

**STATEMENT OF BASIS — PROPOSED APPROVAL  
TOXIC SUBSTANCES CONTROL ACT POLYCHLORINATED BIPHENYLS (PCB)  
COMMERCIAL STORAGE FACILITY AND  
CHEMICAL WASTE LANDFILL  
CHEMICAL WASTE MANAGEMENT, INC. KETTLEMAN HILLS FACILITY**

**APPENDIX C –  
ADMINISTRATIVE RECORD INDEX**

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**Availability of Administrative Record Documents**

Electronic versions of many documents listed in this Administrative Record are available on **[www.regulations.gov](http://www.regulations.gov)** [docket number EPA-R09-RCRA-2019-0088].

Please contact the Kettleman Hills Project Manager for information on how to obtain documents not available on Regulations.gov. Please note that not all Administrative Record documents (or portions of certain documents) are available for public release. Release of documents to the public are governed by applicable confidential business information, copyright, and privacy protection requirements.

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## **I. PROPOSED APPROVAL AND APPENDICES**

- A. “Proposed Approval – Toxic Substances Control Act PCB Commercial Storage Facility and Chemical Waste Landfill, Chemical Waste Management, Inc. Kettleman Hills Facility, Kings County, California, U.S. EPA ID: CAT 000 646 117.” Land, Chemicals & Redevelopment Division, U.S. EPA Region 9. August 27, 2019.
1. “Appendix B – Incorporated Documents – Volume 1”. August 27, 2019.
  2. “Appendix B – Incorporated Documents – Volume 2”. August 27, 2019.
  3. “Appendix B – Incorporated Documents – Volume 3”. August 27, 2019.
  4. “Appendix B – Incorporated Documents – Volume 4”. August 27, 2019.
  5. “Appendix B – Incorporated Documents – Volume 5”. August 27, 2019.
  6. “Appendix B – Incorporated Documents – Volume 6”. August 27, 2019.
  7. “Appendix B – Incorporated Documents – Volume 7”. August 27, 2019.

## **II. STATEMENT OF BASIS, APPENDICES, AND REFERENCES DOCUMENTS**

Note: The Environmental Justice Analysis and reference documents are listed in Section III.

### **A. STATEMENT OF BASIS**

1. “Statement of Basis – Proposed Approval Toxic Substance Control Act Polychlorinated Biphenyls (PCBs) Commercial Storage Facility and Chemical Waste Landfill, Chemical Waste Management, Inc. Kettleman Hills Facility, Kings County, California, U.S. EPA ID: CAT 000 646 117.” Land, Chemicals & Redevelopment Division, U.S. EPA Region 9. August 27, 2019 with Appendices:
  - a. Appendix A – Executive Summary in Spanish
  - b. Appendix B – Public Notices and Fact Sheet (English and Spanish)
  - c. Appendix C – Administrative Record Index
  - d. Appendix D – U.S. EPA TSCA Review Checklists for the Proposed Approval
  - e. Appendix E – Justifications for Use of Omnibus Provisions
  - f. Appendix F – Reporting, Notification, and Submittal Requirements in the Kettleman Hills Facility Proposed TSCA Approval
  - g. Appendix G – Environmental Justice Analysis (See Section III)
  - h. Appendix H – National Historic Preservation Act Determination
  - i. Appendix I – Endangered Species Act Determination
  - j. Appendix J – Clean Air Act Conformity Applicability Analysis



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**B. REFERENCES FOR THE STATEMENT OF BASIS**

1. “Kettleman City Site Investigation Report, Sampling Results Addendum XX.” ACS Associates. October 25, 2010 (Appendix to CalEPA 2010).
2. “PCB Outside Pad Replacement and Cleanup Completion Report Kettleman Hills Facility, Kings County, CA.” Associated Design & Engineering, Inc. January 10, 2011 (revised July 20, 2011).
3. “Addendum to Evaluation of Pre-Sample Purge Methods, Kettleman Hills Facility, Kings Kettleman City, California.” Letter, Bradley A. Loewen and Philip P. Ross, AMEC Geomatrix, Inc. to Paul Turek, Chemical Waste Management, Inc. June 27, 2008.
4. “Second Quarter 2012 Groundwater and Unsaturated Zone Monitoring and Constituents of Concern Report for Class I Waste Management Units, Kettleman Hills Facility, Kings County, CA.” AMEC Environment & Infrastructure, Inc. September 25, 2012.
5. “Revised Site-Specific Groundwater Monitoring Plan Class I Waste Management Units, Kettleman Hills Facility, Kings County, California.” AMEC Environment & Infrastructure, Inc. April 14, 2014.
6. “Fourth Quarter 2016 Monitoring and Constituents of Concern Report for Class I Waste Management Units as Required by DTSC on March 6, 2015, Kettleman Hills Facility, Kings County, CA.” AMEC Environment & Infrastructure, Inc. February 24, 2017.
7. “Toxicological Profile for Polychlorinated Biphenyls (PCBs).” Agency for Toxic Substances and Disease Registry. November 2000.
8. “Investigation of Birth Defects and Community Exposures in Kettleman City, CA.” California Environmental Protection Agency and California Department of Public Health. December 2010 (revised February 24, 2011).
9. “Report to the Office of Environmental Health Hazard Assessment, Kettleman City Air Quality Assessment.” California Air Resources Board, December 2010.
10. “Toxic Substances Control Act Permit Renewal, Kettleman Hills Facility, 35251 Old Skyline Road, Kettleman City, Kings County, California.” Letter, Julianne Polanco, State Historic Preservation Officer, California Office of Historic Preservation to Barbara Gross, U.S. EPA Region 9. October 8, 2018.
11. “TSCA Approval Renewal for Landfills B-18, Chemical Waste Management, Inc. Kettleman Hills Facility CAT 000 646 117.” Letter, Paul E. Turek, Chemical Waste Management, Inc. to Yoshiro Tokiwa, U.S. EPA Region 9. April 1, 1997.
12. “TSCA Approval Renewal for Landfills B-14, B-16 and B-19 and Ancillary Commercial Storage Activities, Chemical Waste Management, Inc. Kettleman Hills Facility CAT 000 646 117.” Letter, Paul E. Turek, Chemical Waste Management, Inc. to Yoshiro Tokiwa, U.S. EPA Region 9. July 1, 1997.
13. “Chemical Waste Management, Inc. – Kettleman Hills Facility Response to TSCA Permit Renewal Information Request #2.” Letter, Paul Turek, Chemical Waste





