

US EPA ARCHIVE DOCUMENT



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX**

75 Hawthorne Street
San Francisco, CA 94105

Via Electronic Mail and U.S. Postal Service Mail
Certified Mail Receipt No. 7008 1830 0002 6279 5257

September 23, 2010

Robert G. Henry
Sr, District Manager
Chemical Waste Management, Inc.
35251 Old Skyline Road
P.O. Box 471
Kettleman City, CA 93239

Re: Polychlorinated Biphenyls (PCBs) – USEPA Conditional Approval Under 40 CFR 761.61(a), Toxic Substances Control Act, Self-Implementing Cleanup of PCBs at PCB Building, Waste Management Kettleman Hills Facility

Dear Mr. Henry:

The U.S. Environmental Protection Agency Region 9 (USEPA or the "Agency") hereby approves with conditions the notification for cleanup of polychlorinated biphenyls (PCBs) titled "*Waste Management Kettleman Hills Facility PCB Building Self-Implementing Cleanup Plan 40 CFR 761.61(a)*," dated August 2010 (the "Notification") and prepared by Chemical Waste Management, Inc. (CWM). The PCB cleanup will be implemented at the PCB Flushing and Storage Building (PCB Building) of the CWM Kettleman Hills Facility (KHF). CWM submitted the Notification pursuant to the Toxic Substances Control Act (TSCA) regulations found at 40 CFR 761.61(a), which establish the disposal and self-implementing cleanup requirements for PCB remediation waste.

CWM must implement the Notification as modified by the conditions incorporated under the enclosed approval. This approval requires CWM to complete the PCB cleanup by October 28, 2010 with certain exceptions that apply.

As discussed during the July 28, 2010 conference call with CWM and the California Department of Toxic Substances Control (DTSC), the Notification submitted by CWM is also designed to meet DTSC's regulatory requirements for corrective action interim measures. CWM must address compliance separately with DTSC on that matter. This approval only addresses CWM's compliance with TSCA and its implementing regulations.

In addition, this approval addresses only the subject cleanup in areas in proximity to the PCB Building. Accordingly, the PCB Cleanup Site encompasses the PCB Building, entire east wall foundation of the PCB Building, PCB Building Ramp, and south and southeast areas in proximity to the PCB Building.

Prior determinations have been made concerning Endangered Species Act (ESA) listed species and designated critical habitat in the vicinity of the CWM KHF. However, in reference to the PCB Building, we have determined the subject cleanup will not affect listed species or designated critical habitat. See

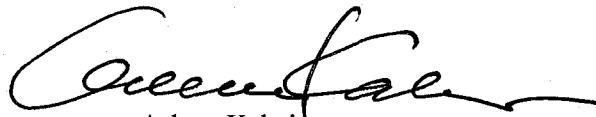
Robert G. Henry
Re: PCB Cleanup CWM KHF PCB Building, USEPA Conditional Approval
Date: September 23, 2010

the attached map depicting the "will not affect" determination area associated with the PCB Building. This "will not affect" determination is premised on the subject cleanup only affecting operational areas at and adjacent to the PCB Building that are free of vegetation, and therefore present no habitat for the Blunt-Nosed Leopard Lizard or the San Joaquin Kit Fox, ESA-listed species. For this reason, the Cleanup Site and cleanup activities approved herein are restricted to areas that are clear of vegetation.

USEPA reserves its rights under TSCA to require cleanup of PCBs at the Cleanup Site if new information reveals that PCBs remain at the Cleanup Site and have not been remediated to the approved cleanup levels. USEPA also reserves its rights under TSCA to require cleanup of any PCB contaminated areas adjacent to the Cleanup Site or elsewhere at CWM KHF.

We look forward to working with CWM to facilitate implementation of the approved Notification. Please call Carmen D. Santos at 415.972.3360 if you have any questions concerning this conditional approval.

