



Matthew Rodriguez
Secretary for
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Department of Toxic Substances Control

Barbara A. Lee, Director
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Edmund G. Brown Jr.
Governor

December 4, 2015

Mr. David Thaete
EHS Manager
Phibro-Tech, Inc.
8851 Dice Road
Santa Fe Springs, California 90670

DTSC APPROVAL OF POND 1 CLOSURE PLAN, WITH CONDITIONS, PHIBRO-TECH INC., 8851 DICE ROAD, SANTA FE SPRINGS, EPA IDENTIFICATION NUMBER: CAD 008488025

Dear Mr. Thaete:

The Department of Toxic Substances Control (DTSC) received December 3, 2015, the revised Pond 1 Closure Plan titled "Phibro-Tech, Inc., CAD 008 488 025, Santa Fe Springs, California, TSD Facility -- Pond 1 Closure Plan, September 2015, (With Updated Appendices B (figures) and G (November 30, 2015))", (the Closure Plan). The Closure Plan describes activities required to close Pond 1 and related equipment at the Phibro-Tech, Inc. (PTI), facility located at 8851 Dice Road, Santa Fe Springs, California (the Facility). The Closure Plan was revised in response to the DTSC Notice of Deficiency (NOD) dated May 22, 2015, as well as subsequent communications, including DTSC's July 29, 2015 letter regarding the requirement to include closure activities necessary to close Tanks W1, W2, W3, and W4, and related equipment, including Filter Press #2.

The Closure Plan is hereby approved for public review and comment, subject to the following conditions:

1. PTI must comply with the Closure Performance Standards set forth in California Code of Regulations, title 22 Section 66265.111(c)¹ for closure of tanks W-3 and W-4 authorized under a variance and for closure of the surface impoundment Pond 1 authorized under interim status, but which ceased operation as a surface impoundment in July 1985, including, but not limited to the closure requirements in sections:

¹ Unless otherwise indicated, all references to DTSC regulations will be to title 22 of the California Code of Regulations.

- a. 66265.197 Closure and Post-Closure Care of Tank Systems,
 - b. 66265.228 Closure and Post-Closure Care of Surface Impoundments, for Pond 1, and, if waste is left in place,
 - c. 66265.310 Closure and Post-Closure Care of Landfills.
2. PTI must comply with the standards in Section 66265.114 Disposal or Decontamination of Equipment, Structures, and Soil for closure of equipment authorized under variance such as the filter press.
 3. PTI must comply with the standards in Section 66264.197 Closure and Post-Closure Care of Tank Systems, for Tanks W-1 and W-2.
 4. Table 4-1 Target Cleanup Levels is modified as follows: If multiple values for a particular constituent are shown in the table, the lowest value will apply.
 5. The Closure activities described in Section 5 apply to Tanks W-1 through W-4, the filter press, and ancillary equipment.
 6. Any "additional in situ remediation design" as referenced in Section 5.11 Phase 2 Soil Excavation, will be subject to DTSC review, revision and approval prior to implementation.
 7. Any design for a final closure cover as described in Section 15.1.1 must be submitted by PTI to DTSC for review, revision and approval prior to implementation.
 8. Within 30 days of the date of final approval, submit design plans and specifications that include:
 - a. A legal survey with: one foot contour intervals, spot elevations, the existing Pond 1 layout, site features, and proposed excavation area. Include the coordinates for the existing Pond 1 and Tanks W1, W2, W3, and W4, filter presses and related equipment.
 - b. As built drawings for Pond 1, and Tank systems W1, W2, W3, and W4, including Piping and Instrument Diagrams showing all above and underground piping and conduits and pumps and miscellaneous equipment such as filter presses.
 - c. Demolition Plans and Specifications for disposal and decontamination of equipment, structures and soil in accordance with 22 CCR 66265.114.
 - d. Excavation Plans and Specifications with cross sections showing historical boring locations, the extent of contamination, excavation location and dimensions and a shoring and trenching plan based on site specific soil conditions and in accordance with 22 CCR 66265.114.
 - e. Backfill specifications and quality control testing requirements for the back fill activities described in Section 15.1.1, which must include the following: The pit will be backfilled *in 8 inch lifts* to within three feet of grade level using clean select fill material. The backfill soil will be selected to provide

required bearing capacity and will be compacted *to 95% relative compaction*.

- f. Project Implementation Schedule Gantt Chart in MS Project or similar.
- 9. PTI must demonstrate Financial Assurance for the cost estimate specified in the Closure Plan within 60 days of final approval of the Closure Plan.
- 10. Appendix F POND 1 AREA SUBSURFACE REMEDIATION WORK PLAN, Section 2.2 Injection, prior to implementation of soil injections, PTI must submit:
 - a. The soil injection work plan to DTSC for review, revision and approval;
 - b. The Waste Discharge Requirements (WDRs) approved by the RWQCB at least 7 days prior to conducting soil injections.

DTSC will provide the public with an opportunity to review and comment on the Pond 1 Closure Plan and the conditions outlined in this letter. DTSC will be preparing a public notice announcing that the Pond 1 Closure Plan and the conditions outlined in this letter will be made available for public review and that DTSC will be accepting public comments. The public notice date is currently scheduled for December 15, 2015. The public comment period is currently scheduled to extend from December 15, 2015 to February 15, 2015. After considering and responding to public comments DTSC will decide to either approve the Pond 1 closure plan, approve it with changes, or other alternatives.

If you have any questions, please contact Stephen Baxter at (818) 717-6695, or e-mail at stephen.baxter@dtsc.ca.gov.

Sincerely,



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