- Management, Inc. to Paula Bisson, U.S. EPA Region 9. October 11, 1999. With Enclosures.
14. “Chemical Waste Management, Inc. – Kettleman Hills Facility Request for TSCA PCB Coordinated Approval.” Letter, Paul E. Turek, Chemical Waste Management, Inc. to Wayne Nastri, Regional Administrator, U.S. EPA Region 9. October 20, 2003.
  15. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monitoring of Landfill B-16 Lysimeters.” Letter, Paul E. Turek, Chemical Waste Management, Inc. to Max Weintraub, U.S. EPA Region 9. February 13, 2004.
  16. “Chemical Waste Management, Inc., (CWMI)-Kettleman Hills Facility (KHF) CAT 000 646 117 2006 PCB Annual Report.” Letter, Tracy Reddick, CWM to Regional Administrator, U.S. EPA Region 9. June 26, 2007. [REDACTED for posting on regulations.gov]
  17. “Chemical Waste Management, Inc. - Kettleman Hills Facility Response to TSCA Notice of Noncompliance Follow-Up Letter PCB Performance Evaluation Samples - Second Set.” Letter, Paul Turek, Chemical Waste Management, Inc. to Christopher Rollins, U.S. EPA Region 9. February 12, 2008.
  18. “Chemical Waste Management, Inc. Kettleman Hills Facility CAT 000 646 117 Revised 2007 PCB Annual Report.” Letter, Tracy Reddick, CWM to Regional Administrator, U.S. EPA Region 9. August 4, 2008. [REDACTED for posting on regulations.gov]
  19. “Chemical Waste Management, Inc. – Kettleman Hills Facility Request to Modify TSCA PCB Coordinated Approval Request.” Letter, Paul E. Turek, Chemical Waste Management, Inc. to Cheryl Nelson, U.S. EPA Region 9. June 26, 2009.
  20. “Chemical Waste Management, Inc., (CWMI)-Kettleman Hills Facility (KHF) CAT 000 646 117 2008 PCB Annual Report.” Letter, Tracy Reddick, CWM to Regional Administrator, U.S. EPA Region 9. July 15, 2009. [REDACTED for posting on regulations.gov]
  21. “Chemical Waste Management, Inc., (CWMI)-Kettleman Hills Facility (KHF) CAT 000 646 117 2009 PCB Annual Report.” Letter, Tracy Reddick, CWM to Regional Administrator, U.S. EPA Region 9. July 8, 2010. [REDACTED for posting on regulations.gov]
  22. “Chemical Waste Management, Inc., (CWMI)-Kettleman Hills Facility (KHF) CAT 000 646 117 2010 PCB Annual Report.” Letter, Tracy Reddick, CWM to Regional Administrator, U.S. EPA Region 9. July 13, 2011. [REDACTED for posting on regulations.gov]
  23. “Chemical Waste Management, Inc. – Kettleman Hills Facility Re: “Other” Noncompliance Report.” Letter, Paul Turek, Chemical Waste Management, Inc. to Wayne Lorentzen, Department of Toxic Substances Control. May 23, 2012.
  24. “Chemical Waste Management, Inc., (CWMI)-Kettleman Hills Facility (KHF) CAT 000 646 117 2011 PCB Annual Report.” Letter, Tracy Reddick, CWM to Regional



- Administrator, U.S. EPA Region 9. July 6, 2012. [REDACTED for posting on regulations.gov]
25. “Chemical Waste Management, Inc., (CWMI)-Kettleman Hills Facility (KHF) CAT 000 646 117 2012 PCB Annual Report.” Letter, Tracy Reddick, CWM to Regional Administrator, U.S. EPA Region 9. July 8, 2013. [REDACTED for posting on regulations.gov]
26. “Chemical Waste Management, Inc., (CWMI)-Kettleman Hills Facility (KHF) CAT 000 646 117 2013 PCB Annual Report.” Letter, Tracy Reddick, CWM to Regional Administrator, U.S. EPA Region 9. July 9, 2014. [REDACTED for posting on regulations.gov]
27. “Chemical Waste Management, Inc., (CWMI)-Kettleman Hills Facility (KHF) CAT 000 646 117 2014 PCB Annual Report.” Letter, Tracy Reddick, CWM to Regional Administrator, U.S. EPA Region 9. July 8, 2015. [REDACTED for posting on regulations.gov]
28. “Chemical Waste Management, Inc., (CWMI)-Kettleman Hills Facility (KHF) CAT 000 646 117 2015 PCB Annual Report.” Letter, Tracy Reddick, CWM to Regional Administrator, U.S. EPA Region 9. July 20, 2016.
29. “Chemical Waste Management, Inc., (CWMI)-Kettleman Hills Facility (KHF) CAT 000 646 117 2016 PCB Annual Report.” Letter, Tracy Reddick, CWM to Regional Administrator, U.S. EPA Region 9. July 5, 2017.
30. “Chemical Waste Management, Inc. – Kettleman Hills Facility Revised TSCA Permit Renewal Application – Revision 1”. Reyna Verdin, Chemical Waste Management, Inc. to Frances Wicher, U.S. EPA Region 9. July 13, 2017.
31. “TSCA Renewal Application, Chemical Waste Management, Inc. Kettleman Hills Facility.” Revision 1: July 15, 2017.
32. “Hazardous Waste Facility Permit Renewal Application, Operation Plan, Chemical Waste Management, Inc. Kettleman Hills Facility.” Chemical Waste Management, Inc. Revision 3: March 16, 2018. [REDACTED for posting on regulations.gov]
33. “Chemical Waste Management, Inc. – Kettleman Hills Facility Revised TSCA Permit Renewal Application – Revision 2”. Reyna Verdin, Chemical Waste Management, Inc. to Frances Wicher, U.S. EPA Region 9. April 19, 2018.
34. “TSCA Permit Renewal Application, Chemical Waste Management, Kettleman Hills Facility.” Revision 2: April 20, 2018.
35. “First Notice of Deficiency for TSCA Permit Renewal Application Chemical Waste Management, Inc. – Kettleman Hills Facility EPA ID No. CAT 000646117” (responses). Chemical Waste Management, Inc. April 20, 2018.
36. “Chemical Waste Management, Inc., (CWMI)-Kettleman Hills Facility (KHF) CAT 000 646 117 2017 PCB Annual Report.” Letter, Tracy Reddick, CWM to Regional Administrator, U.S. EPA Region 9. July 9, 2018.



37. “TSCA Permit Renewal Application, Chemical Waste Management, Kettleman Hills Facility.” Chemical Waste Management, Inc., Revision 3: October 1, 2018.
38. “TSCA Operation Plan, Landfill B-18 Phases I, II, and III; PCB Building and Outside Containment Area.” Chemical Waste Management, Inc., Revision 3: October 1, 2018.
39. “Chemical Waste Management, Inc. – Kettleman Hills Facility Revised TSCA Permit Renewal Application – Revision 3.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Frances Wicher, U.S. EPA Region 9. October 2, 2018.
40. “Notifications correspondence from KHF to EPA-IX for PCB detections in groundwater monitoring results and leachate analytic results for TSCA-regulated units from 1992 – 2018. Compiled by Chemical Waste Management, Inc. October 2, 2018.
41. “Chemical Waste Management, Inc. – Kettleman Hills Facility, 22 CCR Financial Assurance for Closure & Post-Closure Costs.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Julie Mullins, Department of Toxic Substances Control. December 31, 2018. With Enclosures. [REDACTED for posting on regulations.gov].
42. “CWM-KHF Information Request.” Email, Reyna Verdin, Chemical Waste Management, Inc. to Frances Wicher, U.S. EPA Region 9. July 16, 2019.
43. “Hazardous Waste Facility Permit – Chemical Waste Management, Inc. Kettleman Hills Facility (Permit Number: 02-SAC-03).” Department of Toxic Substances Control. Effective June 16, 2003 (modified May 5, 2005, July 25, 2006, September 21, 2007, and May 21, 2014).
44. “Review of Evaluation of Pre-Sample Purge Methods, Chemical Waste Management, Inc. – Kettleman Hills Facility, Kings county, US environmental Protection Agency ID CAT0006460117.” Ruth Cayabyab, Department of Toxic Substances Control to Paul Turek, Chemical Waste Management, Inc. February 20, 2008.
45. “In the matter of Chemical Waste Management, Inc. Enforcement Order.” Department of Toxic Substances Control. May 20, 2011.
46. “Summary of Violations.” Ignacio R. Dominguez, Department of Toxic Substances Control to Bob Henry, Chemical Waste Management. October 22, 2012. With enclosure: “Summary of Violations.” Department of Toxic Substances Control. October 22, 2012.
47. “California v. Chemical Waste Management, Inc. Complaint for Civil Penalties and Injunctive Relief, Case No. BC503092.” Department of Toxic Substances Control. March 18, 2013.
48. “Revised Site-Specific Ambient Air Monitoring Plan (SSAAMP) for Location of Additional Downwind Monitoring Station and Month-Long PCB Sampling, Chemical Waste Management, Inc., Kettleman Hills Facility, 35251 Old Skyline Road, Kettleman City, Kings County, California 93239, Environmental Protection Agency Identification Number CAT000646117.” Letter, Edward Nieto, Department of Toxic Substances Control to Robert Henry, Chemical Waste Management, Inc. May 11, 2016.
49. “Draft Biological Opinion for Toxic Substances Control Act Permit Application for Chemical Waste Management’s Kettleman Hills Facility (modification and expansion