Sincerely,



Arlene Kabei
Associate Director
Waste Management Division

Enclosure

Cc: Paul Turek, CWM KHF
Ray LeClerk, California DTSC
Susan J. Laney, California DTSC
Erica Giorgi, California DTSC
Peter Bailey, California DTSC
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Letitia Moore, USEPA R9
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Steve Armann, USEPA R9
John Beach, USEPA R9
Carmen Santos, USEPA R9



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

September 23, 2010

**USEPA Conditional Approval for Chemical Waste Management, Kettleman Hills Facility
PCB Storage and Flushing Building
Self-Implementing PCB Cleanup Under 40 CFR 761.61(a)**

"Waste Management Kettleman Hills Facility PCB Building Self Implementing Cleanup Plan . . ."

A. Introduction

The U.S. Environmental Protection Agency Region 9 (USEPA) hereby approves with conditions the "Waste Management Kettleman Hills Facility PCB Building Self Implementing Cleanup Plan 40 CFR §761.61(a)," dated August 2010 (Notification) and prepared by Chemical Waste Management, Inc. (CWM). This approval is in accordance with the Toxic Substances Control Act (TSCA) regulations in 40 CFR 761.61(a), self-implementing cleanup of polychlorinated biphenyls (PCBs). USEPA received the Notification on August 25, 2010 via electronic mail. USEPA and the California Department of Toxic Substances Control (DTSC) reviewed the Notification. The CWM TSCA Notification also is targeted to serve as the Interim Measures Work Plan requested by DTSC on July 28, 2010. However, USEPA's action on the Notification serves only as an approval with conditions pursuant to 40 CFR 761.61(a). DTSC may issue its own approval of the Notification in context to State corrective action requirements for interim measures.

This approval is effective on the date of receipt via electronic mail or U.S. Postal Service Mail, whichever is sooner. Section C below contains the conditions of approval.

The PCB Storage and Flushing Building (PCB Building) is located within the CWM Kettleman Hills Facility (KHF) in Kettleman City, California.

In brief, this approval requires additional characterization of PCB contamination at the Cleanup Site (see Condition C.1) and cleanup of PCBs to the approved cleanup level of 1 mg/kg.

B. CWM-KHF PCB Storage and Flushing Building Notification and Cleanup Plan

The CWM-KHF is a "commercial Class I/II hazardous waste / designated waste treatment, storage, and Disposal facility (TSDF), and Class II/III designated/municipal solid waste (MSW) disposal facility owned and operated by CWM (EPA ID number CAT000646117)." The KHF is permitted to operate under the Resource Conservation and Recovery Act and TSCA. Operations at the PCB Building involve draining and flushing of PCB equipment and storage of associated PCB wastes.

The Notification includes a Cleanup Plan and Attachments 1 through 6. Attachment 5 and 6 are the "Gravel / Concrete / Asphalt Area Characterization and Confirmatory Sampling Plan August 2010" and "Gravel / Concrete / Asphalt Area Health and Safety Plan August 10, 2010" (HSP), respectively. Generally, USEPA does not approve Health and Safety Plans (HSP). However, California DTSC may issue an approval for CWM's HSP.

CWM has already performed limited soil characterization at the Cleanup Site which indicated PCBs are present in soil at 440 mg/kg. CWM is proposing to excavate and remove for disposal contaminated soils within the footprint of the area east of the PCB Building where CWM plans to replace the existing drainage and flushing area for PCB articles and PCB Building Ramp. These areas are part of the Cleanup Site. CWM also proposes to conduct cleanup verification sampling and to fill the excavation.

Through this approval, USEPA has determined that additional characterization is necessary, and has set forth the requirements for such characterization in Conditions C.1, C.2, C.3, C.4.1, C.4.2, C.5, C.7, C.8, C.9, and C.11.

