

From: Law.Christopher@DTSC
To: Kracov.Gideon@DTSC
Cc: Rohlfes.Larry@DTSC
Subject: Response to your request for corrective action financial assurance documentation
Date: Monday, July 11, 2016 5:53:42 PM
Attachments: [IRP_FA-CA Request revised 7 8.pdf](#)
[Kaiser.pdf](#)
[Phibrotech.pdf](#)
[International Light Metals.PDF](#)
Importance: High

Gideon,

Per your request, I have attached documentation of the financial assurance corrective action (FA CA) amounts for three of the four facilities identified your June 10, 2016 email.

In addition, as described below, our review of the financial assurance documents required us to revise financial assurance spreadsheet provided on June 7th. An updated version also attached.

- **Dow Chemical Pittsburg**
 - The Regional Water Control Board (Region 2) was designated lead oversight agency for this facility and has been responsible for corrective action oversight since 1997. Dow Chemical provided Region 2 and DTSC with a FA CA estimate of \$69,205,200 on April 4, 2016 and Region 2 concurred with the FA CA amount. A note has been added to the updated spreadsheet clarifying that Region 2 is the lead oversight agency for this facility. The financial assurance mechanism can be provided at your request.
- **International Light Metals**
 - The FA CA Amount has been updated on the spreadsheet from \$18,000,000 to \$18,609,049. Our review determined that the entire amount in the post-closure financial assurance should be designated as corrective action financial assurance. The amount will be updated during the next annual financial assurance review. The attached February 2016 letter from DTSC to the facility documents that DTSC reviewed and accepted the facility's final cost estimate.
- **Kaiser Ventures, Inc.**
 - The Post Closure (\$4,406,237) and the Corrective Action (\$3,802,255) amounts were transposed on the June 7th spreadsheet. This data has been corrected in the updated spreadsheet provided. That attached January 2015 letter from DTSC to the facility documents that DTSC conducted a financial responsibility review and validated the corrective action amount.
- **Phibro Tech (PTI)**
 - The attached November 2007 letter from DTSC to the facility documents DTSC's approval of the FA CA amount of \$5,627,760. Also attached is Phibro Tech's February 2013 evaluation of the financial assurance estimate to DTSC.

Please let me know if you have any additional questions.

Chris

Christopher Law
DTSC Independent Review Panel Liaison
916-322-0513

From: Kracov, Gideon@DTSC
Sent: Friday, June 10, 2016 1:33 PM
To: Law, Christopher@DTSC
Subject: RE: Chris - some follow up questions

yes

Gideon Kracov
Chair, DTSC Independent Review Panel
gideon.kracov@dtsc.ca.gov

*The DTSC Independent Review Panel is a part-time volunteer Panel. This e-mail account may not be checked daily.

From: Law, Christopher@DTSC
Sent: Friday, June 10, 2016 1:31 PM
To: Kracov, Gideon@DTSC
Cc: Rohlfes, Larry@DTSC
Subject: RE: Chris - some follow up questions

OK, making sure we are on the same page. You are asking about:

Dow Chemical – Pittsburg
Kaiser Ventures, Inc
Former International Light Metal
Phibro Tech

From: Kracov, Gideon@DTSC
Sent: Friday, June 10, 2016 1:20 PM
To: Law, Christopher@DTSC
Cc: Rohlfes, Larry@DTSC
Subject: RE: Chris - some follow up questions

thanks for responding. I meant 69 not 67. Thanks!

Gideon Kracov
Chair, DTSC Independent Review Panel
gideon.kracov@dtsc.ca.gov

*The DTSC Independent Review Panel is a part-time volunteer Panel. This e-mail account may not be checked daily.

From: Law, Christopher@DTSC
Sent: Friday, June 10, 2016 12:46 PM
To: Kracov, Gideon@DTSC
Cc: Rohlfes, Larry@DTSC
Subject: RE: Chris - some follow up questions

Gideon,

I will check on this.

With respect to corrective action, #67 (Lawrence Livermore) is exempt by law since it's a DOD facility. Is that the facility you were referring to?

Chris

From: Kracov, Gideon@DTSC
Sent: Friday, June 10, 2016 12:13 PM
To: Law, Christopher@DTSC
Cc: Rohlfes, Larry@DTSC
Subject: Chris - some follow up questions
Importance: High

Chris:

Chris:

A few follow up questions with answers requested before the July meeting:

In this document, page 3, how many of the 11 civil/criminal referrals were actually accepted for prosecution?: <https://www.dtsc.ca.gov/GetInvolved/ReviewPanel/upload/DTSC-Report-on-OCI-and-EERD-Caselog-Data-for-CY-2014-2015-and-2016-to-1-1-16-May-5-2016.pdf> <https://www.dtsc.ca.gov/GetInvolved/ReviewPanel/upload/DTSC-Report-on-OCI-and-EERD-Caselog-Data-for-CY-2014-2015-and-2016-to-1-1-16-May-5-2016.pdf> <https://www.dtsc.ca.gov/GetInvolved/ReviewPanel/upload/DTSC-Report-on-OCI-and-EERD-Caselog-Data-for-CY-2014-2015-and-2016-to-1-1-16-May-5-2016.pdf> And if they were prosecuted please provide the actual complaint/lawsuit for each one.

In the financial assurances document provided Wednesday, can you please provide the actual document that shows the financial assurance FOR CORRECTIVE ACTION (not the assurance itself but the document(s) that shows the amount and that it is for corrective action) for nos. 39, 61, 67 and 79.

Thank you. If any of these requests are unclear, please follow up with me directly.

Thanks!

Gideon Kracov
Chair, DTSC Independent Review Panel
gideon.kracov@dtsc.ca.gov

*The DTSC Independent Review Panel is a part-time volunteer Panel. This e-mail account may not be checked daily.



Matthew Rodriguez
Secretary for
Environmental Protection



Department of Toxic Substances Control

Barbara A. Lee, Director
9211 Oakdale Avenue
Chatsworth, California 91311



Edmund G. Brown Jr.
Governor

February 25, 2016

Mr. Gene Matsushita
Lockheed Martin Corporation
2950 North Hollywood Way, Suite 125
Burbank, California 91505

ACCEPTANCE OF FINANCIAL COST ESTIMATE FOR SELECTED REMEDY,
INTERNATIONAL LIGHT METALS (ILM) FACILITY, TORRANCE, EPA NUMBER
CAD030398222

Dear Mr. Matsushita:

The Department of Toxic Substances Control (DTSC) has reviewed the Financial Cost Estimate (FCE) prepared by Tetra Tech for the Lockheed Martin Corporation (ILM). The FCE was prepared to estimate the total cost for the operations and maintenance of the selected remedy at the former International Light Metals site in Torrance.

Based on the review of the FCE and subsequent discussions, DTSC finds that the Facility's cost estimate is within 10% of DTSC Cost Estimating Work Group's estimate. The Facility's final cost estimate of \$18,609,049 is adequate for the operations and maintenance of the selected remedy over 30 years at the ILM site.

The Scope of Work for operations and maintenance activities at the site includes:

- Land Use Covenant (LUC) inspection and reporting
- Installation and operations and maintenance of soil vapor extraction systems with enhanced in-situ bioremediation at three areas of the facility
- Installation and operations and maintenance of dual phase extraction systems in two areas of the facility
- Long-Term Groundwater Monitoring
- Site Closure

Your facility is required to select one of the following financial assurance mechanisms below, and it will be approved by DTSC Financial Assurance Unit:

- Corporate Test
- Insurance
- Letter of Credit
- Surety Bond
- Trust Fund

Thank you for your effort in the corrective action process. If you have further questions regarding this matter, please contact me at (818) 717-6604.

