



Department of Toxic Substances Control



Linda S. Adams
Secretary for
Environmental Protection

Maureen F. Gorsen, Director
9211 Oakdale Avenue
Chatsworth, CA 91311



Arnold Schwarzenegger
Governor

April 14, 2008

Certified Mail #7006 2760 0002 9342 9153
Return Receipt Requested

Mr. Tom Meade
Environmental Health & Safety Division
Raytheon Systems Company
75 Coromar Drive
Goleta, California 93117

CONDITIONAL APPROVAL FOR CLASS 2 PERMIT MODIFICATION REQUEST FOR CLOSURE PLAN FOR RCRA-EQUIVALENT PERMITTED UNITS AT RAYTHEON SYSTEMS COMPANY HAZARDOUS WASTE STORAGE FACILITY, A.K.A. SANTA BARBARA RESEARCH CENTER HAZARDOUS WASTE STORAGE FACILITY (SBRC-GOLETA), 75 COROMAR DRIVE, GOLETA, CALIFORNIA – U.S. EPA ID NO CAD 028 260 297

Dear Mr. Meade:

The Department of Toxic Substances Control (DTSC) has completed its review of the proposed Class 2 permit modification requested on May 27, 2005 and revised on October 19, 2007 by Raytheon Systems Company (Raytheon) for its Closure Plan. In accordance with the California Code of Regulations, title 22, section 66270.42, Raytheon sent a public notice of the proposed modification to the Closure Plan to all persons on the facility's mailing list and to the relevant appropriate entities of state and local government on October 19, 2007. The notification was also published in the Goleta Valley Voice newspaper on October 19, 2007. Pursuant to the California Code of Regulations, title 22, section 66270.42, DTSC hereby approves the October 2007 modified Closure Plan subject to conditions concerning the December 2007 Field Sampling and Analysis Plan (FSAP) enumerated in Attachment A.

Under the California Code of Regulations, title 22, section 66271.14, this action constitutes a permit decision which will become effective on May 16, 2008, unless the permit decision is appealed. Please refer to the attached Notice of Conditional Approval of the Class 2 Permit Modification Request.

In its role as Lead Agency under the provisions of the California Environmental Quality Act (CEQA), DTSC has determined that this project activity (i.e., the conditional Approval of the Class 2 Permit Modification Request) will not have potential for a significant effect on the environment. Therefore, DTSC prepared a CEQA Notice of Exemption for this project activity. The CEQA Notice of Exemption will be filed with the State Clearinghouse, Governor's Office of Planning and Research.

Mr. Tom Meade
April 14, 2008
Page 2 of 3

The public was provided with a 60-day comment period, from October 22, 2007 through December 21, 2007 to comment on the modification request. A public meeting was held on November 13, 2007 by Raytheon at the Goleta Valley Community Center to allow the public to comment on the modification request. No member of the public attended this meeting. Only one comment was received by DTSC from the public during the comment period. The enclosed Response to Comments was prepared and sent to the commenter and the public who requested a copy.

If you have any questions or concerns regarding this letter, please contact Jess Villamayor, at (818) 717-6601.

Sincerely,

//original signed by//

Philip B. Chandler, R. Geophys.
Brownfields and Environmental Restoration Program

Enclosures

cc: Mr. Scott Pringle, Ph.D.
Director of Technical Services
Integrated Environmental Services (IES)
22932 El Toro Road
Lake Forest, CA 92630

Ms. Cheryl Nelson
U.S. EPA, Region IX
75 Hawthorne Street
San Francisco, California 94105

Mr. Guenther Moskat, Chief
Planning and Environmental Analysis Section
Department of Toxic Substances Control
1001 I Street
P.O. Box 806
Sacramento, California 95812-0806

Ms. Bridget Fitzsenry
Office of Scientific and Program Data Analysis
Department of Toxic Substances Control
1001 I Street
P.O. Box 806
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Mr. Tom Meade
April 14, 2008
Page 3 of 3

Ms. Florence Gharibian
Enforcement and Emergency Response Program
Department of Toxic Substances Control
9211 Oakdale Avenue
Chatsworth, California 91311

Mr. Mohinder Sandhu, P.E.
Permit Appeals
Department of Toxic Substances Control
1001 I Street
P.O. Box 806
Sacramento, California 95812-0806

Mr. Jess Villamayor
Brownfields and Environmental Restoration Program
Department of Toxic Substances Control
9211 Oakdale Avenue
Chatsworth, California 91311

ATTACHMENT A

APPROVAL CONDITIONS FOR FIELD SAMPLING AND ANALYSIS PLAN DATED DECEMBER 2007 RAYTHEON SYSTEMS COMPANY-GOLETA

SECTION 1.1 DOCUMENT PURPOSE

The principal constituents-of-concern (COCs) are those chemical cited in Tables 2, 3, and 4 of the October 2007 Closure Plan.