C. USEPA Conditions of Approval

This conditional approval does not relieve CWM from complying with all other applicable federal, state, and local regulations and permits. Departure from the approval conditions without prior written permission from USEPA may result in the commencement of proceedings to revoke this approval, and/or an enforcement action. Nothing in this approval bars USEPA from imposing penalties for violations of this approval or for violations of other applicable TSCA PCB requirements or for activities not covered under this approval.

This approval only applies to the Cleanup Site which is defined in Condition C.1. This approval excludes PCB characterization and cleanup in vegetated areas that might be potential habitat for the San Joaquin Kit Fox (SJKF) and the Blunt-Nosed Leopard Lizard (BNLL). USEPA reserves the right to require additional characterization and/or cleanup of PCBs at the Cleanup Site or elsewhere at KHF.

The TSCA regulations in 40 CFR 761.61(a)(2) and (a)(3) require the Cleanup Site be adequately characterized and allows USEPA to require additional characterization when the proposed characterization is not sufficient. USEPA has determined the "dig and haul" characterization approach proposed by CWM will not adequately characterize the extent of PCB contamination. Therefore, this approval requires the additional characterization be conducted in the areas described in Condition C.2 (PCB characterization, general).

USEPA is hereby approving the entire CWM Notification (except for the HSP) with the conditions established below.

1. PCB Cleanup Site boundaries and "will not affect" determination. The PCB Cleanup Site encompasses the PCB Building, the areas along the entire length of the east wall foundation of the PCB Building, PCB Building Ramp, and south and southeast areas in proximity to the PCB Building. The Cleanup Site excludes vegetative areas considered by USEPA to be potential habitat for the SJKF and BNLL. USEPA has made a "will not affect" determination for the PCB Building and the "will not affect" determination area is depicted in the attached map. The Cleanup Site is within the "will not affect" determination area. See Cover Letter.

2. PCB characterization, general. CWM must fully characterize soils and concrete in the areas described below, as applicable, in accordance with the procedures in 40 CFR Part 761, Subpart N as required in 40 CFR 761.61(a)(2) and 40 CFR 761.123. See Conditions C.3, C.4.1, C.4.2, C.5, C.7, C.8,

C.9, and C.11 below. The cleanup level for PCBs in soils is less than or equal to 1 mg/kg (see Condition C.9).

- a. Entire area east of the PCB Building encompassing the area where CWM proposes to replace the PCB article drainage and flushing area (approximately 35 x 65 ft.),
- b. Area southeast of the PCB Building to where the characterization sampling grid will extend,
- c. Along the entire edge of the east wall foundation of the PCB Building,
- d. Concrete surfaces (via wipe samples) of the PCB Building Ramp,
- e. Around and beneath the concrete PCB Building Ramp, and
- f. Other areas in proximity to the PCB Building where additional characterization (to fully delineate the lateral and vertical extent of PCB contamination) and/or cleanup may be deemed necessary.

3. Additional soil characterization east and southeast of the PCB Building. CWM must lay out the 3 x 3 meter (approximately 10 x 10 ft) grid as required in 40 CFR 761.265(a) and 283(b). As required in 40 CFR 761.283(b)(2) sampling points must extend in all directions from sample CWM-KHF-PCBW7-1 (440 mg/kg PCBs). CWM must collect individual (i.e., discrete) soil samples at each grid point as required in 40 CFR 761.283(b)(3) and not at the center of each 3 x 3 meter grid as described in Section 2.4(a) (Additional Characterization of the Soils Currently Proposed to be Removed) of the Notification and Section 7 in Attachment 5 (Sampling Plan) of the Notification.

Soil characterization samples must be collected and analyzed as required in 40 CFR 761.283(b)(3). CWM must either analyze the soil samples individually or as part of a composite sample. If CWM elects to analyze the individual soil characterization samples as part of a composite, CWM must adjust the analytical results for the composite samples by multiplying the analysis result for the composite by the number of discrete samples in the composite for comparison to the cleanup level. Soil samples must be collected at 0 to 3 inches and 3 to 4 feet depth at each sampling point in the sampling grid.