Sincerely,



Vu T. Nguyen
Project Manager
Brownfields and Environmental Restoration Program
Department of Toxic Substances Control

cc: Ms. Denise Kato
Lockheed Martin Corporation
1111 Lockheed Martin Way, Bldg. 157 9K2S
Sunnyvale, CA 94089

Ms. Tizita Bekele
Engineering Services Unit
Department of Toxic Substances Control
5796 Corporate Avenue
Cypress, CA 90630

Ms. Valerie Mitchell
Human and Ecological Risk Office
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, California 95826-3200

c.c. Mr. Andy Cano
Geological Services Unit
Department of Toxic Substances Control
9211 Oakdale Avenue
Chatsworth, California 91311

Ms. Sayareh Amirebrahimi
Branch Chief
Brownfields and Environmental Restoration Program
Department of Toxic Substances Control
9211 Oakdale Avenue
Chatsworth, California 91311

Ms. Dot Lofstrom
Division Chief
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826

Phil Chandler
Unit Chief
Brownfields and Environmental Restoration Program
Department of Toxic Substances Control
9211 Oakdale Avenue
Chatsworth, California 91311



Department of Toxic Substances Control



Matthew Rodriguez
Secretary for
Environmental Protection

Barbara A. Lee, Director
8800 Cal Center Drive
Sacramento, California 95826-3200

Edmund G. Brown Jr.
Governor

January 21, 2015

Certified Mail No.: 7012 0470 0000 9528 8610

Ms. Anne M. LaPlace
First Vice President and Senior Counsel
Prologis, Incorporated
4545 Airport Way
Denver, Colorado 80239

FINANCIAL RESPONSIBILITY REVIEW FINDINGS – CCG ONTARIO – FORMER
KAISER STEEL – 9400 CHERRY AVENUE, FONTANA, CALIFORNIA, 92335,
ENVIRONMENTAL PROTECTION AGENCY IDENTIFICATION NUMBER
CAD008274938

Dear Ms. LaPlace:

On January 20, 2015, the California Environmental Protection Agency, Department of Toxic Substances Control (DTSC), conducted a financial responsibility review of Former Kaiser Steel, 9400 Cherry Avenue, Fontana, California. The enclosed review describes the findings of the review.

Because no violations were discovered during the review, no written response to this letter is required. DTSC appreciates your efforts to comply with the financial assurance regulations.

Please note: The Financial Test/Corporate Guarantee was not submitted within 90 days of the close of the fiscal year. All future submittals must be submitted within this time frame. The submittal for the fiscal year ending December 31, 2014 is due no later than March 31, 2015.

All pertinent information derived from the inspection, including financial assurance documents are included as attachments to the review.

This report will become a public document; you may request that any trade secret or facility security information be withheld from public disclosure. (See Health and Safety Code section 25173)

Ms. Anne M. LaPlace
January 21, 2015
Page 2

If you wish to assert the trade secret privilege after you have reviewed the report, please provide specific answers to each of the following questions for each item:

- To what extent is there knowledge of the information conveyed by the photograph/document outside of your business?
- To what extent is there knowledge of the information conveyed by the photograph/document, by employees and others in your business?
- To what extent have measures been taken to guard the secrecy of the information?
- Is the information valuable to competitors? If so, why?
- Has there been substantial monetary expenditure in the development of the information?
- Could the information be easily and properly acquired or duplicated by others?

DTSC will review your response to these questions to determine if the information should be treated as trade secret and will notify you of its decision.

If you have any questions regarding this letter, please contact Mr. Tayseer Mahmoud at (714) 484-5419 or Ms. Julie Mullins at (916) 255-3678.

Sincerely,



Jenny Aievoli, Chief
Financial Assurance Unit
Hazardous Waste Management Program

Enclosures

cc: See next page

Ms. Anne M. LaPlace
January 21, 2015
Page 3

cc: Ms. Eileen Mananian (w/o checklist enclosures)
Supervising Senior Environmental Scientist
Brownfields and Environmental Restoration Program
Department of Toxic Substances Control
5796 Corporate Avenue
Cypress, California 90630

Mr. Tayseer Mahmoud (w/o checklist enclosures)
Senior Hazardous Substances Engineer
Brownfields and Environmental Restoration Program
Department of Toxic Substances Control
5796 Corporate Avenue
Cypress, California 90630

Ms. Julie Mullins
Associate Governmental Program Analyst
Financial Assurance Unit
Hazardous Waste Management Program
Department of Toxic Substances Control
8800 Cal Center Drive, 3rd Floor
Sacramento, California 95826-3200

FINANCIAL RESPONSIBILITY REVIEW FINDINGS

To: Tayseer Mahmoud		Branch: Cleanup	
From: Julie Mullins		Office: R1	Phone No.: (916) 255-3678
FOR THE PURPOSE OF THE FINANCIAL RESPONSIBILITY REVIEW, THE RESULTS OF THE EVALUATION ARE GOOD FOR SIXTY (60) DAYS FROM THE DATE OF THIS REVIEW AND ARE AS FOLLOWS:			
FACILITY REVIEWED:			
Facility Name: Former Kaiser Steel		EPA ID No.: CAD008274938	
Facility Address: 9400 Cherry Avenue Fontana, CA 92335			
FINANCIAL ASSURANCE FOR CLOSURE	FINANCIAL ASSURANCE FOR OPERATIONS & MAINTENANCE	FINANCIAL ASSURANCE FOR CORRECTIVE ACTION	
<i>Results:</i> <input type="checkbox"/> PASS <input type="checkbox"/> FAIL <input checked="" type="checkbox"/> N/A	<i>Results:</i> <input checked="" type="checkbox"/> PASS <input type="checkbox"/> FAIL <input type="checkbox"/> N/A	<i>Results:</i> <input checked="" type="checkbox"/> PASS <input type="checkbox"/> FAIL <input type="checkbox"/> N/A	
Document Type(s):	Document Type(s): Financial Test/Corporate Guarantee	Document Type(s): Financial Test/Corporate Guarantee	
Document Amount Closure: \$	Document Amount Postclosure: \$4,406,237	Document Amount: \$3,802,255	
Closure Cost Estimate: \$	O&M Cost Estimate: \$4,406,237	Corrective Action Cost Estimate: \$3,802,255	
Deficiency Closure: \$	Deficiency Postclosure: \$0	Deficiency: \$0	
Violation(s):	Violation(s): None	Violation(s): None	

SUDDEN LIABILITY COVERAGE	NON-SUDDEN LIABILITY COVERAGE
<i>Results:</i> <input checked="" type="checkbox"/> PASS <input type="checkbox"/> FAIL <input type="checkbox"/> N/A	<i>Results:</i> <input type="checkbox"/> PASS <input type="checkbox"/> FAIL <input checked="" type="checkbox"/> N/A
Document Type(s): Financial Test/Corporate Guarantee	Document Type(s):
Document Amount Sudden: \$1m/\$2m	Document Amount Non-Sudden: \$
Deficiency Sudden: \$0	Deficiency Non-Sudden: \$
Violation(s): None	Violation(s):

COMMENTS:

Please note: The FT/CG was not submitted within 90 days of the close of the fiscal year. All future submittals must be submitted within this time frame. The submittal for the fiscal year ending December 31, 2014 is due no later than March 31, 2015.

Julie Mullins 1/20/15
 FR Analyst's Signature Date

Jenny Aiello 1/20/2015
 Supervisor's Signature Date

11-14-07



Dan Skopec
Acting Secretary
Cal/EPA

Department of Toxic Substances Control

Maureen F. Gorsen, Director
5796 Corporate Avenue
Cypress, California 90630



Arnold Schwarzenegger
Governor

November 14, 2007

Mr. David A. Thaete
Environmental Health & Safety Manager
Phibro - Tech, Inc.
8851 Dice Road
Santa Fe Springs, California 90670

**APPROVED CORRECTIVE ACTION COST ESTIMATE, PHIBRO-TECH,
INCORPORATED, 8851 DICE ROAD, SANTA FE SPRINGS, CALIFORNIA
(EPA ID NO CAD008488025)**

Dear Mr. Thaete:

This letter informs Phibro-tech Inc. (PTI) that the Department of Toxic Substances Control (DTSC) has determined that the approved cost estimate for corrective action financial assurance for the above referenced facility is \$5,627,760. DTSC has revised the cost estimate based on a number of factors, including RACER cost estimates, updated cost estimates provided by PTI, and assumptions (including, but not limited to, contingency assumptions) established by DTSC and PTI. Please refer to the enclosed DTSC Approved Corrective Action Cost Estimate Summary dated November 14, 2007 for more detailed information about the approved corrective action cost estimate. This cost estimate is DTSC's final number.

