENT OF HEALTH
Printed or Typed Name	Printed or Typed Name
Title Date	Title Date

State of California
Department of Health

APPLICATION FOR
OPERATING PERMIT FOR FACILITIES RECEIVING HAZARDOUS WASTE
(Document 1)

Application for: (1) 1. ☒ Operating Permit 2. ☐ Modification of Permit ☐ Change in Design ☐ Change in Operation ☐ Change in Ownership/ Operator	Facility Permit Number (2) 800 Date Received Date Permit Issued	County Assessor's Parcel Number(s) (3) Geographical Location of Facility (4) Section 31 Range 5E Township ____ Principal Meridian ____

Name and Street Address of Facility (5) Bermite Division, Whittaker Corp. 22116 W. Soledad Canyon Rd. Saugus, CA 91350 Telephone (805) 259-2241	OPERATOR (6) Name and Address of Business Operating Facility Bermite Division, Whittaker Corp. 22116 W. Soledad Canyon Rd. Saugus, CA 91350 Telephone (805) 259-2241
Name and Mailing Address of Legal Owner of Facility (7) Whittaker Corporation 10880 Wilshire Blvd. Los Angeles, CA 90024 Telephone (213) 475-9411	Type of Business Operating Facility ☐ Sole Proprietorship ☒ Corporation ☐ Partnership ☐ Government Agency Name and Address of Owner(s) of Business Operating Facility (Must be address where legal notice may be served.) Whittaker Corporation 10880 Wilshire Blvd. Los Angeles, CA 90024 Telephone ( )
Type of Facility (Check all appropriate boxes) (8) ☐ Landfill ☐ Storage ☐ Pond ☐ Composting ☐ Resource Recovery ☐ Injection Well ☐ Transfer Station ☐ Other ____ Detonation & Burning (specify)	Type of Wastes Received (Check all appropriate boxes and/or consult Sec. 60281 & 60283, Title 22, Calif. Adm. Code for additional names of hazardous wastes.) (9) ☐ Acid solution ☐ Solvent ☐ Oil ☐ Alkaline solution ☐ Tetraethyl lead sludge ☐ Drilling mud ☐ Pesticides ☐ Chemical toilet wastes ☐ Contaminated soil and sand ☐ Paint sludge ☐ Tank bottom sediment Other: Non-Liquid explosives & pyrotechnic wastes
Does the public use the facility? ☐ Yes ☒ No (10)	

Attach a list of regulatory agencies having jurisdiction over the Facility. Include any permit numbers where appropriate. (11)

I hereby certify that the information provided in this application and in the attachments (listed below) is true and accurate to the best of my knowledge. Attachments: (12)

Signature of Owner (13) Douglas B. Moore	Signature of Operator (14) Zoyd R. Luce
Printed or Typed Name Douglas B. Moore	Printed or Typed Name Zoyd R. Luce
Title President Date 2/24/81	Title Director of Industrial Relations Date 2/24/81

Signature of Reviewer (15)	Signature of Reviewer (16)
County Health Department	CALIFORNIA STATE DEPARTMENT OF HEALTH
Printed or Typed Name	Printed or Typed Name
Title Date	Title Date

EH 188 (12/77)