



*California Environmental Protection Agency  
Department of Toxic Substances Control*

**HAZARDOUS WASTE FACILITY  
POSTCLOSURE PERMIT**

Permit Number: 05-SAC-007

Facility Name:

Telair International  
3303 Old Conejo Road  
Newbury Park, California 91320

Owner Name:

The Tally Corporation  
Telair International  
155 South Limerick Road  
Limerick, Pennsylvania 19468

Operator Name:

Telair International  
4175 Guardian Street  
Simi Valley, California 93063

Facility EPA ID No.: CAD008383127

Effective Date:

Expiration Date:

Permit Modification History: Renewal Permit

Previous permit No. 92-011-PC-001 that  
expired on December 24, 2002

Pursuant to section 25200 of the California Health and Safety Code, this Resource Conservation and Recovery Act (RCRA) equivalent Hazardous Waste Facility Postclosure Permit is hereby issued to Telair International. Issuance of this Permit, which consists of 12 pages, is subject to all terms and conditions set forth herein.

\_\_\_\_\_  
James M. Pappas, P.E.,  
Chief, Northern California Permitting  
and Corrective Action Branch  
Hazardous Waste Management Program

Date: \_\_\_\_\_

Table of Contents

<b>PART I. DEFINITIONS</b>	<b>3</b>
<b>PART II. DESCRIPTION OF THE FACILITY AND OWNERSHIP</b>	<b>4</b>
1. OWNER	4
2. OPERATOR	4
3. LOCATION	4
4. DESCRIPTION	4
5. FACILITY SIZE AND TYPE FOR FEES	5
<b>PART III. GENERAL CONDITIONS</b>	<b>6</b>
1. PERMIT APPLICATION DOCUMENTS	6
2. EFFECT OF PERMIT	6
3. COMPLIANCE WITH CALIFORNIA ENVIRONMENTAL QUALITY ACT	7
4. ENVIRONMENTAL MONITORING	7
7. CONDITIONS APPLICABLE TO ALL PERMITS	8
8. MODIFICATIONS	8
<b>PART IV. PERMITTED UNITS AND ACTIVITIES</b>	<b>8</b>
<b>PART V. SPECIAL CONDITIONS</b>	<b>9</b>
<b>PART VI. CORRECTIVE ACTION</b>	<b>9</b>
1. POTENTIAL OR IMMEDIATE THREATS/NEWLY IDENTIFIED RELEASES/	10
2. SAMPLING AND ACCESS	10

## **PART I. DEFINITIONS**

All terms used in this Permit shall have the same meaning as those terms have in the California Health and Safety Code, Division 20, Chapter 6.5 and Title 22, California Code of Regulations, Division 4.5, unless expressly provided otherwise by this Permit.

1. "DTSC" as used in this Permit means the California Department of Toxic Substances Control.
2. "Permittee" as used in this Permit means the Owner and Operator.
3. "HSC" as used in this Permit means the Health and Safety Code.
4. "Cal. Code of Regs." as used in this Permit means the California Code of Regulations.
5. "Approved Application" as used in this Permit means the Part A and Part B portions of the permit application described in Part III.1 of this Permit.
6. Unless explicitly stated otherwise, all references to items in this Permit shall refer only to items occurring within the same part.

**DRAFT**

## **PART II. DESCRIPTION OF THE FACILITY AND OWNERSHIP**

### **1. OWNER**

The Facility owner is The Tally Corporation, Telair International, 155 South Limerick Road, Limerick, Pennsylvania 19468, (hereafter “Owner”).

### **2. OPERATOR**

The Site operator is Telair International, 4175 Guardian Street, Simi Valley, California 93063 (hereafter “Operator”).

### **3. LOCATION**

The Telair International Site is located at 3303 Old Conejo Road, Newbury Park, California. Newbury Park is part of the municipality of Thousand Oaks which is located in Ventura County. The Site is south of the U.S. 101 freeway and northwest of Wendy Drive. The Facility is shown on the location Map, which is the same as Figure 1 of the Part A portion of the Approved Application (DTSC Attachment 1).

The Site is located on two parcels, Ventura County Assessor’s Parcel Numbers 6680012150 (+/- 12.85 acres). The configuration of the Site is shown on the attached Panoche Parcel Map, DTSC Attachments 2.

### **4. DESCRIPTION**

The Site occupies approximately 12.85 acres and was used for manufacturing civilian and military aircraft components between 1956 and 1989. During the manufacturing process the facility generated hazardous wastes that included metals, cyanide, chlorinated solvents, and waste oils. Soil and groundwater at the site were impacted from the on-site waste disposal practices that included a leach field and two evaporation ponds.