- of PCB disposal Cell B-18), Kings County, California.” Letter, Susan K. Moore, U.S. Fish and Wildlife Service to Caleb Shaffer, U.S. EPA Region 9. August 15, 2012.
50. “Amendment to the Biological Opinion for Toxic Substances Control Act Permit Application for Chemical Waste Management’s Kettleman Hills Facility (modification and expansion of PCB disposal Cell B-18), Kings County, California.” Letter, Thomas Leeman, U.S. Fish and Wildlife Service to Chip Poalinelli, U.S. EPA Region 9. September 5, 2012.
51. “CWM’s Kettleman Hills Facility Fence Realignment: Changes to Biological Opinion #81420-2012-F-0044-2.” Email, Kevin Aceituno, U.S. Fish and Wildlife Service to John Moody, U.S. EPA Region 9. July 23, 2014.
52. “CWM’s Kettleman Hills Facility Fence Realignment: Changes to Biological Opinion #81420-2012-F-0044-2.” Email, Kevin Aceituno, U.S. Fish and Wildlife Service to John Moody, U.S. EPA Region 9. July 30, 2014.
53. “Kettleman Hills PCB Approval Review.” Letter, Patricia Cole, U.S. Fish and Wildlife Service to Sara Ziff, U.S. EPA Region 9. December 7, 2018.
54. “Recommendation for Decommissioning Sounding Wells, B-14 Waste Management Unit, Kettleman Hills Facility, Kettleman City, California.” Letter, Bradley A. Loewen and Philip P Ross, Geomatrix Consultants, Inc. to Paul Turek, Chemical Waste Management, Inc. January 12, 2006. “Recommendation for Decommissioning Sounding Wells, B-14 Waste Management Unit, Kettleman Hills Facility, Kettleman City, California.” Letter, Bradley A. Loewen and Philip P Ross, Geomatrix Consultants, Inc. to Paul Turek, Chemical Waste Management, Inc. January 12, 2006.
55. “Evaluation of Pre-Sample Purge Methods.” Geomatrix. March 2007.
56. “Site-Specific Groundwater Monitoring Plan, Kettleman Hills Facility, Chemical Waste Management, Inc., Kings County, California.” Geosyntec Consultants. May 2001.
57. “Engineering and Design Report, Landfill B-18, Class 1 Landfill, Phase III Expansion and Final Closure, Kettleman Hills Facility, Kettleman City, California.” Golder Associates, Inc. November 2008, Revised August 2011.
58. “Storm Water Pollution Prevention Plan Chemical Waste Management, Inc. – Kettleman Hills Facility.” Golder Associates, Inc. June 2015 (amended March 2016).
59. “Responses to DTSC Review Comments on the Phase 1 And Phase 2 Construction Quality Assurance (CQA) Reports Spill Isolation and Containment System at the Sampling Platforms and Untarpping Racks Kettleman Hills Facility – Kings County, California.” Letter, Ryan Hillman, Golder Associates, Inc. to Reyna Verdin, Chemical Waste Management, Inc. March 2, 2017.
60. “Closure and Post-Closure Cost Plan, Kettleman Hills Facility, Kings County, California.” Golder Associates, Inc. March 16, 2018.
61. “Closure and Post-Closure Cost Estimates, Kettleman Hills Facility, Kings County, California.” Golder Associates, Inc. March 15, 2018.



62. “Chemical Waste Management Kettleman Hills Facility Permit and Expansion, Kings County.” Letter, Sharaya Souza, Native American Heritage Commission. October 17, 2017.
63. “1994 Topographical, Meteorological and Airborne Contaminant Characterization at Kettleman Hills Facility.” Rust Environmental & Infrastructure Inc. April 1995 with Appendices.
64. “Order R5-2014-0003 Waste Discharge Requirements for Chemical Waste Management, Inc. Class I/II Waste Management Units Kettleman Hills Facility Kings County.” Central Valley Regional Water Control Board. January 16, 2014.
65. “Monitoring and Reporting Program R5-2014-0003 for Chemical Waste Management, Inc. Class I/II Waste Management Units Kettleman Hills Facility.” California Regional Water Quality Control Board Central Valley Region. January 16, 2014.
66. “Approval for Disposal of PCB Waste.” Letter, Sheila M. Prinderville, Regional Administrator, U.S. EPA Region 9, to Don McCombs, Waste Management, Inc. June 29, 1981.
67. “Approval for Disposal of PCB Landfill.” Letter, Sonia F. Crow, Regional Administrator, U.S. EPA Region 9, to Craig McKenzie, Chemical Waste Management, Inc. February 16, 1983.
68. “Approval to Operate A Chemical Waste Landfill for PCB Disposal (Chemical Waste Management, Inc. Kettleman Facility).” John C. Wise, Acting Regional Administrator, U.S. EPA Region 9. February 22, 1988.
69. “Amendment to the Approvals to Operate a Chemical Waste Landfill for PCB Disposal.” Daniel W. McGovern, Regional Administrator, U.S. EPA Region 9. November 30, 1990.
70. “Amendment to the Approvals to Operate Landfills B-14, B-16, and B-19.” Daniel W. McGovern, Regional Administrator, U.S. EPA Region 9, to Mark Langowski, Chemical Waste Management, Inc. December 3, 1990.
71. “Chemical Waste Management, Inc. Kettleman Hills Facility TSCA Approval to Operate Landfill B-18.” Letter, David P. Howekamp, Director Air and Toxics Division, U.S. EPA Region 9, to Leo Stahlecker, Chemical Waste Management, Inc. May 19, 1992. With enclosure:
  - a. “Approvals to Operate a Chemical Waste Landfill for PCB Disposal.” David P. Howekamp, Director Air and Toxics Division, U.S. EPA Region 9. May 19, 1992.
72. “Approval for a Toxic Substances Control Act PCB Commercial Storage Facility Permittee: Lighting Resources, Inc. 1522 East Victory Street, Suite 4 Phoenix, AZ 85040 EPA ID Number: AZD 983 476 680.” U.S. EPA Region 9. January 23, 2003.
73. “Docket No. TSCA-09-2005-0002 Consent Agreement and Final Order Pursuant to 40 C.F.R. §§ 22.13 and 22.18.” U.S. EPA Region 9. May 3, 2005.