As you know, DTSC has been working closely with PTI over the past few weeks to develop an acceptable cost estimate. Pursuant to our October 29, 2007 meeting, PTI must provide DTSC, by November 21, 2007, with the information on when and how PTI will provide financial assurance to fund this full cost estimate. DTSC acknowledges that PTI has already posted \$3,380,000 via letter of credit. However, as we have previously informed you, this posted amount is neither acceptable nor enforceable unless and until PTI follows the regulatory requirements for a Class 1* permit modification. Further, PTI needs to immediately increase that amount to \$4.5 million pursuant to its October 29, 2007 agreement as discussed below.

In our November 13, 2007 letter we directed PTI to provide the Class 1* permit modification request letter for the \$ 3,380,000 by November 21, 2007. Additionally, we

Mr. David A. Thaete
November 14, 2007
Page 2 of 5

note that on October 29, 2007, PTI agreed to fund at least \$4.5 million in corrective action financial assurance by November 6, 2007. Zack Walton confirmed this via e-mail on November 1, 2007. Therefore, to be in compliance with its October 29 commitment, the Class 1* permit modification request letter that PTI is required to submit by November 21, 2007 should actually be for \$4.5 million. Likewise, the notices sent to the mailing list and the newspaper should mention the \$4.5 million. PTI also needs to fund the \$4.5 million immediately to be in order to comply with the promises it made on October 29, 2007.

As you also are aware, Section 12, Financial Assurance for Corrective Action, of the Hazardous Waste Facility Permit Modification (Permit), dated June 30, 1995, requires PTI to submit a Corrective Action Financial Assurance Plan (plan). At a minimum, the Permit requires this plan to include a cost estimate, financial mechanism and date when the mechanism will be established. PTI continues to be out of compliance with the Permit until it provides a financial mechanism to fund the approved cost estimate and a timeframe acceptable to DTSC to establish the mechanism that is approved by DTSC. On November 6, 2007, Zack Walton, on behalf of PTI, sent DTSC a proposal with financing options and mechanisms. At our October 29, 2007 meeting, DTSC explained why these types of approaches are not acceptable and we will follow up in our response to Mr. Walton's e-mail in the near future.

Please explain in your November 21, 2007 submittal when and how PTI will fund the full cost estimate, using a mechanism acceptable to DTSC. Assuming PTI initiates and completes the permit modification process to put \$4.5 million in place in the near future, any proposal by PTI to fund the difference between the \$4.5 million and the full cost estimate (approximately \$1.13 million) should include a very short time line for placing the full required amount in effect – including any required permit modifications.

If you have any questions or need clarification about the approved cost estimate and/or the Class 1* Permit Modification procedure, please contact Ms. Kathy San Miguel at (714) 484-5380 or me at (714) 484-5439.

Sincerely,
Original contains signature

Ms. Karen Baker, C.E.G., C.H.G., Chief
Geology, Permitting and Corrective Action Branch

Enclosure

cc: See next page

Phibro-Tech, Inc

DTSC Approved Corrective Action Cost Estimate Summary - November 14, 2007

	Completed	Subtotal	Total
E1/ Deed Restriction	Completed		\$ -
GROUNDWATER			
E2/ Groundwater Remediation GW Design/Build (accept PTI estimate)		\$325,500	
O&M (See below for additional cost basis) POTW discharge fee (accept PTI estimate)		\$1,911,088 \$600,211	
Total - E2/GW remediation		\$2,836,799	
E3/ GW Monitoring		\$1,154,718	
Total GW remediation & monitoring (E2+E3)			\$3,991,517
SOIL			
E4/ Soil Vapor Extraction (SVE)			
E5/ Bioventing (BV)			
Total Remaining SVE + BV (E4 + E5)			\$325,000
E6/ Design Build Site Cover	Completed		
E7/ Pond 1 Closure			NA
E8/ Slite Cover O & M	Based on facility not operating		\$231,206
E9/ Vadose Zone Monitoring	Abandon all sumps, non-operating site		\$3,423
E10/ Surface Water Sampling	100 year storm event, minimal cost, included as contingency		\$0

E11/Revise Site Wide Closure Plan	Minimal cost, included as contingency								\$0
E12/Financial Assurance for CA									NA
E13/New SWMU's									NA
Corrective Action Close Out and Documentation									\$138,654
Subtotal									\$4,689,800
Administrative, Engineering, Reporting, Fees and Contingencies	20% Contingency								\$937,960
Total Corrective Action Cost Estimate									\$5,627,760
Summary of DTSC Assumptions that Differ from PTI Assumptions									
GROUNDWATER O&M :									
Utilities	2 GW pumps								
	Air stripper - blower & transfer pump to POTW								
	Heater & humidity control for VGAC								
	\$0.11/KWH								
	annual cost								\$9,972
	30 yrs								
	Treatment system O&M - labor & expenses								\$299,160
	average labor rate								\$100/hr
	annual labor hour								8000 hr
	cartridge replacement (1/month)								\$250/month
	maintenance material								\$300/yr
	equipment replacement (pumps, blower, etc.)								\$24,000
	30 yrs								
	Treatment System monitoring								\$923,000
	Performance monitoring								
	GW extraction (2 wells): qrtly-VOCs, metals, Cr+6, TPH								
	system: monthly -influent & effluent, VOCs								
	Compliance monitoring								
	POTW: qrtly-TTO,SS,COD,metals								
	SCAQM: monthly-influent&effluent, VOCs								
	30 yrs								
	VGAC change out cost of VGAC (accepted PTI estimate)								\$441,330

IRIS ENVIRONMENTAL



Via Email

February 21, 2013

Mr. Stephen McArdle
Department of Toxic Substances Control
Chatsworth Field Office
9211 Oakdale Avenue
Chatsworth, CA 91311-6505

**Re: EVALUATION OF FINANCIAL ASSURANCE ESTIMATES
Phibro-Tech, Inc.
Santa Fe Springs, California
Corrective Action Consent Order, Docket HWCA P4-11/12-003
Iris Environmental Contract No. 06-441A**

Dear Mr. McArdle:

On behalf of Phibro-Tech, Inc., Iris Environmental has conducted a screening-level assessment of current financial assurance cost estimates for corrective measures at the Phibro-Tech, Inc. facility in Santa Fe Springs, California. This submittal is in accordance with Section 10.1.9 of the Corrective Action Consent Order, dated February 22, 2012.

The existing financial assurance amount of \$5,627,760 was established through extensive discussions with the Department and finalized in correspondence on November 14, 2007. The 2007 estimate was based on soil vapor extraction, groundwater extraction/treatment, monitoring, and closure programs.

Based on our review of the progress of the current soil vapor extraction, monitoring, and pilot test programs, we have concluded that the current financial assurance amount likely exceeds the projected costs for approved corrective action. The recent success of the insitu fixation pilot test program to remediate soil and groundwater will likely result in a formal request to change the groundwater remedy from groundwater extraction and treatment to insitu fixation. Phibro-Tech, Inc. therefore requests that the current financial assurance amount be left in place until the groundwater remedy change has been evaluated.

If you have any comments or questions, please feel free to contact me at (510) 834-4747 ext. 21.

Sincerely,
IRIS ENVIRONMENTAL

Christopher S. Alger, P.G.
Principal Engineering Geologist

CC: Dwight Glover, Phibro-Tech, Inc.
David Thaete, Phibro-Tech, Inc.
Zachary Walton, SSL Law Firm LLP
Paul Peña, Phibro-Tech, Inc.