The 3 x 3 meter grids coinciding with the southeast and east boundary of the area to be cleaned up must extend (and not be reduced to 1.5 meters) beyond these boundaries to ensure the Cleanup Site is properly characterized before cleanup.¹

Deliverables for Condition C.3. Within 10 days after the date of this approval, CWM must submit the replacement and supplemental figures and topographic maps requested below. Refer to Condition C.6 also.

- CWM must submit figures replacing all the figures in Attachments 1 through 4 of the Notification reflective of the changes to the Notification established in Condition C.3. The

¹ CWM states in Section 2.4(a) of the Notification that due to grid size some grids extend beyond the location proposed for soil characterization and the size of the grid will be reduced at those locations to keep the grid within the proposed characterization area. However, USEPA believes the Cleanup Site would not be adequately characterized following CWM's approach in Section 2.4(a) and therefore it is requiring that the grids be the size required by 40 CFR 761.265(a). Further, Section 3(a)(2) (Concrete) of the Site Cleanup Plan states the 14 x 17 ft section of the PCB article drainage and flushing area has surface cracks. If PCB spills occurred on this cracked surface, the extent of any lateral migration is unknown. Therefore, full characterization is necessary to determine the extent of contamination.

details such as the 3 x 3 meter characterization sampling grids and equally spaced sampling points in the grid.

- CWM must submit supplemental figures depicting all remediated soil areas in the immediate vicinity of the PCB Building in relation to the additional soil characterization required in this approval. For already investigated and excavated soil areas where the lateral and vertical extent of contamination was delineated based on composite samples, the figures must clearly identify such areas and depict the composite sample analysis results. These figures in conjunction with the associated available soil sampling data will help determine if investigation or remediation gaps remain that may need to be addressed.
- The topographical maps mentioned in Section 3 of the Notification and which CWM stated would submit at a later date but were never received by USEPA.

3.1 Alternative to Condition C.3. CWM may alternatively remove soils from the area where it proposes to replace the PCB article drainage and flushing area consistent with 40 CFR 761.61(a)(5)(i)(B)(2)(i) provided that CWM still conduct characterization of soils in grids 67, 72, 73,74, 75, 76, 77, 78, 79, and 80 as required in Condition C.3 and C.8 and that cleanup verification sampling is also conducted as required in Condition C.7 and C.8. CWM must still conduct characterization and cleanup verification required in other Conditions of this approval.

4.1 Soil characterization along the entire length of the edge of the east wall foundation of the PCB Building. CWM must propose the sampling strategy, number, and location of discrete samples that it will collect along and under the entire length of the edge of the east wall foundation of the PCB Building to determine if PCB-contaminated soils are present. Upon USEPA's written approval of CWM's proposal, CWM must collect and analyze the samples. USEPA considers those samples as characterization and not as cleanup verification samples. The samples will be collected after excavation to remove PCB-contaminated soils in the area immediately east of the east foundation wall is completed. That excavation will make accessible for the first time the soils beneath and along the edge of the east wall foundation for characterization. CWM must collect the samples following 40 CFR Part 761 Subpart N requirements for site characterization. The samples may not be composited.

The excavation shall remain open until CWM receives soil characterization sample results confirming whether excavation and cleanup verification sampling is necessary under the east wall foundation of the PCB Building and whether Building foundation integrity could be compromised if soil excavation is conducted along and under the east wall foundation. Refer to Condition 11 regarding contingencies for PCB-contaminated soil that may need to remain in place under the PCB Building east wall foundation at levels above 1 mg/kg PCBs. See Condition C4.2 for Deliverables.

The soils by the portion of the east wall foundation behind the PCB Building Ramp must be sampled after the Ramp is demolished and the steps described above followed.

4.2 Soil characterization below the concrete PCB Building Ramp. CWM must propose the sampling strategy, location, and number of initial discrete samples that it will collect to characterize soils under the

concrete PCB Building Ramp.² Upon USEPA's written approval of CWM's proposal, CWM must collect and analyze the samples. USEPA considers those initial samples to be preliminary soil characterization samples and not cleanup verification samples.

