AMEC Geomatrix, June 8, 2009, Letter from Hassan Amini, Ph.D., Project Coordinator to DTSC



AMEC Geomatrix

June 8, 2009

Project 9967

Mr. Jose Diaz Department of Toxic Substances Control Site Mitigation Branch 9211 Oakdale Avenue Chatsworth, California 91311

## Re: Request for Deadline Extension for OU2-6 RAP Former Whittaker Bermite Facility, Santa Clarita, CA

Dear Mr. Diaz:

Confirming our discussions of May 22 and June 2, this letter presents Whittaker's formal request to extend the deadline for submitting the Remedial Action Plan (RAP) for Operable Units 2 through 6 of the former Whittaker Bermite site (the site) from May 29, 2009, to August 14, 2009.

As you are aware, the Whittaker team prepared and submitted the second draft of the RAP to the Department of Toxic Substance Control (DTSC) on January 30, 2009. DTSC provided comments on April 10, 2009, and referenced the February 18, 2009, letter from the City of Santa Clarita (City) and raised concern that modifications to the terms and conditions of the Porta Bella Development Plan that was referenced in the City letter would significantly delay cleanup of the site. Based on that concern DTSC requested that the RAP should be revised to remove any reference to the Porta Bella Plan. As requested, the Whittaker team is currently revising the RAP and removing specific references to the Porta Bella Plan. Nonetheless, we wish to maintain the references to the integration of site remediation with potential future development on a conceptual level to allow flexibility for any potential future development.

As we discussed during our telephone conversations on May 22nd and June 2<sup>nd</sup>, 2009, a technical meeting between the DTSC and Whittaker teams will be highly beneficial to discuss application of the selected remedial measures to specific areas referenced in the RAP. To that end, I will contact you to coordinate that meeting. Following our technical meeting and discussions with DTSC, we will make appropriate changes to the text, figures, tables, and appendixes as necessary.

The April 10, 2009, DTSC letter also provided comments related to the Resource Conservation and Recovery Act (RCRA) unit (OU6). DTSC requested a revised "Closure Plan" for the RCRA unit to incorporate pilot and field studies proposed for that area. DTSC anticipates that the revisions to the Closure Plan will trigger Class 2 or 3 modifications to the RCRA Interim Status Hazardous Waste Facility Permit. As I briefed you during our telephone conversations, we are currently reviewing the available closure options for the RCRA unit (i.e., clean closure vs. closure with waste in place). Based on the review of the DTSC comments and our telephone conversations, we understand that modifications to the Closure Plan can be proposed at this time while the pilot and field studies are underway. However, the determination of "clean" vs. "waste in place" closure will need to be made based on the results of the studies as well as an

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assessment of the risks to human health and environment that may be posed by any residual chemicals beneath the RCRA unit. Although we have already started review of this matter, development of modifications to the Closure Plan will require additional time. Therefore, I respectfully request a revised deadline of September 15 for the proposed modifications.

As you are aware, we are making good progress in implementing the work plan for the soil vapor extraction pilot study that has been approved by the DTSC. We have also started the laboratory scale testing portion of our pilot study work plan for Gaseous Electron Donor Injection Technology potentially applicable to deep soil treatment at the site. Meanwhile, we will continue our focus on expediting on-site groundwater containment through implementation of the pilot scale extraction and treatment operation that was approved by DTSC. To that end, we have finished review of the contractors' proposals and have conducted interviews to select a qualified firm. We will make that selection in the next two weeks. In addition, Energy Solutions results of characterization of the depleted uranium (DU) impact in the Areas 57 and 14 and their work plan for DU removal has been finalized and will be submitted to DTSC and the Radiological Health Branch of the California Department of Public Health shortly. In summary, we are making good progress in all areas of compliance with the DTSC order, as I regularly summarize in my monthly project progress summary reports.

Please call me at (949) 642-0245 if you need any additional information. Thank you for your continuous attention and support.

Sincerely, AM⊉C Geomatrix, Inc.

/Hassan Amini, Ph.D. C.HG. Project Coordinator

cc: Eric Lardiere, Whittaker Corp; William Weaver, CDM; Jessica Donovan, ENVIRON; Paul Bergstrom, Knight Piésold; Larry Sievers, EODT; Tim Bricker, Santa Clarita L.L.C.; Megan Trend, Chubb Financial Solutions; Cindy Hunter, MariKay Fish, Julie Diebenow, AlG Insurance; Vitthal Hosangadi, NOREAS; John Carty, Zurich North America; Hal Dash, Cerrell Associates; Jeff Hogan, City of Santa Clarita; Yueh Chuang, CH2M Hill; Kathy Stryker Anderson, US Army Corps of Engineers; Robert DiPrimio, Valencia Water Company; Lynn Takaichi, and Meredith Durant, Kennedy Jenks; David Bacharowski, RWQCB; James Leserman, Castaic Lake Water Agency; Steve Cole, Newhall County Water District; Mauricio Guardado, Santa Clarita Water; Neil Elsey, Avion Holdings LLC; Alisa Lacey, Stinson Morrison Hecker LLP; Jeff O'Keefe, Department of Public Health