As part of the facility shut down the on-site surface impoundment was removed and approximately 3,000 cubic yards of underlying soil was removed and disposed off-site. The area was backfilled to grade. In 1989, an interim groundwater extraction and treatment system was installed to control groundwater contaminated with chlorinated solvents and chromium IV. In 1998, additional impacted soil was removed from the leach field area and a soil vapor extraction system was installed to remove the remaining chlorinated solvents in the vadose zone. In late 2003, the remedial goals of the soil vapor extraction system were achieved and DTSC certified completion of that part of the remedy in May 2004. Site soils have been remediated to industrial/commercial standards and the site will require land use restrictions into the foreseeable future. The groundwater remedy is ongoing and is expected to continue throughout the period of this permit.

U.S. EPA issued a Statement of Basis for Groundwater Remediation in September 1993. DTSC issued a final Statement of Basis for Soil Remedy in April 1999. The groundwater treatment plant is covered under Permit by Rule is not part of this permit.

#### 5. FACILITY SIZE AND TYPE FOR FEES

The Facility is categorized as a medium postclosure Facility for purposes of HSC, section 25205.19. For the purpose of HSC, section 25205.4.

DRAFT

### **PART III. GENERAL CONDITIONS**

#### **1. PERMIT APPLICATION DOCUMENTS**

The RCRA Subtitle C Site Identification Form, Revised RCRA Hazardous Waste Part A Permit Application, signed January 13, 2002 by Mr. Steven K. Chance, Vice President and General Counsel for Telair International, Postclosure Permit Application, dated December 18, 2002 (Part B Permit Application) and Response to Notice of Deficiency dated June 11, 2004, consisting of two volumes dated 2002 and one volumes dated 2004, are hereby approved and made a part of this Permit by reference (hereafter "Approved Application"). Included in the Approved Application are the Water Quality Sampling and Analysis Plan (SAP), prepared by ENSR, dated November 18, 2002, revised April 23, 2004.

#### **2. EFFECT OF PERMIT**

(a) The Permittee shall comply with the provisions of the California Health and Safety Code, and Division 4.5 of Title 22, California Code of Regulations (Title 22, Cal. Code Regs.). The issuance of this Permit by DTSC does not release the Permittee from any liability or duty imposed by federal or state statutes or regulations or local ordinances, except the obligation to obtain this Permit. The Permittee shall obtain the permits required by other governmental agencies, including but not limited to, the applicable land use planning, zoning, hazardous waste, air quality, water quality, and solid waste management laws for the construction and/or operation of the postclosure facility.

(b) The Permittee is permitted to monitor and maintain the postclosure Facility in accordance with the conditions of this Permit and the Approved Application. Any treatment or storage of hazardous wastes not specifically authorized in this Permit or described in the Approved Application is strictly prohibited.

(c) Compliance with the terms of this Permit does not constitute a defense to any action brought under any other law governing protection of public health or the environment, including, but not limited to, one brought for any imminent and substantial endangerment to human health or the environment.

(d) DTSC's issuance of this Permit does not prevent DTSC from adopting or amending regulations that impose additional or more stringent requirements than those in existence at the time this Permit is issued and does not prevent the enforcement of these requirements against the Permittee. Failure to comply with any term or condition set forth in this Permit in the time or manner specified herein will subject the Permittee to possible enforcement action including but not limited to penalties pursuant to HSC section 25187.

(f) In addition, failure to submit any information required in connection with this Permit, or falsification and/or misrepresentation of any submitted information, is grounds for revocation of this Permit (Title 22, Cal. Code of Regs., section 66270.43).

(g) In case of conflicts between the Approved Application and this Permit, the Permit conditions take precedence.

(h) This Permit includes and incorporates by reference any conditions of waste discharge requirements issued to the Facility by the State Water Resources Control Board or the California Regional Water Quality Control Board, Los Angeles Region, and any conditions imposed pursuant to section 13227 of the Water Code.

### 3. COMPLIANCE WITH CALIFORNIA ENVIRONMENTAL QUALITY ACT

A Notice of Exemption has been prepared in accordance with the requirements of Public Resources Code section 21000 et seq. and the California Environmental Quality Act Guidelines, which are codified in Title 14, Cal. Code of Regs., section 15070 et seq.

### 4. ENVIRONMENTAL MONITORING

(a) For the purpose of Title 22, Cal. Code of Regs., section 66264.91(b), the elements of the Groundwater Monitoring and Response Program for the Telair Facility are those described in the approved Water Quality Sampling and Analysis Plan (SAP), which is part of the Approved Application.

(b) For the purpose of Title 22, Cal. Code of Regs., section 66264.92, the Water Quality Protection Standard for the Telair Facility is described in Section 2 of the approved SAP.

(c) For the purpose of Title 22, Cal. Code of Regs., section 66264.93, the Constituents of Concern for the Telair Facility are described in Section 2.1 of the approved SAP.