CWM must collect the samples following 40 CFR Part 761, Subpart N requirements for site characterization. Upon demolition of the Building Ramp and before any future replacement of the PCB article drainage and flushing area occurs (if approved by DTSC), CWM must collect additional discrete soil samples following 40 CFR Part 761 Subpart N to complete characterization of soils under the Ramp. These additional samples are also to verify the PCB levels in the preliminary soil characterization data for the Ramp. If the soils are contaminated above 1 mg/kg PCBs based on the additional samples collected after Ramp demolition, CWM must excavate, remove, and dispose of the PCB-contaminated soils. CWM must conduct cleanup verification sampling following 40 CFR Part 761, Subpart O requirements to demonstrate it attained the cleanup level for PCBs in the former Ramp location. CWM must complete the characterization, cleanup, and cleanup verification of the area beneath the Ramp within 30 days after demolition of the Ramp.

Deliverables for Conditions C4.1 and C4.2

- Within 10 days after the date of this approval, CWM must provide a figure to scale depicting the area to be sampled along and under the entire edge of the east wall foundation and around and beneath the concrete Ramp. Together with this figure CWM must submit a table summarizing the proposed number and location of the discrete samples to be collected under the east wall foundation and around and beneath the concrete Ramp.
- Within 5 days after demolition of the concrete Ramp in the eastern section of the PCB Building, CWM must submit to USEPA the figures depicting the location of the characterization and cleanup verification samples that will be collected in the former Ramp area. Soil characterization and cleanup verification sampling must be consistent with the requirements of this approval.

5. Additional characterization – PCB Building Ramp concrete surfaces. CWM proposes to collect wipe samples from the concrete Ramp surfaces and if PCBs are detected in the wipe samples at levels equal to or above 10 ug/100 cm², the Ramp will be removed.³ However, it is uncertain when the Ramp will be demolished or if CWM will continue to use the Ramp before it is demolished. Therefore, CWM must conduct the proposed standard wipe tests following 40 CFR 761.123 requirements to determine if the Ramp surface is contaminated with PCBs at levels that would impeded its continued use. These wipe samples must not be composited. If PCBs are present in the Ramp's concrete surfaces at levels equal to or above 10 ug/100 cm², CWM must decontaminate the Ramp surfaces following the requirements in 40 CFR 761.30(p) in order to continue the use of the Ramp until such time when CWM demolishes the Ramp. See also Condition C.4.2.

² CWM plans on demolishing the concrete Ramp if replacement of the PCB article drainage and flushing area is approved by DTSC. Therefore, the Ramp would be demolished regardless of the presence of PCBs on the Ramp's concrete surface or in soils around or under the Ramp.

³ See Footnote 2.

6. Table summarizing all soil characterization samples to be collected. Within 7 days of this approval, CWM must submit a table summarizing all soil characterization samples required in Conditions C.2, C.3, C.4.1, C.4.2, and C.5 that will be collected in the areas subject to this approval. The table must include the location, sample identification number, number and type (discrete or composite) of samples, sample collection depth, and quality control/quality assurance samples that will be collected. The figures requested in Conditions C.3, C.4.1, and C.4.2 must cross reference the sample identification numbers to be included in the table requested in Condition C.6.

7. Notification, Site Cleanup Plan, Section 3 (Schedule and Description of Proposed Cleanup and Disposal Activities). This Condition together with Conditions C.1 through C.6 modifies the Site Cleanup Plan included in the Notification. CWM must follow the characterization and cleanup sequence described below.