**Permitted Facilities with Corrective Action
Financial Assurance Update
July 8, 2016**

EPA ID Number	No.	Facility Name	Regulatory Status	Permit Type	Closure Financial Assurance Mechanism Type	Closure Amount	Post-Closure Financial Assurance Mechanism Type	Post-Closure Amount	Facility Status	Is There Known Contamination?	Is Financial Assurance for Corrective Action Required?	What is the Financial Assurance Corrective Action Amount	Corrective Action Financial Assurance Mechanism Type	Corrective Action Financial Assurance Notes
CAD041835695	1	Acme Fill Corp	RCRA	Post Closure Permit	Ins	\$12,278,034	Ins	\$24,336,712	RCRA Permit, Corrective Action has been Implemented with Financial Assurance	Yes	Yes	\$136,799	In Post-closure FA	
CAT080012602	2	D/K Dixon	Standardized	Operating Permit	LOC	\$226,750	NA	NA	Standardized Permit, Referred to Other Agencies	Yes	No, Referred to RWQCB See Note	RWQCB Jurisdiction	RWQCB Jurisdiction	UST removal referred to RWQCB and Solano County
CAT080025711	3	Advanced Environmental, Inc. Fontana	Standardized	Operating Permit	LOC	\$541,423	NA	NA	Standardized Permit, Corrective Action has been Implemented	Yes*	No, Contamination Removed, See Note	Not Required	Not Required	Remedy Constructed; Contamination has been removed; No Further Corrective Action required; Cleanup completed.
CAD982411993	4	AERC Com, Inc.	Standardized	Operating Permit	CD	\$63,108	NA	NA	Standardized Permit with No Contamination	No	No	Not Applicable	Not Applicable	
CAD000030494	5	Aerojet Rocketdyne Inc. Rancho Cordova	RCRA	Operating Permit/Post Closure Permit	SB/P	\$890,817	SB/P	\$4,078,543	RCRA Permit, Referred to Other Agency, has Financial Assurance for Corrective Action	Yes	Yes	\$4,078,543	In Post-closure FA	EPA is the lead for the majority of the cleanup work on this site under CERCLA.
CAL000330453	6	Agritec International, Ltd. (dba Clean Tech Environmental, Inc.)	State Only	Operating Permit	Ins	\$304,989	NA	NA	State Permit with No Contamination	No	No	Not Applicable	Not Applicable	
CAD981427669	7	American Oil Company	Standardized	Operating Permit	CD	\$38,077	NA	NA	Standardized Permit, Investigated, No Further Action Required	No	No	Not Applicable	Not Applicable	
CAD980694103	8	Asbury Environmental Services Chico II, LLC	Standardized	Operating Permit	LOC	\$55,416	NA	NA	Standardized Permit with No Contamination	No	No	Not Applicable	Not Applicable	
CAL000827844	9	Asbury Environmental Services Chico	Standardized	Operating Permit	LOC	\$139,078	NA	NA	Standardized Permit with No Contamination	No	No	Not Applicable	Not Applicable	
CAL930256136	10	Asbury Environmental Services Fortuna	Standardized	Operating Permit	LOC	\$45,717	NA	NA	Standardized Permit with No Contamination	No	No	Not Applicable	Not Applicable	
CAL000098454	11	Atlas Precious Metals	Standardized	Operating Permit	TA	\$10,000	NA	NA	Standardized Permit with No Contamination	No	No	Not Applicable	Not Applicable	
CAL000282598	12	Bakersfield Transfer Inc.	State Only	Operating Permit	TA	\$384,570	NA	NA	State Permit with No Contamination	No	No	Not Applicable	Not Applicable	
CAD088838222	13	Bayside Oil, Inc.	Standardized	Operating Permit	CD	\$106,103	NA	NA	Standardized Permit with No Contamination	No	No	Not Applicable	Not Applicable	
CAD981426539	14	Best Environmental, LLC	Standardized	Operating Permit	TA	\$47,824	NA	NA	Standardized Permit, Under Investigation, Will be Evaluated for Up-front Financial Assurance for Corrective Action	Yes	No, Under Investigation, FA will be Required After Remedy Selection, See Note	Not Applicable	Not Applicable	Financial assurance is required when the final remedy is selected. We will require financial assurance at that time.
CAD067786749	15	BKK Landfill	RCRA	Referred to Cleanup Program	Ins	\$160,680	Ins	\$6,723,420	RCRA Permit, Under Investigation, Has Post-Closure Financial Assurance	Yes	No, Groundwater Under Investigation, FA will be Required After Remedy Selection, See Note	Not Applicable	Not Applicable	Referred to EPA as lead agency (Etor date: 4/1/1984); State Cleanup Program is not Lead for Financial Assurance enforcement; U.S. EPA maintained lead for corrective action and DTSC Permitting was lead for permitting and post-closure until late 2004. Currently, DTSC's Cleanup Program oversees cleanup and post-closure care by potentially responsible parties pursuant to CERCLA and HSC Chapter 6.8 via federal consent decrees.

**Permitted Facilities with Corrective Action
Financial Assurance Update
July 8, 2016**

EPA ID Number	No.	Facility Name	Regulatory Status	Permit Type	Closure Financial Assurance Mechanism Type	Closure Amount	Post-Closure Financial Assurance Mechanism Type	Post-Closure Amount	Facility Status	Is There Known Contamination?	Is Financial Assurance for Corrective Action Required?	What is the Financial Assurance Corrective Action Amount	Corrective Action Financial Assurance Mechanism Type	Corrective Action Financial Assurance Notes
CAD093365435	16	Boeing Company - Santa Susana Field Laboratory - Canoga Park	RCRA	Post Closure Permit	LOC	\$1,956,014	LOC	\$24,364,225	RCRA Permit, Under Investigation, Has Post-Closure Financial Assurance	Yes	No, Under Investigation, FA will be Required After Remedy Selection, See Note	Not Applicable	Not Applicable	Financial assurance is required when the final remedy is selected. We will require financial assurance at that time.
CA4170024414	17	California Resources Elk Hills, LLC	RCRA	Post Closure Permit	NA	NA	Financial Guarantee Bond	\$1,050,000	RCRA Permit, exempt From Financial Assurance	Yes	No, Exempt, See Note	Exempt	Exempt	Department of Energy (DOE), by law, is exempt from Financial Assurance Requirements.
CAD059277137	18	Central Wire, Inc.	RCRA	Post Closure Permit	NA	NA	LOC	\$2,000,000	RCRA Permit, Corrective Action has been Implemented	Yes	Yes	\$1,110,000	In Post-closure FA	
CAT000646117	19	Chemical Waste Management, Inc. Kettleman	RCRA	Operating Permit	Ins	\$23,186,481	Ins	\$32,646,905	RCRA Permit, Corrective Action has been Implemented	Yes	Yes	\$1,944,000	In Post-closure FA	
CAD009151671	20	Chemours Company FC LLC Oakley	RCRA	Post Closure Permit	NA	NA	SB/P	\$18,069,306	RCRA Permit, Corrective Action has been Implemented with Financial Assurance	Yes	Yes	\$12,178,781	In Post-closure FA	
CAD009142290	21	Chemtrade Logistics, Inc.	RCRA	Operating Permit	LOC	\$143,068	NA	NA	RCRA Permits, Corrective Action will be Implemented within 2 years	Yes	No, Under Investigation, FA will be Required After Remedy Selection, See Note	Not Applicable	Not Applicable	Financial assurance is required when the final remedy is selected. We will require financial assurance at that time.
CAD043237486	22	Chevron Chemical Company Richmond	RCRA	Operating Permit	CG	\$87,957,176	CG	\$19,533,914.00	Has FA for CA	Yes	Yes	\$17,870,970	CG	
CAD008336901	23	Chevron USA, Inc. El Segundo Refinery	RCRA	Operating Permit	CG	\$3,058,206	CG	\$11,367,549	RCRA Permit, Referred to Other Agency	Yes	No, Referred to RWQCB, See Note	RWQCB Jurisdiction	RWQCB Jurisdiction	Referred to RWQCB (11/5/97)
CAD009114919	24	Chevron USA, Inc. Richmond Refinery	RCRA	Operating Permit	CG	\$1,476,201	CG	\$19,122,004	RCRA Permit, Referred to Other Agency, has Financial Assurance for Corrective Action	Yes	No, Referred to RWQCB, See Note	RWQCB Jurisdiction	RWQCB Jurisdiction	Referred to RWQCB (9/23/97)
CAT080010283	25	EPC Westside Disposal Facility	RCRA	Post Closure Permit	NA	NA	CG	\$1,272,285	RCRA Permit, Corrective Action has been Implemented	Yes	Yes	\$1,272,285	In Post-closure FA	
CAD050806850	26	Clean Harbors - Los Angeles	RCRA	Operating Permit	Ins	\$1,250,612	NA	NA	RCRA Permit, Corrective Action has been Implemented	Yes*	No, Contamination Removed, See Note	Not Required	Not Required	RCRA Facility Assessment Concluded No Further Action Required
CAD982439895	27	Clean Harbors - Redwood City	Standardized	Operating Permit	Ins	\$695,300	NA	NA	Standardized Permit with No Contamination	No	No	Not Applicable	Not Applicable	
CAD059494310	28	Clean Harbors - San Jose	RCRA	Operating Permit	Ins	\$6,527,275	NA	NA	RCRA Permit, Referred to Other Agency, has Financial Assurance for Corrective Action	Yes	Yes	\$589,501	Ins	
CAD000633164	29	Clean Harbors - Westmorland	RCRA	Operating Permit	Ins	\$2,870,034	Ins	\$11,281,772	RCRA Permit, Corrective Action has been Implemented	Yes*	No, Contamination Removed, See Note	Not Required	Not Required	Remedy Constructed; Surface impoundments clean closed.