(d) For the purpose of Title 22, Cal. Code of Regs., section 66264.94, the Concentration Limits for the Telair Facility are described in Section 2.1 of the approved SAP. Such Concentration Limits may change over time in accordance with statistical and other procedures set forth in the approved SAP.

(e) For the purpose of Title 22, Cal. Code of Regs., section 66264.95, the Monitoring Points and Points of Compliance for each regulated unit at the Telair Facility are described in Section 2.3 of the approved SAP.

(f) For the purpose of Title 22, Cal. Code of Regs., section 66264.96 the Compliance Period for each regulated unit at the IT Panoche Facility is described in Section 2.4 of the approved SAP.

(g) For the purpose of Title 22, Cal. Code of Regs., section 66270.31, the monitoring, recording, and reporting program for the Telair Facility is described in Section 6 of the approved SAP.

## 5. CONDITIONS APPLICABLE TO ALL PERMITS

Title 22, Cal. Code of Regs., section 66270.30, Conditions Applicable to All Permits, is incorporated by this reference.

## 6. MODIFICATIONS

- (a) The Permittee must request and obtain a permit modification to revise any portion of this Permit. To request such a revision, the Permittee must comply with the procedures for permit modifications set forth in Title 22, Cal. Code Regs., section 66270.42.
- (b) If at any time DTSC determines that modification of any part of this Permit is necessary, DTSC may initiate a modification in accordance with the procedures in Title 22, Cal. Code Regs., section 66270.41.

## **PART IV. PERMITTED UNITS AND ACTIVITIES**

For the purpose of Title 22, Cal. Code of Regs., section 66270.1(c) and other similar, unit specific regulatory requirements, the Telair Facility has one Hazardous Waste Management Units. This closed and non-operational unit is described in detail in the Approved Application:

1. The Former Surface Impoundment.



**PART V. SPECIAL CONDITIONS**

None

**PART VI. CORRECTIVE ACTION**

**1. 1. TELAIR GROUNDWATER – ONGOING CORRECTIVE ACTION**

Permittee shall implement the corrective measures described in the DTSC Final Permit Decision and Response to Comments, dated November 24, 1992, and the US EPA Final Decision and Response to Comments dated September 30, 1993. The specific measures that shall be implemented include:

**a. Task 1 Water Quality Compliance Monitoring**

The Permittee shall continue to operate and maintain a groundwater monitoring system as defined in CCR Title 22, Chapter 14, Article 6 section 66264.90 to 66264.100 and described in the Water Quality Sampling and Analysis Plan included in the permit application.

**b. Task 2 Hydraulic Containment of the Impacted Groundwater Plume**

The Permittee shall continue to operate and maintain a groundwater extraction and treatment system or other approved system capable of hydraulically containing the contaminant plume. The goal of this corrective action is to 1) prevent the plume from further migration, 2) reduce the mass of hazardous constituents within the plume and, 3) if possible, reduce the aerial extent of the impacted plume until the groundwater meets the established water quality protection standard. An analysis has been completed of the TCE and chromium concentrations within the plume since treatment was initiated in 1989. Much of the chromium has been removed, and the extent of the chromium impacts above the water quality protection standard (50 ug/l) has been reduced by approximately two thirds. The extent of the TCE plume above the clean up goal (5 ug/l) has not changed significantly despite a significant volume of TCE being removed from the subsurface. Evaluations of clean-up at other similar sites have shown that TCE is very difficult to remove from the subsurface. The containment system is, therefore, assumed to operate throughout the postclosure period.

**c. Task 3 Reporting**

An annual Groundwater Monitoring Report will be submitted March 1 of each year. The Annual Report will contain tables of the historic data as well as describing the specific monitoring activities that were conducted between January and December of the preceding year. The report will include graphical and statistical trend analysis of the groundwater monitoring data. The report will evaluate the effectiveness of the monitoring and containment systems and make recommendations for modifications when appropriate. The report will be signed by a California Registered Geologist or Professional Engineer.

A semi-annual progress report will be submitted March 1 and August 15 of each year and will include a description of the corrective measures activities conducted during the reporting period; summaries of data collected during the reporting period, summaries of contacts with the public during the reporting

period, projected work for the next reporting period and copies of laboratory data not included in other reports provided to the DTSC.

**d. Task 4 Discharge or Disposal of Treated Groundwater**

At present the treated groundwater is discharged under NPDES permit .CA0059609 which expires on June 10, 2008. As specified in the permit, monthly, quarterly and annual samples are collected of the effluent water. Quarterly influent samples are also collected and analyzed. Quarterly and annual reports are provided to the RWQCB with copies being sent to the DTSC and EPA. Discharge limits have been set at or below the California Primary Drinking Water Standards.

**e. Task 5 Maintenance of a Land Use Restriction**

A land use covenant and restriction has been developed as part of the permit renewal process. Land use is restricted to commercial or industrial uses. Compliance with the land use restrictions will be accomplished through administrative, reporting, and procedural controls.