- a. Remove and dispose as TSCA waste the gravel, asphalt, and concrete in the areas to be characterized for PCBs.
- b. Conduct the soil and concrete characterization as required in Conditions C.2, C.3, C.4.1, and C.4.2 consistent with 40 CFR Part 761, Subpart N requirements and wipe samples required in Condition C.5 consistent with the requirements in 40 CFR 761.123.
- c. Based on laboratory analysis results for characterization samples, delineate the limits of excavation and excavate PCB-contaminated soils.
- d. Based on the results of standard wipe tests and timing of Ramp demolition determine if Ramp needs to be decontaminated for continued use following 40 CFR 761.30(p) requirements and decontaminate the Ramp if necessary.
- e. Remove PCB-contaminated soils via excavation.
- f. Conduct cleanup verification sampling in accordance with 40 CFR Part 761 Subpart O.
- g. Evaluate the cleanup verification sample analysis results consistent with the requirements in 40 CFR 761.61(a)(6) and 40 CFR Part 761, Subpart O. If composite samples are used for cleanup verification, the analysis results for these samples do not need to be adjusted if characterization was conducted via discrete samples or if composite characterization samples were used, the analysis results for the composite samples were adjusted as described in Condition C.3.
- h. If the cleanup level equal to or below 1 mg/kg PCBs is not attained at each sample location repeat the cleanup as required in 40 CFR 761.61(a)(6) until the cleanup level is met.
- i. Special issues described in Conditions C.4.1, C.4.2, and C.5 must be accounted for when implementing this sequence.

8. Notification, Attachment 5, Gravel/Concrete/Asphalt Area Characterization and Confirmatory Sampling Plan (SP). Conditions C.1 through C.7 and those established below modify the SP.

- a. **Characterization sampling grid.** The characterization sampling described in Section 7 of Attachment 5 is not consistent with 40 CFR Part 761, Subpart N. The 3 x 3 meter sampling grid for site characterization must be designed or applied consistent with the requirements in 40 CFR Part 761, Subpart N and 40 CFR 761.283(b). Soil samples must be collected at each point in the sampling grid (see 40 CFR 761.283(b)(3)) and not as described in the SP or the Cleanup Plan. See Conditions C.3, C.4.1, C.4.2, and C.7 for additional details. If composite samples are collected for site characterization instead of discrete samples, the analysis results for the composite samples must be adjusted as required in Condition C.3 for comparison with cleanup levels.

- b. **Cleanup verification sampling grid.** The sampling grid for cleanup verification is a 1.5 x 1.5 meter grid and must be designed or applied consistent with the requirements in 40 CFR Part 761, Subpart O.
 - c. **Sample quality control.** Within 5 days after the date of this approval submit to USEPA for approval the methodology for collecting duplicate samples for purposes of sampling quality control and include the number of quality control samples that will be collected. See also Condition C.6. USEPA or DTSC may collect split samples.
 - d. **Section 8, Decontamination of Tools and Equipment.** CWM must decontaminate sampling equipment and tools following the self-implementing decontamination procedures in 40 CFR 761.79(c)(2) which include the double wash/rinse procedure in 40 CFR Part 761, Subpart S. In addition, decontamination procedures must be consistent with 40 CFR 761.79(e) (Limitation of exposure and control of releases).
 - e. **Decontamination waste and residues.** CWM must dispose of all decontamination waste and residues in accordance with the requirements in 40 CFR 761.79(g).
 - f. **Extraction and Analytical Methods.** For soil extraction, CWM should utilize the Soxhlet extraction method (USEPA Method 3540C). If necessary, post extraction and pre-analysis sample cleanup (e.g., USEPA Methods 3665A [sulfuric acid], 3620C [florisil column], 3640A [GPC]) procedures should be considered if matrix interferences are suspected that could increase analytical method detection limits and compromise comparisons of analytical results to cleanup levels required in this approval.
 - g. **Excavation backfill.** If replacement of the PCB article drainage and flushing area cannot be done immediately following confirmation of cleanup levels at the Cleanup Site, CWM shall backfill and cap the excavation with a suitable material that will prevent re-contamination of soils with PCBs. This Condition also modifies the Site Cleanup Plan and Notification.
- 9. Approved PCB cleanup level.** Except for any contingencies specified in Condition C.11, CWM must meet the soil cleanup level of less than or equal to 1 mg/kg PCBs at the Cleanup Site. To ensure that residual PCBs do not affect the SJKF or BNLL or their critical habitat, the Cleanup Site shall not include any vegetative area considered as habitat for these species. See Cover Letter.
- 10. Cleanup wastes.** CWM must dispose of all cleanup wastes (e.g., non-liquid cleaning materials, non-porous surfaces, rags, gloves and other personal protective equipment) in accordance with the requirements in 40 CFR 761.61(a)(5)(v).
- 11. Contingencies for PCB contaminated soil that may remain in place.** See Condition C.4.1. If the results of soil characterization samples indicate that soils along and under the edge of the east wall foundation need to be excavated and the Building's structural integrity could be compromised, CWM must cap the contaminated soils. If future construction of the proposed PCB containment area is approved by DTSC, the containment area must meet the requirements for a TSCA cap set forth in 40 CFR 761.61(a)(7). CWM must inspect routinely and maintain the cap in perpetuity in accordance with a USEPA approved cap maintenance and monitoring plan that also includes timely repairs to the cap. The requirements of 40 CFR 761.61(a)(8) also apply to the cap.