74. “Transmittal of Final Report – ‘Multimedia Compliance Investigation: Phase 1’ Chemical Waste Management, Inc. Kettleman Hills, CA NEIC Project No.: VP0686.” Memorandum, Diana A. Love, Director, NEIC (U.S. EPA) to Christopher Rollins, U.S. EPA Region 9. January 17, 2006.
75. “Multimedia Compliance Investigation: Phase 2 Chemical Waste Management, Inc. Kettleman Hills, CA NEIC Project No.: VP0686E04.” U.S. EPA National Enforcement Investigations Center. April 2007. [REDACTED]
76. “Pilot Survey of Levels of Polychlorinated Dibenzo-p-dioxins, Polychlorinated Dibenzofurans, Polychlorinated Biphenyls, and Mercury in Rural Soils of the United States” EPA/600/R-05/048F. U.S. EPA Region 9. April 2007 (including Appendices).
77. “Notice of Noncompliance for Violations of Toxic Substances Control Act.” Letter, Paula Bisson, U.S. EPA Region 9, to Paul Turek, Chemical Waste Management, Inc. June 26, 2007.
78. “Notice of Noncompliance Follow Up Letter.” Letter, Paula Bisson, U.S. EPA Region 9, to Paul Turek, Chemical Waste Management, Inc. November 28, 2007.
79. “Decommissioning Landfill Unit B-14 Sounding Wells.” Letter, Adrienne Priselac, U.S. EPA to Chemical Waste Management, Inc. August 28, 2008.
80. “Request for Additional Sampling of Air, Soil, and Biota/Vegetation and Analysis for PCB Congeners.” Letter, Cheryl Nelson, U.S. EPA Region 9, to Paul Turek, Chemical Waste Management, Inc. December 2, 2008.
81. “Violations of the Toxic Substances Control Act (“TSCA”). Amy C. Miller, U.S. EPA Region 9, to Paul Turek, Chemical Waste Management, Inc. February 4, 2010.
82. “TSCA Compliance Evaluation Inspection Report, Chemical Waste Management, Inc. February 8-12, 2010.” U.S. EPA Region 9. March 12, 2010.
83. “TSCA Compliance Evaluation Inspection Report, Chemical Waste Management, Inc. June 2, 2010.” U.S. EPA Region 9. July 27, 2010.
84. “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.” Arlene Kabei, U.S. EPA Region 9, to Bob Henry, Chemical Waste Management, Inc. September 23, 2010.
85. “Docket No. TSCA-09-2011-0001 Consent Agreement and Final Order Pursuant to 40 C.F.R. §§ 22.13 and 22.18.” U.S. EPA Region 9. November 29, 2010.
86. “Inspection Report [November 12, 2010], Waste Management, Kettleman Hills Facility.” U.S. EPA, Office of Enforcement and Compliance Assurance. February 5, 2011.
87. “Docket No. RCRA-09-2011-0016 Consent Agreement and Final Order Pursuant to 40 C.F.R. §§ 22.13 and 22.18.” U.S. EPA Region 9. August 23, 2011.
88. “Request for Formal Consultation Under Section 7 of the Endangered Species Act on TSCA Permit Application for Chemical Waste Management Kettleman Hills Facility.”





- Caleb Shaffer, U.S. EPA Region 9, to Thomas Leeman, US Fish and Wildlife Service. September 20, 2011.
89. “Kettleman City Indoor Pesticide Sampling, Status Update.” U.S. EPA Region 9. November 2011.
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#### **C. REFERENCES FOR APPENDIX D – U.S. EPA TSCA APPLICATION REVIEW CHECKLISTS**

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16. Letter, Tom Huetteman, U.S. EPA Region 9, to Robert Henry, CWMI. December 20, 2016.
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18. Letter, Barbara Gross, U.S. EPA Region 9, to Reyna Verdin, Chemical Waste Management, Inc. December 21, 2017. With enclosure:
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3. “Order #EP079000258: CWM Kettleman Hills Facility Project.” Adele Baldwin, California Historical Resources Information System to Max Weintraub, U.S. EPA Region 9. November 23, 2007.
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5. “Compliance with Section 106 of the National Historic Preservation Act for the Renewal and Modification of Toxic Substance Control Act (“TSCA”) Polychlorinated Biphenyls (“PCBs”) B-18 Permit – Kettleman Hills Facility.” Letter, Cheryl Nelson, U.S. EPA Region 9, to Tristan Tozer, State Historian, Office of Historic Preservation. December 21, 2009.
6. “Modification of TSCA PCB B-18 Permit – Kettleman Hills Facility.” Email, Edwin Poalinelli, U.S. EPA Region 9, to Tristan Tozer, State Historian, Office of Historic Preservation. January 11, 2010.
7. “Request for a Sacred Lands File Search and Native American Contacts List for a Proposed “Kettleman Hills Chemical Waste Management – B-18 Expansion Project, under a TSCA Permit to Store and Dispose of Waste Containing PCBs” located in western Kings County, California 2.6 miles west of Interstate 5 where it intersects with State Route 41.” Letter, Dave Singleton, Native American Heritage Commission to Edwin Poalinelli, U.S. EPA Region 9. March 4, 2010. [REDACTED for posting on regulations.gov].





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13. “Memo to Admin Record.” Email, Edwin Poalinelli, U.S. EPA to Edwin Poalinelli. March 18, 2010.
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16. “Landfill B-18 Permit Renewal and Expansion of Chemical Waste Management Kettleman Hills Facility, Kettleman Hills, California.” Letter, Milford Wayne Donaldson, State Historic Preservation Officer to Caleb Shaffer, U.S. EPA Region 9. October 28, 2011.
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19. Letter, Barbara Gross, U.S. EPA Region 9, to Stan Alec, Chairman, Kings River Choinumni Tribe. July 25, 2018.
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**E. REFERENCES FOR APPENDIX I – ENDANGERED SPECIES ACT DETERMINATION**

1. “Request for Formal Consultation Under Section 7 of the Endangered Species Act on TSCA Permit Application for Chemical Waste Management Kettleman Hills Facility.” Letter, Caleb Shaffer, U.S. EPA to Thomas Leeman, U.S. Fish and Wildlife Service. September 20, 2011. With enclosure: “CWM Kettleman Hills Facility, B-18 Landfill Expansion Project, Section 7 Biological Assessment.” Berryman Ecological. July 2011.
2. “Request for Formal Consultation and Receipt of Initiation Package for the Toxic Substances Control Act Permit Application for Chemical Waste Management’s Kettleman Hills Facility Landfill Expansion.” Letter, Daniel Russell, U.S. Fish and Wildlife Service to Caleb Shaffer, U.S. EPA Region 9. December 7, 2011.
3. “Summary of Surface Water Controls for Landfill B-18.” Letter, Robert Henry, Chemical Waste Management, Inc. to Edwin Poalinelli, U.S. EPA Region 9. December 14, 2011.
4. “Chemical Waste Management, Inc. – Kettleman Hills Facility Section 7 Biological Assessment – January 2012 Revision.” Letter, Paul E. Turek, Chemical Waste Management, Inc. to Edwin Poalinelli, U.S. EPA Region 9. January 24, 2012. With enclosure: “CWM Kettleman Hills Facility, B-18 Landfill Expansion Project, Section 7 Biological Assessment.” Berryman Ecological. July 2009. Rev: January 2012.