**Permitted Facilities with Corrective Action
Financial Assurance Update
July 8, 2016**

EPA ID Number	No.	Facility Name	Regulatory Status	Permit Type	Closure Financial Assurance Mechanism Type	Closure Amount	Post-Closure Financial Assurance Mechanism Type	Post-Closure Amount	Facility Status	Is There Known Contamination?	Is Financial Assurance for Corrective Action Required?	What is the Financial Assurance Corrective Action Amount	Corrective Action Financial Assurance Mechanism Type	Corrective Action Financial Assurance Notes
CAD044429835	30	Clean Harbors - Wilmington	RCRA	Operating Permit	Ins	\$1,818,259	NA	NA	RCRA Permit, Corrective Action has been Implemented	Yes*	No, Contamination Removed, See Note	Not Required	Not Required	RCRA Facility Assessment with No Further Action required; Contamination has been removed; Cleanup Completed.
CAD980675276	31	Clean Harbors Buttonwillow LLC	RCRA	Operating Permit	Ins	\$8,303,931	Ins	\$13,549,997	RCRA Permit, Corrective Action has been Implemented	Yes*	No, Contamination Removed, See Note	Not Required	Not Required	Remedy Constructed; Surface impoundments clean closed; Contamination has been removed; Cleanup completed.
CAT080010606	32	Big Blue Hills Pesticide Cont Disposal	RCRA	Post Closure Permit	NA	NA	LOC	\$1,468,124	RCRA Permit, Corrective Action has been Implemented	Yes	Yes	\$835,934	In Post-closure FA	
CAD980813950	33	Crane's Waste Oil, Inc.	Standardized	Operating Permit	CD	\$41,743	NA	NA	Standardized Permit with No Contamination	No	No	Not Applicable	Not Applicable	
CAD028409019	34	Crosby & Overton	RCRA	Operating Permit	LOC/TA	\$1,189,405	LOC/TA	\$98,270	RCRA Permit, Corrective Action has been Implemented	Yes	Yes	\$98,270	In Post-closure FA	
CAT080033681	35	D/K Environmental	RCRA	Operating Permit	LOC	\$426,982	NA	NA	RCRA Permit, Corrective Action has been Implemented	Yes*	No, Contamination Removed, See Note	Not Required	Not Required	Remedy Implemented; Contamination has been removed; No Further Corrective Action required; Cleanup completed.
CAL000110141	36	David H. Fell & Company	Standardized	Operating Permit	CD	\$47,680	NA	NA	Standardized Permit with No Contamination	No	No	Not Applicable	Not Applicable	
CAT080013352	37	DeMenno/Kerdoon	RCRA	Operating Permit	LOC	\$8,457,498	NA	NA	RCRA Permits, Corrective Action will be Implemented within 2 years	Yes	Yes	\$1,200,000	In Post-closure FA	
CA9570025149	38	Dept. of Air Force Vandenberg AFB	RCRA	Operating Permit	Exempt	Exempt	Exempt	Exempt	RCRA Permit, exempt From Financial Assurance	Yes	No, Exempt, See Note	Exempt	Exempt	Department of Defense (DOD), by law, is exempt from Financial Assurance Requirements.
CAD076528678	39	Dow Chemical - Pittsburg	RCRA	Operating Permit	CG	\$3,180,600	CG	\$6,518,200	RCRA Permit, Referred to Other Agency, has Financial Assurance for Corrective Action	Yes	Yes	\$69,383,000	CG	The Regional Water Control Board (Region 2) was designated lead oversight agency for this facility. They are responsible for Corrective Action oversight, and concur with the FA CA amount.
CAD093245645	40	Ducommun Aerostructures	RCRA	Post Closure Permit	NA	NA	SB/P	\$881,332	RCRA Permit, Under Investigation, Will be Evaluated for Up-front Financial Assurance for Corrective Action	Yes	No, Implementing Interim Measures See Note	Will Be Required	Will Be Required	Financial assurance is required when the final remedy is selected. We will require financial assurance at that time.
CAT080011653	41	Duke Energy Moss Landing, LLC (Dynergy Moss Landing, LLC/PG&E Moss Landing)	RCRA	Operating Permit	LOC	\$1,775,600	LOC	\$1,142,700	RCRA Permit, Under Investigation, Has Post-Closure Financial Assurance	Yes	Yes	\$274,999 (CA) + \$8,706,600 (contingency)	FT/In Post-closure FA	Contingent Closure and Post-Closure Costs for the worst case scenario of Closure as a landfill and Post-closure monitoring for 30 years is included in the Financial Assurance as upfront Financial Assurance for Corrective Action.
CAD009466392	42	Ecology Control Industries Richmond	Standardized	Operating Permit	TA	\$110,280	NA	NA	Standardized Permit, Investigated, No Further Action Required	Yes*	No, Contamination Removed, See Note	Not Required	Not Required	No Further Action Required