SECTION 2.0 FIELD SAMPLING PLAN

The soil gas sampling shall be completed before soil matrix sampling is initiated.

SECTION 2.1.2 SOIL GAS SAMPLING

Within ten (10) days prior to start up of field work, either EarthTech or Integrated Environmental Services, Inc. shall provide a description of, and then implement an appropriate leak detection test protocol for the installed probes to be used for collecting soil gas samples for VOC analysis.

SECTION 2.1.3 DIRECT PUSH BORINGS

Within ten (10) days prior to start up of field work, either EarthTech or Integrated Environmental Services, Inc. shall provide a description of, and then implement a field extraction protocol, comparable to U.S. EPA Method 5035, for the soil matrix samples collected for VOC analysis. EarthTech may not use the Encore™ sampler, as proposed, for a sample container for EPA Method 8260B samples to be submitted in to the laboratory. It may use the Encore™ sampler to "sub-sample" the material collected in the drive sleeves, but must use the methanol and sodium bisulfate field preservation methods of U.S. EPA Method 5035.

Within ten (10) days prior to start up of field work, either EarthTech or Integrated Environmental Services, Inc. shall provide a description of, and then implement a field logging protocol for the soil matrix borings. EarthTech shall continuously log the shallow borings for lithology and other significant characteristics. Continuous logging does not mean examining a single .5 foot section of core every 5 feet in depth.

SECTION 2.1.4 SOIL SAMPLING

Background

Within ten (10) days prior to start up of field work, either EarthTech or Integrated Environmental Services, Inc. shall provide additional information on the background

sampling. Background may not be established by analyzing multiple samples from the same boring. Separate borings are required. Samples should be obtained below the zone of normal surficial disturbance. The materials from the boring need to be examined, but 5-foot below ground surface is generally sufficient. In general, at least 12 individual samples are appropriate to develop background statistics, but the number of proposed samples and the rationale for that number should be provided

Earth Tech field staff may make field adjustments of proposed borings with DTSC field staff concurrence. DTSC recognizes that access and overhead considerations may be significant considerations, but reserves the right to indicate in any given adjustment instance that the samples may not be considered representative of the purpose for the original target location.

Hazardous Waste Storage Area

Within ten (10) days prior to start up of field work, either EarthTech or Integrated Environmental Services, Inc. shall provide a list of the metals and other constituents to be analyzed for in background and at the hazardous waste management units (HWMUs). For example, tellurium is cited in paragraph 4, p. 1-1, but is then missing in paragraph 8, p. 2-3, and in paragraph 1, p. 2-4. The list needs to address all of the COCs listed in the tables of the closure plan or provide a rationale as to why not.

Within ten (10) days prior to start up of field work, either EarthTech or Integrated Environmental Services, Inc. shall acknowledge that soil matrix samples will be obtained at 1-foot below the slabs, paving or containments in addition to the three samples proposed from 5 through 15 feet bgs. Samples need to be obtained based on observations of the materials in the borings (soil or lithologic contacts, staining, etc.) where such is indicated. A 5-foot interval is just a default where nothing is observable. The boring locations shall be selected on the basis of any observable cracking/cold joint staining/etching situation. Any concrete or paving cores shall be examined and logged for evidence of throughgoing pathways.

Within ten (10) days prior to start up of field work, either EarthTech or Integrated Environmental Services, Inc. shall acknowledge that borings need to be emplaced and samples obtained at 1-foot and 5-foot outside adjacent to but below the sumps in the containment.

Within ten (10) days prior to start up of field work, either EarthTech or Integrated Environmental Services, Inc. shall acknowledge that the specific locations will be selected on the basis of any observable cracking/cold joint/potential pathway/staining situation. The asphalt or concrete paving cores must be examined for evidence of throughgoing cracks. The 5-foot samples may be archived and a decision made about analysis.

Silver Reclamation System

Within ten (10) days prior to start up of field work, either EarthTech or Integrated Environmental Services, Inc. shall acknowledge that borings will be emplaced and samples obtained at 1-foot as well as 5-foot, 10-foot, and 15-foot bgs outside adjacent to that portion of the building in which the silver reclamation units were formerly located.

SECTION 2.1.7 CONCRETE CHIP SAMPLING

Hazardous Waste Storage Area

The concrete chip samples shall be obtained from specific locations selected on the basis of any observable cracking/cold joint/staining/etching situation.