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65. “Memo #2: Some Consideration of the Reported Health Status of Residents of Kettleman City and Suggestions for Next Activities” Technical Assistance Services for Communities Program. April 14, 2010.
66. “Memo #3: What can be done to help Kettleman City residents now?” Technical Assistance Services for Communities Program. October 4, 2010.



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86. “Polychlorinated Biphenyls (PCBs) – U.S. EPA 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.” Arlene Kabei, U.S. EPA Region 9, to Bob Henry, Chemical Waste Management, Inc. September 23, 2010.
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  - b. Appendices A through O, except D and G (Dispersion Modeling Report)
  - c. Appendix D: Field Notes
  - d. Appendix G: Laboratory Analytical Data
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109. “Quarterly Ambient Air Monitoring Program Data Report April 2011 – June 2011 Chemical Waste Management, Inc. Kettleman Hills Facility (KHF).” Wenck Associates, Inc. September 2011.
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138. “Ambient Air Monitoring Program Quarterly Report April 2018 – June 2018 Chemical Waste Management, Inc. Kettleman Hills Facility (KHF).” Wenck Associates, Inc. September 2018.
139. “Ambient Air Monitoring Program Quarterly Report July 2018 – September 2018 Chemical Waste Management, Inc. Kettleman Hills Facility (KHF).” Wenck Associates, Inc. December 2018.
140. “Air Quality Monitoring at the Kettleman Hills Facility.” Wenck Associates, Inc. April 2019.
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### **C. OTHER DOCUMENTS**

1. “Is There a Toxic Monster in Kettleman City? Why the State of California’s Draft Report and Investigation of Kettleman City Birth Defects are Incomplete, Flawed, and Misleading.” El Pueblo Para El Air y Agua Limpio and GreenAction for Health and Environmental Justice. December 2, 2010.
2. “Kettleman City Community Canvass, Community Forum Kettleman City Library.” Slide Presentation, Public Health Institute. June 2017.
3. “Resources & Contacts. Recursos y Contactos Kettleman City, California.” Public Health Institute. June 27, 2017.
4. “Kettleman City Community Heath Canvass, Final Report.” Presentation, Public Health Institute for Kings County Department of Public Health. June 29, 2017.

## **IV. PUBLIC PARTICIPATION DOCUMENTS**

### **A. 2019 PROPOSED APPROVAL**

1. “U.S. EPA Requests Public Comment on Proposed PCB Permit for Kettleman Hills Facility.” Land, Chemicals and Redevelopment Division, U.S. EPA Region 9. August 27, 2019.
2. “La EPA solicita comentarios publicos sobre el permiso propuesto para realizar operaciones con PCB en la instalación Kettleman Hills.” Land, Chemicals and Redevelopment Division, U.S. EPA Region 9. August 27, 2019.
3. “Kettleman Hills Facility – Proposed PCB Permit; Public Meeting & Hearing.” U.S. EPA Region 9. August 27, 2019.
4. “Instalación Kettleman Hills – Permiso Propuesto de PCB; Reunión Pública y Audiencia.” U.S. EPA Region 9. August 27, 2019.



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**B. HISTORICAL PUBLIC PARTICIPATION DOCUMENTS****1. 2007 Public Hearing**

- a. “U.S. EPA Requests Public Comments on the Draft Permit and Draft Environmental Justice Assessment for the Chemical Waste Management, Inc., Kettleman Hills Facility.” U.S. EPA Region 9. January 2007.
- b. “United States Environmental Protection Agency (EPA) Seeks Public Comment on Draft Permit and Draft Environmental Justice (EJ) Assessment for Chemical Waste Management, Inc. – Kettleman Hills Facility.” U.S. EPA Region 9. January 2007.
- c. “U.S. EPA Requests Public Comments on the Draft Permit and Draft Environmental Justice Assessment for the Chemical Waste Management, Inc., Kettleman Hills Facility.” U.S. EPA Region 9. March 2007.
- d. “U.S. EPA holds public workshop on draft permit and environmental justice assessment for Kettleman Hills landfill.” Media Advisory. U.S. EPA Region 9. March 8, 2007.
- e. “Agenda U.S. EPA (EPA) Workshop and Public Hearing about Draft Permit for PCB Activities at Chemical Waste Management, Inc. – Kettleman Hills Facility and Draft Environmental Justice (EJ) Assessment.” U.S. EPA March 27, 2007. Includes other materials handed out at meeting.
- f. “U.S. EPA Extends Public Comment Period on the Draft Permit and Draft Environmental Justice (EJ) Assessment for Chemical Waste Management, Inc. – Kettleman Hills Facility until June 4, 2007.” U.S. EPA Region 9. May 2007.

**2. 2009/2010 U.S. EPA Meetings**

- a. “United States Environmental Protection Agency (EPA) Chemical Waste Management, Inc. – Kettleman Hills Facility PCB Permit Renewal Update Meeting – February 4, 2009.” Notice. January 2009.
- b. “Kettleman Hills Facility PCB Congener Sampling, March 31-April 1, 2009.” Photos. U.S. EPA Region 9. March-April 2009.
- c. “Possible meeting dates/times on PCB data in Kettleman City.” Email, Cheryl Nelson, U.S. EPA Region 9, to Bradley Angel, Greenaction. November 9, 2009.
- d. “Informe de Campo Sobre Muestras Separadas, Chemical Waste Management, Incorporated, Kettleman Hills, California.” Handout. U.S. EPA Region 9. November 30, 2009.
- e. “PCB Congener Study Preliminary Results Discussion. Agenda.” U.S. EPA Region 9. December 16, 2009. Includes copies of handouts.
- f. “PCB Congener Study Preliminary Results Discussion. Agenda.” U.S. EPA Region 9, December 16, 2009. Includes color copies of handouts.
- g. “EPA Factsheet on PCBs.” U.S. EPA Region 9. September 24, 2010.



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### 3. 2011 U.S. EPA Meeting

- a. “Fact Sheet on United States Environmental Protection Agency’s Compliance Investigation and Enforcement at Chemical Waste Management, Kettleman Hills.” U.S. EPA Region 9. November 2011.
- b. “Kettleman Community Workshop & Meeting. Thursday, November 17<sup>th</sup>.” Department of Toxic Substances Control and U.S. EPA Region 9. November 2011.
- c. “Air, Soil Vapor, Surface Water, and Groundwater Monitoring, Waste Management, Inc. – Kettleman Hills Facility (MAP).” Department of Toxic Substances Control and U.S. EPA Region 9. November 2011.
- d. “Regulación de Aire, Vapor del Suelo, Agua Superficial y Agua Subterránea Waste Management, Inc. – Instalación Kettleman Hills (MAP).” Department of Toxic Substances Control and U.S. EPA Region 9. November 2011.
- e. “Air, Soil Vapor, Surface Water, and Groundwater Monitoring, Waste Management, Inc. – Kettleman Hills Facility.” Department of Toxic Substances Control and U.S. EPA Region 9. November 2011.
- f. “Regulación de Aire, Vapor del Suelo, Agua Superficial y Agua Subterranea Waste Management, Inc. – Instalación Kettleman Hills.” Department of Toxic Substances Control and U.S. EPA Region 9. November 2011.
- g. “Hazardous Waste Permitting – Map, Waste Management, Inc. – Kettleman Hills Facility.” Department of Toxic Substances Control and U.S. EPA Region 9. November 2011.
- h. “Permisos para Desechos Peligrosos – Diagrama, Waste Management, Inc. – Instalación Kettleman Hills.” Department of Toxic Substances Control and U.S. EPA Region 9. November 2011.
- i. “Hazardous Waste Permitting – Activity, Waste Management, Inc. – Kettleman Hills Facility.” Department of Toxic Substances Control and U.S. EPA Region 9. November 2011.
- j. “Permisos para Desechos Peligrosos – Actividades, Waste Management, Inc. – Instalación Kettleman Hills.” Department of Toxic Substances Control and U.S. EPA Region 9. November 2011.
- k. “Enforcement Program, Waste Management, Inc. – Kettleman Hills Facility.” Department of Toxic Substances Control and U.S. EPA Region 9. November 2011.
- l. “Programa de Cumplimiento, Waste Management, Inc. – Instalación Kettleman Hills.” Department of Toxic Substances Control and U.S. EPA Region 9. November 2011.



