

- March 08, 2010 -

NOTICE OF EXEMPTION

To: Office of Planning and Research
State Clearinghouse
P.O. Box 3044, 1400 Tenth Street, Room 212
Sacramento, CA 95812-3044

From: Department of Toxic Substances Control
Treatment and Storage Team
9211 Oakdale Ave
Chatsworth, CA 91311

Project Title: Post-Closure Permit Renewal for Ducommun AeroStructures El Mirage Facility

Project Location: 4001 El Mirage Road, El Mirage, California

County: San Bernardino County

Project Description:

The Department of Toxic Substances Control (DTSC) is proposing to issue (renew) a post-closure permit to Ducommun AeroStructures El Mirage Facility for the continued monitoring and post-closure care of a closed regulated unit. The regulated unit is a percolation pond and surface impoundment that was closed as a single regulated unit in 1992. As part of the closure, sludge remaining in the surface impoundment was stabilized, solidified, and placed back into the surface impoundment before a multi-layered landfill cap was constructed over both the closed surface impoundment and closed percolation pond. DTSC previously issued a post-closure permit for this regulated unit in November 1995. The renewal of the post-closure permit would allow Ducommun to continue maintaining the regulated unit and performing environmental monitoring (primarily groundwater monitoring).

The renewal permit will have changes to the monitoring program, post-closure cost estimate, and other administrative changes. No additional waste shall be added to or taken from the regulated unit. No additional changes are proposed to the structure of the regulated unit.

The previous permit was issued to the former facility owner and operator Aerochem Inc. The renewed permit would be issued to the new facility owner/operator Ducommun AeroStructures. Additional changes to the permit include the names and contact information for facility contacts.

Regulations require the owner and operator to estimate the cost of postclosure care as if provided by a third party. The postclosure cost estimate is placed in the application and financial assurance for this amount is provided by the owner/operator. The postclosure cost estimate has been recalculated and increased. The new postclosure cost estimate is reflected in the renewal permit.

Facility Description:

The Ducommun AeroStructures El Mirage Facility (Facility) sits on 120 acres within the El Mirage Valley, about 2 miles south of the El Mirage Dry Lake, at the intersection of Sheep Creek Road and El Mirage Road. The Facility is located in the community of El Mirage, an unincorporated area of San Bernardino County. Prior to 1967 this property was vacant land.

The Andalite Inc. purchased the vacant property in 1967. Aerochem Inc. purchased the operations in 1978. Ownership passed to Ducommun AeroStructures in January 2001.

Ducommun and previous property owners operated a chemical milling operation on the property. Corrosive chemicals are used to etch metal parts to specifications. A corrosive wastewater is produced with either a very low pH (acidic) or high pH (alkaline), and containing various dissolved metals.

Description of the Regulated Unit:

Around 1967, Andalite constructed a 2.25 acre, unlined percolation pond used to receive the wastewater from the operations. In 1978, Aerochem discontinued use of the percolation pond when it bought the operations. Subsequently, Aerochem constructed a 0.75 acre lined surface impoundment in 1980 located inside the percolation pond. Aerochem ceased discharging into the surface impoundment in 1987 and closed both the percolation pond and the surface impoundment as a single, closed regulated unit.

At the time of closure, the surface impoundment contained approximately 1,500 cubic yards (approx 2,000 tons) of waste sediment and sludge. This material had a high pH (alkaline) and high metal content. The remaining waste sludge was stabilized and solidified using various chelating and solidification materials. The resulting solid material was placed back into the lined surface impoundment. A single landfill cap was constructed that covered the waste material, surface impoundment and percolation pond. The landfill cap consisted of a fill material to grade, then a clay barrier liner, a 6-mil plastic liner, a sand/gravel drainage layer, and a vegetative layer on top. The vegetative layer is seeded with a grass (red brome). The resulting regulated unit is a raised mound with a square base, large flat top and steep angled sides. The base is approximately 370 feet by 370 feet, and the flat top is approximately 10 feet above the surrounding grade.

Aerochem submitted an As-Build Closure Report and Certification to DTSC in November 1991, and submitted additional closure information in May 1992. DTSC approved the Closure Certification in June 1992. DTSC issued a post closure permit to Aerochem in November 1995, with an effective date of January 9, 1996, and an expiration date of January 9, 2006.

Name of Public Agency Approving Project: Department of Toxic Substances Control

Name of Person or Agency Carrying Out Project: Ducommun AeroStructures

Exemption Status: (check one)

- Ministerial [PRC, Sec. 21080(b)(1); CCR, Sec. 15268]
- Declared Emergency [PRC, Sec. 21080(b)(3); CCR, Sec.15269(a)]
- Emergency Project [PRC, Sec. 21080(b)(4); CCR, Sec.15269(b)(c)]
- Categorical Exemption: [State type and section number]
- Statutory Exemptions: [State code section number]
- General Rule [CCR, Sec. 15061(b)(3)]

Exemption Title: Title 14, California Code of Regulations, Section 15061 (b) (3) [General Rule] - No possibility of significant effect on the environment.

Reasons Why Project is Exempt:

- 1) The renewal of the postclosure permit is for an existing regulated unit, already closed, with an engineered cover already constructed from the previous postclosure permit. The renewal of the postclosure permit will continue monitoring and care of the regulated unit.
- 2) The regulated unit is closed. No additional waste or materials will be added or deleted from the regulated unit. Materials closed within the unit will not be altered.
- 3) No additional construction or destruction of the regulated unit is proposed.
- 4) Improvements are proposed for the monitoring program. Improvements in the monitoring program will not create environmental impacts.
- 5) Additional monitoring requirements utilize existing wells. No additional wells are to be installed for monitoring the regulated unit.
- 5) Changes to the facility name and contact information are ministerial.
- 6) Changes with the estimated postclosure care cost are ministerial.
- 7) Extension of the post-closure care period allows for continued monitoring and care of the regulated unit without creating any environmental impacts.
- 8) Renewal of the post-closure permit will not change or impact the on-going investigation and/or remediation of the groundwater under the Corrective Action Program.

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March 8, 2010

Branch Chief Signature

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