Within ten (10) days prior to start up of field work, either EarthTech or Integrated Environmental Services, Inc. shall provide a description of, and then implement a field extraction protocol, comparable to U.S. EPA Method 5035, for the concrete samples collected for VOC analysis. DTSC prefers that samples obtained for analysis of volatile organic compounds (VOCs) be preserved by the sodium bisulfate and methanol methods. The approach proposed by could result in significant losses of VOCs. For example, quickly breaking the pieces and placing them into a jar which contains a known amount of methanol will reduce such losses. DTSC's Environmental Chemistry Laboratory also suggests collecting and analyzing a soil sample for moisture content so that weight of water content can be accurately taken into consideration in calculation of sample results. The protocol should be provided to DTSC for review and approval before initiation of concrete sampling.

SECTION 2.1.8 RINSEATE SAMPLING

The October 2007 Closure Plan discussed the amount of waste to be generated from implementation of the plan as being 9,030 gallons (approximately equivalent to 164 drums). The FSAP discusses investigation-derived wastes (IDWs) under Section 2.1.1 but does not elaborate on how this volume of material will be handled, whether with drums or "Baker" tanks. Provisions for designating temporary storage and the rinseate sampling protocols shall be provided to DTSC at least ten (10) days prior to initiation of field work.



Linda S. Adams
Secretary for
Environmental Protection



Department of Toxic Substances Control

Maureen F. Gorsen, Director
9211 Oakdale Avenue
Chatsworth, CA 91311



Arnold Schwarzenegger
Governor

April 14, 2008

To: Interested Parties

NOTICE OF CONDITIONAL APPROVAL OF CLASS 2 PERMIT MODIFICATION REQUEST FOR THE CLOSURE PLAN, RAYTHEON SYSTEMS COMPANY FACILITY, 75 COROMAR DRIVE, GOLETA, CALIFORNIA, U.S. EPA. ID. NO. CAD 028 260 297

The Department of Toxic Substances Control (DTSC) has conditionally approved a Class 2 Permit Modification Request dated May 27, 2005, and revised on October 19, 2007, from the Raytheon Systems Company (Raytheon) facility located in the City of Goleta, County of Santa Barbara, California. The Class 2 Permit Modification Request is for the revision of the Closure Plan for the Hazardous Waste Management Facility. DTSC's approval is pursuant to California Code of Regulations, title 22, section 66270.42.

The Hazardous Waste Management Facility operated under a Hazardous Waste Facility Permit for the storage and treatment of hazardous waste. The revised Closure Plan updates a previously approved Closure Plan dated June 28, 1985. Raytheon intends to close the hazardous waste management units (HWMUs) to background levels for naturally occurring constituents and risk-based standards for non-naturally occurring constituents.

A sixty (60)-day public comment period for the Class 2 Permit Modification Request was held from October 22, 2007 through December 21, 2007. Raytheon public noticed the Class 2 Permit Modification Request in the Goleta Valley Voice, a newspaper of general circulation, printed and published weekly in the County of Santa Barbara. The notice was also sent to all persons on the facility mailing list. A public meeting was held by Raytheon on November 13, 2007 at the Goleta Valley Community Center. DTSC received one comment letter from a member of the public at the end of the public comment period.

In its role as Lead Agency under the provisions of the California Environmental Quality Act (CEQA), DTSC has determined that this project activity (i.e., the Conditional Approval of the Class 2 Permit Modification Request) will not have potential for a significant effect on the environment. A CEQA Notice of Exemption will be filed with the State Clearinghouse, Governor's Office of Planning and Research.

The decision to conditionally approve this Class 2 Permit Modification Request may be appealed in accordance with the California Code of Regulations, title 22, section 66271.18. These regulations provide that any person may petition the Department for review of any permit condition which has been changed or added from the permit modification request. In addition, any person who filed comments during the public comment period or participated in the public hearing may petition the Department to review any condition of the permit modification. The petition must include a statement of the reasons supporting the request for review, including a

demonstration that any issues being raised were raised during the comment period or were not reasonably ascertainable at the time of the public comment period. When appropriate, the petition must show that the condition in question is based on:

- 1) a finding of fact or conclusion of law which is clearly erroneous; or
- 2) an exercise of discretion or an important policy consideration which DTSC should review

A petition must be submitted to DTSC requesting a review of the permit decision within a 30-day appeal period beginning on April 17, 2008, and ending on May 16, 2008.