- m. “Kettleman Hills Facility Permitting Process, Waste Management, Inc. – Kettleman Hills Facility.” Department of Toxic Substances Control and U.S. EPA Region 9. November 2011.
- n. “Instalación Kettleman Hills Proceso de Tramitación de Permisos, Waste Management, Inc. – Instalación Kettleman Hills.” Department of Toxic Substances Control and U.S. EPA Region 9. November 2011.
- o. “Kettleman Hills Facility Permitting Process – Water Board, Waste Management, Inc. – Kettleman Hills Facility.” Department of Toxic Substances Control and U.S. EPA Region 9. November 2011.
- p. “Instalación Kettleman Hills Proceso de Tramitación de Permisos, Waste Management, Inc. – Kettleman Hills Facility.” Department of Toxic Substances Control and U.S. EPA Region 9. November 2011.
- q. “Human Health Risk Assessment at K.H. Facility, Waste Management, Inc. – Kettleman Hills Facility.” Department of Toxic Substances Control and U.S. EPA Region 9. November 2011.
- r. “Evaluación de Riesgos Para la Salud Humana en la Instalación K.H. Waste Management, Inc. – Instalación Kettleman Hills.” Department of Toxic Substances Control and U.S. EPA Region 9. November 2011.
- s. “Critical Distances Affecting Human Health Risk, Waste Management, Inc. – Kettleman Hills Facility.” Department of Toxic Substances Control and U.S. EPA Region 9. November 2011.
- t. “Distancias Críticas Que Afectan los Riesgos Para la Salud Humana, Waste Management, Inc. – Instalación Kettleman Hills.” Department of Toxic Substances Control and U.S. EPA Region 9. November 2011.
- u. “RCRA and TSCA Compliance History of Chemical Waste Management, Inc.” U.S. EPA Region 9. November 2011.
- v. “Historial de Cumplimiento de RSCA y TSCA de Chemical Waste Management, Kettleman Hills.” U.S. EPA Region 9. November 2011.
- w. “Agenda Workshop/Public Meeting Thursday, November 17, 2011.” Department of Toxic Substances Control and U.S. EPA Region 9. November 2011.
- x. “Pesticide Sampling Poster.” U.S. EPA Region 9. November 2011.
- y. “Pesticide Safety Project: Preventing Pesticide Exposure among Women of Childbearing Age in Kettleman City, California.” U.S. EPA Region 9, November 2011.
- z. “Project Summary & Update – Update on Chemical Waste Management – Kettleman Hills Facility PCB Permit Application Project.” U.S. EPA Region 9. November, 2011.
- aa. “Untitled.” Presentation. U.S. EPA Region 9. November 16, 2011.



- bb. “Kettleman City Community Workshop Public Workshop November 17, 2011 (sic) Sign-In sheet.” U.S. EPA Region 9. November 16, 2011. [REDACTED for posting on regulations.gov]
4. Community Fair 2017
- a. “Visit our booth at the Kings County Public Safety Event.” Postcard, Department of Toxic Substances Control and U.S. EPA to Kettleman City post office boxes. October 2017.
  - b. Safety Fair Booth Posters (English). U.S. EPA Region 9. October 2017.
  - c. Safety Fair Booth Posters (Spanish). U.S. EPA Region 9. October 2017.
  - d. Letter, Frances Wicher, U.S. EPA Region 9, to Kettleman City Residents who signed up to receive more information on the Kettleman Hills Project at the October 2017 Safety Fair. November 8, 2017.
5. Public Meeting 2017
- a. “Save the Date! DTSC & USEPA Community Meeting.” Department of Toxic Substances Control and U.S. EPA Region 9. November 2017.
  - b. “How Does the EPA Decision Process Work?” Poster, U.S. EPA Region 9. November 16, 2017 (English & Spanish).
  - c. “What Does the Facility Want to Do?” Poster, U.S. EPA Region 9. November 16, 2017.
  - d. “Qué quiere hacer la instalación?” Poster, U.S. EPA Region 9. November 16, 2017.
  - e. “What Should I Know About PCBs?” Poster, U.S. EPA Region 9. November 16, 2017.
  - f. “Qué debería saber sobre los PCBs?” Poster, U.S. EPA Region 9. November 16, 2017.
  - g. “November 16, 2017 Community Meeting Applications for Chemical Waste Management’s Kettleman Hills Facility (Agenda).” Handout. Department of Toxic Substances Control and U.S. EPA Region 9. November 16, 2017.
  - h. “PCB Application Review Process Under TSCA – Chemical Waste Management – Kettleman Hills Facility.” Presentation, U.S. EPA Region 9. November 16, 2017.
  - i. “Proceso de revisión de la solicitud de PCB bajo la ley TSCA – Chemical Waste Management – Kettleman Hills Facility.” Presentation, U.S. EPA Region 9. November 16, 2017.
6. Community Notice and Community Fair 2018
- a. “Community Update.” Department of Toxic Substances Control. April 2018. (English and Spanish)





- b. “Major Changes Requested in Permit Renewal Application/“Revisión de la aplicación, Comentarios público y Proceso de decisión.” Posters. U.S. EPA Region 9. October 2018.