**Permitted Facilities with Corrective Action
Financial Assurance Update
July 8, 2016**

EPA ID Number	No.	Facility Name	Regulatory Status	Permit Type	Closure Financial Assurance Mechanism Type	Closure Amount	Post-Closure Financial Assurance Mechanism Type	Post-Closure Amount	Facility Status	Is There Known Contamination?	Is Financial Assurance for Corrective Action Required?	What is the Financial Assurance Corrective Action Amount	Corrective Action Financial Assurance Mechanism Type	Corrective Action Financial Assurance Notes
CAD003963592	43	ECS Refining	Standardized	Operating Permit	CD	\$308,540	NA	NA	Standardized Permit, Under Investigation, Will be Evaluated for Up-front Financial Assurance for Corrective Action	Yes	Yes	See Note	See Note	Contingent Closure and Post-Closure Costs are being negotiated for the worst case scenario of Closure as a landfill and Post-closure monitoring for 30 years as upfront Financial Assurance for Corrective Action.
CA1570024504	44	Edwards Air Force Base	RCRA	Operating Permit	exempt	exempt	exempt	exempt	RCRA Permit, exempt From Financial Assurance	Yes	No, Exempt, See Note	Exempt	Exempt	Department of Defense (DOD), by law, is exempt from Financial Assurance Requirements.
CAD097030993	45	Evoqua Water Technologies, LLC	RCRA	Operating Permit	SB/F	\$5,239,470	NA	NA	RCRA Permit, Corrective Action has been Implemented	Yes*	No, Contamination Removed, See Note	Not Required	Not Required	Remedy Constructed; Contamination has been removed; No Further Corrective Action required; Cleanup completed.
CAD982444481	46	Filter Recycling Services, Inc.	Standardized	Operating Permit	TA	\$351,745	NA	NA	Standardized Permit with No Contamination	No	No	Not Applicable	Not Applicable	
CAD990794133	47	Forward, Inc.	RCRA	Post Closure Permit	NA	NA	LOC	\$1,528,667	RCRA Permit, Corrective Action has been Implemented	Yes	Yes	\$1,528,667	In Post-closure FA	
CAD030584502	48	General Electric Anaheim	RCRA	Operating Permit	FT	\$625,233	NA	NA	RCRA Permits, Corrective Action will be Implemented within 2 years	Yes	No, Under Investigation, FA will be Required After Remedy Selection, See Note	Not Applicable	Not Applicable	Financial assurance is required when the final remedy is selected. We will require financial assurance at that time.
CAD980884183	49	GEM of Rancho Cordova LLC	RCRA	Operating Permit	SB/P	\$976,038	NA	NA	RCRA Permit, Corrective Action has been Implemented	Yes*	No, Contamination Removed, See Note	Not Required	Not Required	Corrective Action has been completed with a No Further Action Determination; Contamination has been removed; Cleanup completed.
CAD069124717	50	Glencore Recycling, Inc.	Standardized	Operating Permit	LOC	\$530,000	NA	NA	Standardized Permit, Corrective Action has been Implemented	Yes*	No, Contamination Removed, See Note	Not Required	Not Required	Remedy Constructed; Contamination has been removed; No Further Corrective Action required; Cleanup completed.
CAD060398229	51	Heraeus Metal Processing Company	Standardized	Operating Permit	LOC - Amd #8	\$2,709,113	NA	NA	Standardized Permit with No Contamination	No	No	Not Applicable	Not Applicable	
CAR000128793	52	HGST Hitachi Global Storage Technologies, Inc.	RCRA	Operating Permit	FT	\$28,353,244	NA	NA	RCRA Permit, Corrective Action has been Implemented	Yes*	No, Contamination Removed, See Note	Not Required	Not Required	Remedy Constructed; Contamination has been removed; No Further Corrective Action required; Cleanup completed.
CAD074644659	53	Honeywell International Inc. former Baron-Blakeslee Newark	RCRA	Post Closure Permit	NA	NA	FT	\$2,250,000	RCRA Permit, Referred to Other Agency	Yes	No, Referred to RWQCB See Note	RWQCB Jurisdiction	RWQCB Jurisdiction	Remedy Complete. Water Board is the Lead Agency for Corrective Action.
CAD099452708	54	Industrial Service Oil Co., Inc.	RCRA	Operating Permit	Ins	\$1,769,381	NA	NA	RCRA Permits, Corrective Action will be Implemented within 2 years	Yes	No, Under Investigation, FA will be Required After Remedy Selection, See Note	Not Applicable	Not Applicable	Financial assurance is required when the final remedy is selected. We will require financial assurance at that time.
CAD000633289	55	IT Corporation Benson Ridge	RCRA	Post Closure Permit	NA	NA	Ins	\$389,564	RCRA Permit, Corrective Action has been Implemented with Financial Assurance	Yes	Yes	\$389,564	In Post-closure FA	

**Permitted Facilities with Corrective Action
Financial Assurance Update
July 8, 2016**

EPA ID Number	No.	Facility Name	Regulatory Status	Permit Type	Closure Financial Assurance Mechanism Type	Closure Amount	Post-Closure Financial Assurance Mechanism Type	Post-Closure Amount	Facility Status	Is There Known Contamination?	Is Financial Assurance for Corrective Action Required?	What is the Financial Assurance Corrective Action Amount	Corrective Action Financial Assurance Mechanism Type	Corrective Action Financial Assurance Notes
CAD000060012	56	IT Corporation Panoche	RCRA	Post Closure Permit	NA	NA	Ins	\$2,785,979	RCRA Permit, Corrective Action has been Implemented with Financial Assurance	Yes	Yes	\$2,785,979	In Post-closure FA	
CAD982521460	57	IT Corporation Vine Hill	RCRA	Post Closure Permit	NA	NA	Ins	\$3,569,230	RCRA Permit, Corrective Action has been Implemented with Financial Assurance	Yes	Yes	\$3,569,230	In Post-closure FA	
CAD079089512	58	IT Corporation Montezuma	RCRA	Post Closure Permit	NA	NA	Ins	\$1,548,120	RCRA Permit, Corrective Action has been Implemented with Financial Assurance	Yes	Yes	\$1,548,120	In Post-closure FA	
CAD982052797	59	J & B Enterprises	Standardized	Operating Permit	CD	\$109,546	NA	NA	Standardized Permit with No Contamination	No	No	Not Applicable	Not Applicable	
CAD990665432	60	John Smith Road Landfill	RCRA	Post Closure Permit	NA	NA	TA	\$261,927	RCRA Permit, Corrective Action has been Implemented	Yes*	No, Corrective Action Complete See Note	Not Required	Not Required	Remedy Constructed landfill closed; No Further Corrective Action required; Cleanup is complete, under post-closure monitoring.
CAD008274938	61	Kaiser Ventures, Inc.	RCRA	Post Closure Permit Application	NA	NA	CG	\$4,406,237	RCRA Permit, Corrective Action has been Implemented with Financial Assurance	Yes	Yes	\$3,802,255	CG	Amounts for Post-Closure and Corrective Action were transposed in the June 7th, 2016 version of this spreadsheet. Data has been corrected.
CAD981429715	62	Kearney KPF	RCRA	Post Closure Permit	NA	NA	TA	\$1,534,855	RCRA Permit, Corrective Action has been Implemented	Yes	Yes	\$86,678	In Post-closure FA	
CAD088504881	63	Kinsbursky Brothers Supply, Inc.	RCRA	Operating Permit	TA	\$1,138,293	NA	NA	RCRA Permit, Under Investigation, Will be Evaluated for Up-front Financial Assurance for Corrective Action	Yes	No, Under Investigation, FA will be Required After Remedy Selection, See Note	Not Applicable	Not Applicable	Financial assurance is required when the final remedy is selected. We will require financial assurance at that time.
CAD982435026	64	KW Plastics	RCRA	Operating Permit	TA	\$487,779	NA	NA	RCRA Permit, Corrective Action has been Implemented	Under investigation	No, Under Investigation, FA will be Required After Remedy Selection, See Note	Not Applicable	Not Applicable	Financial assurance is required when the final remedy is selected. We will require financial assurance at that time.
CA4890008986	65	Lawrence Berkeley National Laboratory	RCRA	Operating Permit	Exempt	Exempt	Exempt	Exempt	RCRA Permit, exempt From Financial Assurance	Yes	No, Exempt, See Note	Exempt	Exempt	Department of Energy (DOE), by law, is exempt from Financial Assurance Requirements.
CA2890012584	66	Lawrence Livermore National Laboratory	RCRA	Operating Permit	Exempt	Exempt	Exempt	Exempt	RCRA Permit, exempt From Financial Assurance	Yes	No, Exempt, See Note	Exempt	Exempt	Department of Energy (DOE), by law, is exempt from Financial Assurance Requirements.
CA2890090002	67	Lawrence Livermore National Laboratory Site 300	RCRA	Operating Permit/Post Closure Permit	Exempt	Exempt	Exempt	Exempt	RCRA Permit, exempt From Financial Assurance	Yes	No, Exempt, See Note	Exempt	Exempt	Department of Energy (DOE), by law, is exempt from Financial Assurance Requirements.
CAR000156125	68	Lighting Resources, Inc.	Standardized	Operating Permit	TA	\$92,089	NA	NA	Standardized Permit with No Contamination	No	No	Not Applicable	Not Applicable	
CAD030398622	69	Former International Light Metal Corp	RCRA	Post Closure Permit	NA	NA	LOC	\$18,609,049	RCRA Permit, Under Investigation, Has Post-Closure Financial Assurance	Yes	Yes	\$18,609,049	In Post-closure FA	The Financial Mechanism (Letter of Credit) includes a combined amount for both Post Closure and Corrective Action. However, the entire amount in FA for this facility will be transferred to Corrective Action during the next financial assurance review.
CA1800090010	70	National Aeronautics and Space Administration Santa Susana Field Lab	RCRA	Post Closure Permit	Exempt	Exempt	Exempt	Exempt	RCRA Permit, exempt From Financial Assurance	Yes	No, Exempt, See Note	Exempt	Exempt	Department of Energy (DOE), by law, is exempt from Financial Assurance Requirements.