A petition must be postmarked no later than May 16, 2008, and must be submitted to:

Mr. Watson Gin, P.E.
Deputy Director
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

A copy of the petition shall be sent to:

Mr. Steve Lavinger
Brownfields and Environmental Restoration Program
Department of Toxic Substances Control
9211 Oakdale Avenue
Chatsworth, California 91311

Copies of the revised Closure plan and CEQA Notice of Exemption are available for review at:

The Local Librarian
Santa Barbara Public Library System
Goleta Valley Branch Library
500 North Fairview Avenue
Goleta, California 93117

These documents are also available at the DSTC website:

[www.dtsc.ca.gov/Hazardous Waste/Projects/Raytheon-Goleta](http://www.dtsc.ca.gov/Hazardous%20Waste/Projects/Raytheon-Goleta)

Copies of the revised Closure Plan and Notice of Exemption are available for your review in the DTSC File Room at 9211 Oakdale Avenue, Chatsworth, California 91311.

If you have any questions concerning the approval of the permit modification request, please contact Mr. Jess Villamayor, DTSC Project Manager, at (818) 717-6601.

RESPONSE TO COMMENTS

FOR

CLASS 2 PERMIT MODIFICATION FOR REVISION OF CLOSURE PLAN
FOR RCRA-EQUIVALENT PERMITTED UNITS AT RAYTHEON SYSTEMS COMPANY
HAZARDOUS WASTE STORAGE FACILITY, AKA. SANTA BARBARA RESEARCH CENTER
HAZARDOUS WASTE STORAGE FACILITY (SBRC-GOLETA)
75 COROMAR DRIVE, GOLETA CALIFORNIA
EPA ID NO. CAD 028 260 297

INTRODUCTION

Raytheon Systems Company (Raytheon) submitted a permit modification request on May 27, 2005 (revised on October 19, 2007) to the Department of Toxic Substances Control (DTSC) to modify its Closure Plan for hazardous waste management units (HWMUs). These HWMUs had formerly been used to manage hazardous waste under a RCRA-equivalent permit at its facility located at 75 Coromar Drive, Goleta in Santa Barbara County. On October 19, 2007, RSC issued a public notice on the permit modification request and held a public meeting on November 13, 2007. The public comment period ended on December 21, 2007.

During the public comment period, DTSC received comments from one member of the public which has been included in its entirety.

PUBLIC COMMENTS			
	Commenter	Comment	Response
Comment to DTSC dated November 16, 2007			
LD-1	Lydia J. Benedict	As a resident living within proximity to this facility, I am, of course, concerned about hazardous waste. Yes I am interested in the comments how the evaluation and clean up will affect us. Working facilities that began decades ago, now surrounded by housing neighborhoods can always impact the residents for years. Thank you for the update.	The comment is noted. The Department of Toxic Substances Control (DTSC) evaluated the potential impacts of implementing the modified closure plan for the hazardous waste management units. The modified plan requires the removal of the hazardous waste, decontamination of the units and confirmation sampling to ensure that the units have been cleaned to a level that doesn't pose a risk to public health and the environment. The evaluation did not identify potential significant impacts because the closure activities are limited to the hazardous waste storage area which will undergo a rigorous field sampling investigation. Air monitoring will be performed during closure activities and there are no residential areas within 1,000 feet of the site.
LD-2		I am unable to make the 11-13 mtg-any in Dec.?	The facility held only one public meeting on November 13, 2007 as required by regulations.



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Arnold Schwarzenegger
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April 14, 2008

Librarian
Santa Barbara Public Library System
Goleta Valley Branch Library
500 North Fairview Avenue
Goleta, California 93117

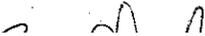
GOVERNMENT INFORMATION REPOSITORY: MODIFICATION TO HAZARDOUS WASTE FACILITY CLOSURE PLAN FOR THE RAYTHEON SYSTEMS FACILITY, 75 COROMAR DRIVE, GOLETA, CALIFORNIA (EPA ID NO. CAD 028 260 297)

Dear Librarian:

The Department of Toxic Substances Control (DTSC) requests that you place for public review the enclosed copy of the Hazardous Waste Facility Closure Plan Modification Package with the existing Draft Public Notice Package and other related documents for the Raytheon Systems Facility (Raytheon) located at 75 Coromar Drive, City of Goleta, Santa Barbara County, California. DTSC has also issued a California Environmental Quality Act (CEQA) Notice of Exemption (NOE) for this project. Enclosed are copies of DTSC's decision package. Please place these documents with the public notice package information for the Raytheon Facility.

At a minimum, please make these documents available to the public as part of the information repository for the facility through May 16, 2008.

If you have any questions, please call Mr. Jess Villamayor at (818) 717-6601. Before you discard these documents, please contact Mr. Villamayor or the undersigned at (818) 717-6608 for disposition.

Sincerely, 

//original signed by//

Philip B. Chandler, R. Geophys.
Brownfields and Environmental Restoration Program

Enclosures

cc: Jess Villamayor
Brownfields and Environmental Restoration Program
Department of Toxic Substances Control
9211 Oakdale Avenue
Chatsworth, California 91311