### C. CWM COMMUNITY MEETINGS

1. “Kettleman Hills Facility – Three Decades of Community Support” Waste Management. January 2012.
2. “Annual Community Meeting Notification” Letter, Robert Henry, Chemical Waste Management, Inc to Chairman, Kings County Board of Supervisors. March 24, 2017.
3. “Kettleman Hills Facility 2016 Groundwater and Unsaturated Zone Annual Summary.” AMEC Foster Wheeler. April 2017.
4. “Resumen Anual 2016 de Las Aguas Subterráneas y Zonas Insaturadas de las Instalaciones de Kettleman Hills.” AMEC Foster Wheeler. April 2017.
5. “Air Quality Monitoring at the Kettleman Hills Facility.” Wenck Associates, Inc. April 2017.
6. “Control de Calidad del Aire en las Instalaciones de Kettleman Hills.” Wenck Associates, Inc. April 2017.
7. “Chemical Waste Management, Inc- Kettleman Hills Facility DTSC Permit Number: 02-SAC-03; DTSC Permit Condition: Part III. General Conditions, Condition 4. (C)” Letter, Robert Henry to Department of Toxic Substances Control, April 18, 2017.
8. “Kettleman Hills Facility 2nd Annual Informational Meeting.” Flyer, Chemical Waste Management, Inc. April 25, 2017.
9. “Instalación de Kettleman Hills 2ª Reunión Informativa Annual.” Flyer, Chemical Waste Management, Inc. April 25, 2017.
10. “Waste Management Kettleman Hills Facility Annual Community Meeting” Presentation.” Waste Management. April 25, 2017.
11. “2nd Annual Community Meeting.” Email, Bob Henry, Chemical Waste Management, Inc. to Frances Wicher, U.S. EPA Region 9. April 29, 2017.
12. “Annual Community Meeting Notification” Letter, Robert Henry, Chemical Waste Management, Inc to Chairman, Kings County Board of Supervisors. March 27, 2018.
13. “Air Quality Monitoring at the Kettleman Hills Facility.” Wenck Associates, Inc. April 2018.
14. “Control de Calidad del Aire en las Instalaciones de Kettleman Hills.” Wenck Associates, Inc. April 2018.
15. “Kettleman Hills Facility 2017 Groundwater and Unsaturated Zone Annual Summary.” AMEC Foster Wheeler. April 2018.
16. “Resumen Anual 2017 de Las Aguas Subterráneas y Zonas Insaturadas de las Instalaciones de Kettleman Hills.” AMEC Foster Wheeler. April 2018.



17. “Kettleman Hills Facility 3rd Annual Informational Meeting.” Flyer, Chemical Waste Management, Inc. April 26, 2018.
18. “Instalación de Kettleman Hills 2ª Reunión Informativa Annual.” Flyer, Chemical Waste Management, Inc. April 26, 2018.
19. “Air Quality Monitoring at the Kettleman Hills Facility.” Wenck Associates, Inc. April 2019.
20. “Control de Calidad del Aire en las Instalaciones de Kettleman Hills.” Wenck Associates, Inc. April 2019.
21. “Kettleman Hills Facility 2018 Groundwater and Unsaturated Zone Annual Summary.” AMEC Foster Wheeler. April 2019.
22. “Resumen Anual 2018 de Las Aguas Subterráneas y Zonas Insaturadas de las Instalaciones de Kettleman Hills.” AMEC Foster Wheeler. April 2019.
23. “Kettleman Hills Facility 4th Annual Informational Meeting.” Flyer, Chemical Waste Management, Inc. April 23, 2019.
24. “Instalación de Kettleman Hills 4ª Reunión Informativa Annual.” Flyer, Chemical Waste Management, Inc. April 23, 2019.

#### **D. PUBLIC COMMENTS AND OTHER PUBLIC RESPONSES RECEIVED**

1. Comments Received on the 2007 Proposed Coordinated Approval
  - a. “In Re: US Environmental Protection Agency (EPA) Workshop and Public Hearing About Draft Permit for PCB Activities at Chemical Waste Management, Inc. Kettleman Hills Facility and Draft Environmental Justice Assessment.” Condensed Transcript. Diana K. Morris, CSR No. 12451. March 27, 2007.
  - b. “Comment Sheet for Draft Permit for CWM Kettleman Hills Facility and/or Draft Environmental Justice Assessment, Public Comments.” March 27, 2007. [REDACTED for posting on regulations.gov].
  - c. “Comments on the Draft Environmental Justice Assessment for Chemical Waste Management’s Kettleman Hills Facility” Comment Letter, Center on Race Poverty and the Environment, April 23, 2007. [REDACTED for posting on regulations.gov].
  - d. “Declarations of Residents of Kettleman City and Avenal City.” Transcribed and Translated Public Comments. May 1, 2007. [REDACTED for posting on regulations.gov]
  - e. “Why the US EPA’s Draft Environmental Justice Assessment and PCB Permit are Wrong!” El Pueblo’s Bullet Points on EJ Assessment, May 1, 2007.
  - f. “U.S. EPA’s Draft Environmental Justice Assessment of the Chemical Waste Management Hazardous Waste Facility in Kettleman City, California is Environmental Racism and Injustice.” Statement. Maricela Mares Alatorre, El Pueblo, et al. May 1, 2007.



- g. “Comments of Greenaction for Health and Environmental Justice and El Pueblo Para El Aire Y Agua Limpia/ People for Clean Air and Water documenting why US EPA must rescind their “Draft Environmental Justice Assessment” and reject the proposed permit for the Chemical Waste Management Kettleman Hills Facility.” Letter, Maricela Mares-Alatorre, El Pueblo Para el Aire y Agua Limpio and Erica Swinney, Greenaction for Health and Environmental Justice to Max Weintraub/Debbie Lowe, U.S. EPA Region 9. May 21, 2007.
  - h. “Chemical Waste Management, Inc. – Kettleman Hills Facility Comments on Draft Coordinated Approval.” Letter Robert Henry, Chemical Waste Management, Inc. to Max Weintraub, U.S. EPA Region 9. June 1, 2007.
  - i. “Kettleman City Draft EJ Assessment.” Letter, Steven Morgan, Chemical Waste Management, Inc. to Max Weintraub and Debbie Lowe, U.S. EPA Region 9. June 1, 2007.
  - j. “Kettleman Elementary Hearing, March 27, 2007.” Letter, Alexis Yalon, Paulson Reporting and Litigation Services to Max Weintraub, U.S. EPA Region 9. June 18, 2007. With enclosure: “In Re: US Environmental Protection Agency (EPA) Workshop and Public Hearing About Draft Permit for PCB Activities at Chemical Waste Management, Inc. Kettleman Hills Facility and Draft Environmental Justice Assessment.” Original Transcript. Diana K. Morris, CSR No. 12451. March 27, 2007.
2. Comments Received on the 2019 Proposal Approval
- a. “Kettleman City PCB Permit.” Email, Maricela Mares-Alatorre, El Pueblo of Kettleman City to Frances Wicher, et al., U.S. EPA Region 9. May 20, 2019.
  - b. “Proposed Dates for EPA Kettleman City Public Meeting.” Email, Bradley Angel, Greenaction to Frances Wicher, U.S. EPA Region 9. July 15, 2019.
  - c. “Proposed Dates for EPA Kettleman City Public Meeting.” Email, Maricela Mares-Alatorre, El Pueblo of Kettleman City to Frances Wicher, et al., U.S. EPA Region 9. July 15, 2019.
3. Other Comments Received
- a. “Civil Rights and Environmental Justice Discrimination in Kettleman City, CA.” Letter, Center on Race, Poverty & the Environment to Senator Barbara Boxer. September 29, 2008.
  - b. “Kettleman City Listening Session Kettleman Community Center, Kettleman, CA, Wednesday, August 12, 2009.” Transcript. August 12, 2009. [REDACTED for posting on regulations.gov].
  - c. “Dear State of California EPA/Department of Toxic Substances Control.” Public Petition. April 2010. [REDACTED for posting on regulations.gov].
  - d. Letter, Jared Blumenfeld, Regional Administrator, U.S. EPA Region 9, to Senator Diane Feinstein. April 8, 2010.