12. Completion of PCB cleanup at Cleanup Site. CWM must complete the PCB cleanup at the Cleanup Site by October 28, 2010 except for the area beneath the PCB Building Ramp which should be addressed as required in Condition C.4.2.

13. Recordkeeping. Within 30 days after completing the PCB cleanup, CWM must submit to USEPA a PCB Cleanup Completion Report (aka Interim Measures Completion Report) that meets the requirements of 40 CFR 761.61(a)(9) and 40 CFR 761.125. The Cleanup Report must also meet the Additional PCB Cleanup Reporting Requirements described below.

Additional PCB Cleanup Reporting Requirements – Interim Measures Completion Report

The Completion Report will include field sampling and laboratory analytical procedures, field and sample analysis results, results of the Confirmatory Sampling Plan, a discussion of the potential risk to human health and the environment, and conclusions. Analytical results referenced in Section 2.1 of the Notification as well as characterization and cleanup results generated under this approval must be presented in the Completion Report. Completion maps must be provided showing the excavation and removal limits conducted in August 10, 2010 and thereafter, as well as, locations of samples collected and associated results, dates of sample collection, maps to scale showing north arrows, and legend of sample type. All sampling data must also be tabulated and presented in tables.

13.1 Recordkeeping contingencies. The PCB Cleanup Completion Report will be considered as an Interim Cleanup Report (a) if soils contaminated with PCBs at levels above 1 mg/kg will remain in place along and under the east wall foundation due to the reasons in Conditions C.4.1 and C.11 and/or (b) characterization and cleanup of potentially PCB-contaminated soils under the PCB Building Ramp is not completed by October 28, 2010. If either of these situations occur, CWM will provide a schedule to implement the contingencies in Condition C.11 and the characterization, cleanup, and cleanup verification required in Condition C.4.2.

14. Errata sheet. CWM must submit an errata sheet within 5 days after the date of this approval correcting erroneous information in the Notification and providing the clarifications requested in some of the Conditions of approval.

- The table in Section 2.2 of the Notification is erroneously labeled as “Wipe Sample Results Near Concrete/Asphalt Area.” This table presents results of soil composite samples collected near concrete and asphalt. The same table is included in Attachment 3 with the same error.
- The clarification required in Condition C.3.
- The clarification required in Condition C.8.b.
- Table in Page 14 (Attachment 1) of the Notification, Soil samples CWYS-2 is missing, yet a symbol “2” is noted on the figures. Clarification needed.
- Provide a description of the San Joaquin Valley Air Pollution Control District rules applicable to particulate matter emissions from the project and demonstrate how compliance will be achieved.