**2. POTENTIAL OR IMMEDIATE THREATS/NEWLY IDENTIFIED RELEASES/  
NEWLY IDENTIFIED SWMUs**

(a) In the event the Permittee identifies an immediate or potential threat to human health and/or the environment, discovers new releases of hazardous waste and/or hazardous constituents, or discovers new Solid Waste Management Units (SWMUs) not previously identified, the Permittee shall notify DTSC orally within 24 hours of discovery and notify DTSC in writing within ten (10) days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment. Newly identified hazardous constituents discovered during routine groundwater sampling shall be reported in accordance with the reporting provisions of the approved SAP.

(b) DTSC may require the Permittee to investigate, mitigate and/or take other applicable action to address any immediate or potential threats to human health and/or the environment, SWMUs, or newly identified releases of hazardous waste and/or hazardous constituents. Corrective action shall be carried out under either a Corrective Action Consent Agreement or Unilateral Corrective Action Order pursuant to HSC, section 25187.

**3. SAMPLING AND ACCESS**

**(a) Sampling**

(1) The Permittee shall provide confirmatory samples to DTSC within the time requested by DTSC to determine if there is a threat to human health and/or the environment. The sampling shall be done in accordance with guidance that DTSC supplies to the Permittee.

(2) The Permittee shall notify DTSC in writing at least fourteen (14) days prior to beginning any confirmatory sampling requested by DTSC. If the Permittee believes it must commence emergency confirmatory sampling without delay, the Permittee may seek emergency telephone authorization from DTSC's Land Disposal Branch Chief or, if unavailable, his/her designee to commence such activities immediately. At the request of DTSC, the Permittee shall provide or allow DTSC or its authorized representative to take split or duplicate samples of all samples collected by the Permittee pursuant to this Part of this Permit.

(3) The Permittee shall submit to DTSC upon request the results of all sampling and/or tests or other data generated by its employees, divisions, agents, consultants or contractors pursuant to this Permit.

(4) Notwithstanding any other provisions of this Permit, DTSC retains all information gathering and inspection authority rights including enforcement actions related thereto, under HSC and any other applicable state or federal statutes or regulations.

(b) Access

(1) DTSC, its contractors, employees, agents, and/or any U.S. EPA representatives are authorized to enter and freely move about the Facility pursuant to the entire Permit for the purposes of: interviewing Facility personnel and contractors; inspecting records, operating logs, and contracts relating to the Facility; reviewing progress of the Permittee in carrying out the terms of this Permit; conducting such test, sampling, or monitoring as DTSC deems necessary; using a camera, sound recording, or other documentary-type equipment; verifying the reports and data submitted to DTSC by the Permittee; or confirming any other aspect of compliance with this Permit and Division 20, Chapter 6.5 of the H&SC. The Permittee shall provide DTSC and its representatives access at all reasonable times to the Permittee's Facility and any other property to which access is required for implementation of any provision of this Permit and any provision of Division 20, Chapter 6.5 of the H&SC and shall allow such persons to inspect and copy all records, files, photographs, documents, including all sampling and monitoring data, that pertain to work undertaken pursuant to this Permit or undertake any other activity necessary to determine compliance with applicable requirements. DTSC acknowledges that the IT Panoche Facility is not manned 24-hours a day. DTSC will provide reasonable notice when requiring access to the site.

(2) To the extent that work being performed pursuant to this Part of this Permit must be done on property not owned or controlled by the Permittee, the Permittee shall use its best efforts to obtain access agreements necessary to complete work required by this Part from the present owner(s) or operator of such property within ninety (90) days of approval of any workplan for which access is required. "Best efforts" as used in this paragraph shall include, at a minimum, a certified letter from the Permittee to the present owner(s) of such property requesting access agreement(s) to allow the Permittee and DTSC and its authorized representatives access to such property and the payment of reasonable sums of money in consideration of granting access. The Permittee shall provide DTSC with a copy of any access agreement(s). In the event that agreements for the access are not obtained within ninety (90) days of approval of any workplan for which access is required, or of the date that the

need for access becomes known to the Permittee, the Permittee shall notify DTSC in writing within fourteen (14) days thereafter regarding both efforts undertaken to obtain access and its failure to obtain such agreements. In the event DTSC obtains access, the Permittee shall undertake approved work on such property.

(3) Nothing in this Permit shall be construed to limit or otherwise affect the Permittee's liability and obligation to perform corrective action including corrective action beyond the Facility boundary, notwithstanding the lack of access. DTSC may determine that additional on-site measures must be taken to address releases beyond the Facility boundary if access to off-site areas cannot be obtained.

(4) Nothing in this Permit shall limit or otherwise affect DTSC's right to access and entry pursuant to any applicable state or federal laws and regulations

DRAFT