**Permitted Facilities with Corrective Action
Financial Assurance Update
July 8, 2016**

EPA ID Number	No.	Facility Name	Regulatory Status	Permit Type	Closure Financial Assurance Mechanism Type	Closure Amount	Post-Closure Financial Assurance Mechanism Type	Post-Closure Amount	Facility Status	Is There Known Contamination?	Is Financial Assurance for Corrective Action Required?	What is the Financial Assurance Corrective Action Amount	Corrective Action Financial Assurance Mechanism Type	Corrective Action Financial Assurance Notes
CA7170090016	71	Naval Air Station North Island	RCRA	Operating Permit	Exempt	Exempt	Exempt	Exempt	RCRA Permit, exempt From Financial Assurance	Yes	No, Exempt, See Note	Exempt	Exempt	Department of Defense (DOD), by law, is exempt from Financial Assurance Requirements.
CA2170023152	72	Naval Air Weapons Station China Lake	RCRA	Operating Permit	Exempt	Exempt	Exempt	Exempt	RCRA Permit, exempt From Financial Assurance	Yes	No, Exempt, See Note	Exempt	Exempt	Department of Defense (DOD), by law, is exempt from Financial Assurance Requirements.
CAR000019430	73	Naval Base Coronado	RCRA	Operating Permit	Exempt	Exempt	Exempt	Exempt	Permitted Facilities with No Contamination, exempt from Financial Assurance	No	No	Not Applicable	Not Applicable	
CA6170024289	74	Naval Station San Diego	RCRA	Operating Permit	Exempt	Exempt	Exempt	Exempt	Permitted Facilities with No Contamination, exempt from Financial Assurance	No	No	Not Applicable	Not Applicable	
CAL000024110	75	P. Kay Metal Supply, Inc.	Standardized	Operating Permit	TA	\$150,219	NA	NA	Standardized Permit, Under Investigation, Will be Evaluated for Up-front Financial Assurance for Corrective Action	Yes	No, Under Investigation, FA will be Required After Remedy Selection, See Note	Not Applicable	Not Applicable	Financial assurance is required when the final remedy is selected. We will require financial assurance at that time.
CAD077966349	76	Pacific Gas & Electric Diablo Canyon	RCRA	Operating Permit	FT	\$1,144,169	NA	NA	RCRA Permits with No Contamination.	No	No	Not Applicable	Not Applicable	
CAD008252405	77	Pacific Resource Recovery Services	RCRA	Operating Permit	LOC	\$1,044,000	NA	NA	RCRA Permit, Under Investigation, Will be Evaluated for Up-front Financial Assurance for Corrective Action	Yes	No, Under Investigation, FA will be Required After Remedy Selection, See Note	Not Required at This Time	Not Required at This Time	Financial assurance is required when the final remedy is selected. We will require financial assurance at that time.
CAD009220898	78	Pacific Scientific Energetic Materials Company	RCRA	Operating Permit	LOC	\$696,537	NA	NA	RCRA Permit, Referred to Other Agency	Yes	No, Referred to RWQCB, See Note	RWQCB Jurisdiction	RWQCB Jurisdiction	Referred to RWQCB (1/1/2008).
CAD008488025	79	Phibro Tech	RCRA	Operating Permit	LOC	\$1,848,717.45 (Separate from CA amount)	NA	NA	RCRA Permit, Corrective Action has been Implemented with Financial Assurance	Yes	Yes	\$5,627,760	LOC	
CAD980881676	80	Phillips 66 (fka Conoco Phillips Company) - Carson Plant	RCRA	Post Closure Permit	NA	NA	CG	\$2,547,023	RCRA Permit, Referred to Other Agency	Yes	No, Referred to RWQCB, See Note	RWQCB Jurisdiction	RWQCB Jurisdiction	Referred to RWQCB (10/29/1997).
CAD009108705	81	Phillips 66 Company San Francisco Refinery	RCRA	Post Closure Permit	NA	NA	CG	\$3,430,861	RCRA Permit, Referred to Other Agency	Yes	No, Referred to RWQCB, See Note	RWQCB Jurisdiction	RWQCB Jurisdiction	Referred to RWQCB (9/22/1997).
CAD008237679	82	Phillips 66 Wilmington Plant	RCRA	Post Closure Permit	NA	NA	CG	\$2,547,023	RCRA Permit, Referred to Other Agency	Yes	No, Referred to RWQCB, See Note	RWQCB Jurisdiction	RWQCB Jurisdiction	Referred to RWQCB (10/29/1997).
CAD001705235	83	United Technologies Corporation Pratt and Whitney Rocketdyne San Jose	RCRA	Operating Permit/Post Closure Permit	LOC	\$4,878,147	LOC	\$7,821,853	RCRA Permit, Referred to Other Agency	Yes	No, Referred to RWQCB, See Note	RWQCB Jurisdiction	RWQCB Jurisdiction	Referred to RWQCB (9/30/1997).
CAD066233966	84	Quemetco, Inc.	RCRA	Operating Permit	Ins	\$7,800,000	Ins	\$1,000,000	RCRA Permit, Corrective Action has been Implemented with Financial Assurance	Yes	Yes	\$454,790	Ins	
CAD044003556	85	Ramos Environmental Services	Standardized	Operating Permit	SB	\$174,439	NA	NA	Standardized Permit with No Contamination	No	No	Not Applicable	Not Applicable	

**Permitted Facilities with Corrective Action
Financial Assurance Update
July 8, 2016**

EPA ID Number	No.	Facility Name	Regulatory Status	Permit Type	Closure Financial Assurance Mechanism Type	Closure Amount	Post-Closure Financial Assurance Mechanism Type	Post-Closure Amount	Facility Status	Is There Known Contamination?	Is Financial Assurance for Corrective Action Required?	What is the Financial Assurance Corrective Action Amount	Corrective Action Financial Assurance Mechanism Type	Corrective Action Financial Assurance Notes
CAD000633230	86	Raytheon Space and Airborne Systems El Segundo	RCRA	Operating Permit	LOC	\$921,482	NA	NA	RCRA Permit, Under Investigation, Will be Evaluated for Up-front Financial Assurance for Corrective Action	Yes	No, Under Investigation, FA will be Required After Remedy Selection, See Note	Not Applicable	Not Applicable	Financial assurance is required when the final remedy is selected. We will require financial assurance at that time.
CAD008364432	87	Rho-Chem, LLC	RCRA	Operating Permit	SB/P	\$1,958,574	NA	NA	RCRA Permit, Under Investigation, Will be Evaluated for Up-front Financial Assurance for Corrective Action	Yes	No, Under Investigation, FA will be Required After Remedy Selection, See Note	Not Applicable	Not Applicable	Financial assurance is required when the final remedy is selected. We will require financial assurance at that time.
CA7210020759	88	Riverbank Army Ammunition Plant	RCRA	Operating Permit	Exempt	Exempt	Exempt	Exempt	RCRA Permit, exempt From Financial Assurance	Yes	No, Exempt, See Note	Exempt	Exempt	Department of Defense (DOD), by law, is exempt from Financial Assurance Requirements.
CAL000190816	89	Riverbank Oil Transfer, LLC	Standardized	Operating Permit	CD	\$100,000	NA	NA	Standardized Permit with No Contamination	No	No	Not Applicable	Not Applicable	
CAT000613893	90	Safety Kleen Systems, Inc. El Monte Accumulation Center	RCRA	Operating Permit	Ins	\$395,891	NA	NA	RCRA Permit, Referred to Other Agency	Yes	No, Referred to EPA, See Note	EPA Jurisdiction	EPA Jurisdiction	Referred to EPA (1/1/2008).
CAT000613976	91	Safety Kleen Systems, Inc. Santa Ana	RCRA	Operating Permit	Ins	\$289,753	NA	NA	RCRA Permit, Investigated No Further Action Required	Yes*	No, No Action Required	Not Required	Not Required	No Action Required.
CA0000084517	92	Safety Kleen Systems, Inc. Sacramento	RCRA	Operating Permit	Ins	\$371,069	NA	NA	RCRA Permit, Investigated No Further Action Required	Yes*	No, No Action Required	Not Required	Not Required	No Action Required.
CAD066113465	93	Safety Kleen Fresno	RCRA	Operating Permit	Ins	\$186,496	NA	NA	RCRA Permit, Under Investigation, Will be Evaluated for Up-front Financial Assurance for Corrective Action	Yes	No, Under Investigation, FA will be Required After Remedy Selection, See Note	Not Required	Not Required	Financial assurance is required when the final remedy is selected. We will require financial assurance at that time.
CAT000613927	94	Safety Kleen Systems, Inc. Highland Service Center	RCRA	Operating Permit	Ins	\$186,909	NA	NA	RCRA Permit, Investigated No Further Action Required	Yes*	No, No Action Required	Not Required	Not Required	No Action Required.
CAT000613935	95	Safety Kleen Systems, Inc. Los Angeles	RCRA	Operating Permit	Ins	\$201,523	NA	NA	RCRA Permit, Investigated No Further Action Required	Yes*	No, No Action Required	Not Required	Not Required	No Action Required.
CAD980887418	96	Safety Kleen of California, Inc. Newark	RCRA	Operating Permit	Ins	\$2,576,623	NA	NA	RCRA Permit, Under Investigation, Will be Evaluated for Up-front Financial Assurance for Corrective Action	Yes	No, Under Investigation, FA will be Required After Remedy Selection, See Note	Not Applicable	Not Applicable	Financial assurance is required when the final remedy is selected. We will require financial assurance at that time.
CAD982446882	97	Safety Kleen of California, Inc. Fresno	Standardized	Operating Permit	Ins	\$95,085	NA	NA	Standardized Permit with No Contamination	No	No	Not Applicable	Not Applicable	
CAD981696420	98	Safety Kleen of California, Inc. Carson	State Only	Operating Permit	Ins	\$181,654	NA	NA	State Permit with No Contamination	No	No	Not Applicable	Not Applicable	
CAD982446874	99	Safety Kleen of California, Inc. Davis	Standardized	Operating Permit	Ins	\$122,826	NA	NA	Standardized Permit with No Contamination	No	No	Not Applicable	Not Applicable	
CAD982446858	100	Safety Kleen of California, Inc. Santa Maria	Standardized	Operating Permit	Ins	\$68,905	NA	NA	Standardized Permit with No Contamination	No	No	Not Applicable	Not Applicable	
CAD981168107	101	San Diego Gas & Electric Miramar	RCRA	Operating Permit	CG	\$362,392	NA	NA	RCRA Permits with No Contamination.	No	No	Not Applicable	Not Applicable	

**Permitted Facilities with Corrective Action
Financial Assurance Update
July 8, 2016**

EPA ID Number	No.	Facility Name	Regulatory Status	Permit Type	Closure Financial Assurance Mechanism Type	Closure Amount	Post-Closure Financial Assurance Mechanism Type	Post-Closure Amount	Facility Status	Is There Known Contamination?	Is Financial Assurance for Corrective Action Required?	What is the Financial Assurance Corrective Action Amount	Corrective Action Financial Assurance Mechanism Type	Corrective Action Financial Assurance Notes
CAD980636682	102	San Diego Gas & Electric San Diego	Standardized	Operating Permit	CG	\$839,661	NA	NA	Standardized Permit, Corrective Action has been Implemented	Yes	Yes	\$291,591	CG	
CAD000630921	103	Southern California Edison Company San Onofre Nuclear Generating Station	RCRA	Operating Permit	FT	\$6,624,657	NA	NA	RCRA Permits with No Contamination.	No	No	Not Applicable	Not Applicable	
CAD981422017	104	Southern California Gas Co Los Angeles	RCRA	Operating Permit	CG	\$1,008,118	NA	NA	RCRA Permits with No Contamination.	No	No	Not Applicable	Not Applicable	
CAT000625137	105	Southern California Gas Co Pico Rivera	RCRA	Operating Permit	CG	\$2,673,082	NA	NA	RCRA Permits with No Contamination.	No	No	Not Applicable	Not Applicable	
CAD050746775	106	Square D Company	RCRA	Post Closure Permit	NA	NA	LOC	\$900,000	RCRA Permit, Corrective Action has been Implemented	Yes*	No, Contamination Removed, See Note	Not Required	Not Required	Corrective Action has been implemented with a No Further Action Determination; Contamination has been removed; Cleanup completed.
CAD077227049	107	Tesoro Carson Refinery	RCRA	Post Closure Permit	NA	NA	CG	\$29,636,000	RCRA Permit, Referred to Other Agency	Yes	No, Referred to RWQCB, See Note	RWQCB Jurisdiction	RWQCB Jurisdiction	Referred RWQCB (10/30/1997).
CAD041520644	108	Tesoro Refining and Marketing Company Los Angeles Refinery	RCRA	Post Closure Permit	NA	NA	CG	\$2,030,000	RCRA Permit, Referred to Other Agency	Yes	No, Referred to RWQCB, See Note	RWQCB Jurisdiction	RWQCB Jurisdiction	Referred to RWQCB (10/30/1997).
CAD000072751	109	Tesoro Golden Eagle Refinery Martinez	RCRA	Post Closure Permit	NA	NA	CG	\$2,285,280	RCRA Permit, Referred to Other Agency	Yes	No, Referred to RWQCB, See Note	RWQCB Jurisdiction	RWQCB Jurisdiction	Referred to RWQCB (9/23/1997).
CAD008383127	110	TFX Aviation, Inc.	RCRA	Post Closure Permit	NA	NA	Ins	\$5,771,832	RCRA Permit, Corrective Action has been Implemented	Yes	Yes	\$5,771,832	In Post-closure FA	
CAD097465132	111	TP Industrial, Inc.	RCRA	Post Closure Permit	NA	NA	Ins	\$4,700,000	RCRA Permit, Under Investigation, Has Post-Closure Financial Assurance	Yes	Yes	\$4,700,000	In Post-closure FA	
CA5570024575	112	Travis Air Force Base	RCRA	Operating Permit	Exempt	Exempt	Exempt	Exempt	RCRA Permit, exempt From Financial Assurance	Yes	No, Exempt, See Note	Exempt	Exempt	Department of Defense (DOD), by law, is exempt from Financial Assurance Requirements.
CAD009150194	113	USS-POSCO Industries	RCRA	Post Closure Permit	NA	NA	LOC	\$279,404	RCRA Permit, Corrective Action has been Implemented with Financial Assurance	Yes	Yes	\$7,574,273	LOC / Ins	
CAD008302903	114	Veolia ES Technical Solutions, LLC Azusa	RCRA	Operating Permit	SB/P	\$4,656,545	NA	NA	RCRA Permit, Under Investigation, Will be Evaluated for Up-front Financial Assurance for Corrective Action	Yes	No, Under Investigation, FA will be Required After Remedy Selection, See Note	Not Applicable	Not Applicable	Financial assurance is required when the final remedy is selected. We will require financial assurance at that time.
CAT080014079	115	Veolia ES Technical Solutions, LLC Richmond	RCRA	Operating Permit	SB/P	\$780,599	NA	NA	RCRA Permits with No Contamination.	No	No	Not Applicable	Not Applicable	
CAD041844002	116	West County Landfill, Inc.	RCRA	Post Closure Permit	NA	NA	LOC	\$31,197,586	RCRA Permit, Under Investigation, Has Post-Closure Financial Assurance	Yes	Yes	\$31,197,586	In Post-closure FA	
CAD980888598	117	WIT Sales and Refining	Standardized	Operating Permit	CD	\$52,074	NA	NA	Standardized Permit with No Contamination	No	No	Not Applicable	Not Applicable	
CAL000102751	118	World Oil - San Joaquin, LLC	Standardized	Operating Permit	LOC	\$156,531	NA	NA	Standardized Permit with No Contamination	No	No	Not Applicable	Not Applicable	