- e. “Padres Hacia una Vida Mejor, et al v. California Environmental Protection Agency, Department of Toxic Substances Control, et al, Complaint No. 01R-95-R9.” Letter, Center on Race Poverty & the Environment, et al to Lisa Jackson, Administrator, U.S.EPA. June 8, 2010.
- f. “Questions and EPA Responses Received From Greenaction/Center on Race, Poverty, and the Environment Regarding CWM PCB Congener Study Report.” U.S. EPA Region 9. January 2011.
- g. “FW: Responses to Mr. Angel Concerning CWM Kettleman Hills, March 14, 2016.” Email, Barbara Gross, U.S. EPA Region 9, to Bradley Angel, Greenaction, et al. March 30, 2016.
- h. “Request regarding November 16 Kettleman City public meeting.” Emails, Tom Huetteman, et al. U.S EPA Region 9 to Bradley Angel, Greenaction, et al. November 9, 2017.
- i. “Questions on landfill liners.” Email, Frances Wicher, U.S. EPA Region 9, to Maricela Mares-Alatorre, El Pueblo. December 15, 2017.
- j. “Touch base on Kettleman Hills Facility PCB application.” Email, Frances Wicher, to Maricela Mares-Alatorre, El Pueblo of Kettleman City. May 28, 2019.

## **V. CHEMICAL WASTE MANAGEMENT, INC. APPLICATION FOR TSCA APPROVAL RENEWAL**

### **A. OCTOBER 2018 APPLICATION**

1. “TSCA Permit Renewal Application, Chemical Waste Management, Kettleman Hills Facility.” Chemical Waste Management, Inc., Revision 3: October 1, 2018.
2. “TSCA Permit Renewal Application, Chemical Waste Management, Kettleman Hills Facility.” Chemical Waste Management, Inc., Revision 3: October 1, 2018. Redlined.
3. “TSCA Operation Plan, Landfill B-18 Phases I, II, and III; PCB Building and Outside Containment Area.” Chemical Waste Management, Inc., Revision 3: October 1, 2018.
4. “TSCA Operation Plan, Landfill B-18 Phases I, II, and III; PCB Building and Outside Containment Area.” Chemical Waste Management, Inc., Revision 3: October 1, 2018. Redlined.
5. “Chemical Waste Management, Inc. – Kettleman Hills Facility Revised TSCA Permit Renewal Application – Revision 3.” Reyna Verdin, Chemical Waste Management, Inc. to Frances Wicher, U.S. EPA Region 9. October 2, 2018.
6. “Chemical Waste Management, Inc. – Kettleman Hills Facility Class 1 Permit Modification: Contingency Plan and Training Plan.” Reyna Verdin, Chemical Waste Management, Inc. to Camille Rogado, Department of Toxic Substances Control. May 30, 2019. [REDACTED for posting on regulations.gov].



**B. APRIL 2018 APPLICATION**

1. “Chemical Waste Management, Inc. – Kettleman Hills Facility Re: TSCA Permit Renewal Application – Revision 1: July 15, 2017.” Reyna Verdin, Chemical Waste Management, Inc. to Frances Wicher, U.S. EPA Region 9. February 14, 2018.
2. “Chemical Waste Management, Inc. – Kettleman Hills Facility Revised TSCA Permit Renewal Application – Revision 2.” Reyna Verdin, Chemical Waste Management, Inc. to Frances Wicher, U.S. EPA Region 9. April 19, 2018.
3. “TSCA Permit Renewal Application, Chemical Waste Management, Kettleman Hills Facility.” Revision 2: April 20, 2018.
4. “Hazardous Waste Facility Permit Renewal Application, Operation Plan, Chemical Waste Management, Inc. Kettleman Hills Facility.” Chemical Waste Management, Inc. Revision 3: March 16, 2018. [REDACTED for posting on regulations.gov]
5. “Closure and Post-Closure Plans, Kettleman Hills Facility, Kings County, California.” Golder Associates, Inc. March 15, 2018.

**C. PREVIOUS APPLICATIONS**

1. “TSCA Approval Renewal for Landfill Unit B-18, Chemical Waste Management, Inc. – Kettleman Hills Facility, CAT 000646 0117.” Letter, Paul E. Turek, Chemical Waste Management, Inc. to Yoshiro Tokiwa, U.S. EPA Region 9. April 1, 1997 with Enclosures.
2. “TSCA Approval Renewal for Landfill Unit B-14, B-16 and B-19 and Ancillary Commercial Storage Activities, Chemical Waste Management, Inc. – Kettleman Hills Facility, CAT 000646 0117.” Letter, Paul E. Turek, Chemical Waste Management, Inc. to Yoshiro Tokiwa, U.S. EPA Region 9. July 1, 1997. With enclosure.
3. “TSCA Approval Renewal for Landfill Unit B-18, Chemical Waste Management, Inc. – Kettleman Hills Facility, CAT 000646 0117.” Letter, Paul E. Turek, Chemical Waste Management, Inc. to Yoshiro Tokiwa, U.S. EPA Region 9. July 28, 1997. With enclosure.
4. Letter, Max Weintraub, U.S. EPA Region 9, to Paul E. Turek, Chemical Waste Management, Inc. August 21, 1998.
5. “Status of B-14 and B-19 Landfills Related to TSCA Letter of Authorization Renewal Request, Chemical Waste Management, Kettleman Hills Facility.” Letter, Paul E. Turek, Chemical Waste Management, Inc. to Max Weintraub, U.S. EPA Region 9. August 26, 1998.
6. “Chemical Waste Management, Inc. – Kettleman Hills Facility Request for Submittal for Approval – Revised PCB Operations Plan.” Letter, Paul E. Turek, Chemical Waste Management, Inc. to Max Weintraub, U.S. EPA Region 9. April 14, 1999. With enclosure: “Operation Plan, Landfill Unit B-18 and B-16; Closed Landfill Unit B-14, In Closure Landfill Unit B-19, Kettleman Hills Facility Chemical Waste Management, Inc.” Chemical Waste Management, Inc. April 1999.



7. “Chemical Waste Management, Inc. – Kettleman Hills Facility Request for TSCA PCB Coordinated Approval.” Letter, Paul E. Turek, Chemical Waste Management, Inc. to Wayne Nastri, U.S. EPA Region 9. October 20, 2003. With enclosure.
8. “TSCA Approval Modification for Certain PCB Activities.” Letter, Paul E. Turek, Chemical Waste Management, Inc. to Max Weintraub, U.S. EPA Region 9. January 13, 2005. With enclosure.
9. “TSCA Approval Modification for Certain PCB Activities.” Letter, Paul Bisson, U.S. EPA Region 9, to Paul E. Turek, Chemical Waste Management, Inc. March 8, 2005.
10. “Chemical Waste Management, Inc. – Kettleman Hills Facility Request for to Modify TSCA PCB Coordinated Approval.” Letter, Paul E. Turek, Chemical Waste Management, Inc. to Cheryl Nelson, U.S. EPA Region 9. June 26, 2009. With enclosures: “Initial Report TSCA Approval Request Chemical Waste Management, Inc. Kettleman Hills Facility Landfill Unit B-18, Phases I, II, and III.” and “Operation Plan, Landfill Unit B-18, Phases I, II, and III Kettleman Hills Facility Chemical Waste Management, Inc.” Chemical Waste Management, Inc. Revision 1: June 26, 2009.
11. “Chemical Waste Management, Inc. – Kettleman Hills Facility Request for to Modify TSCA PCB Coordinated Approval.” Letter, Paul E. Turek, Chemical Waste Management, Inc. to Cheryl Nelson, U.S. EPA Region 9. July 28, 2009. With enclosures: “Operation Plan, Landfill Unit B-18, Phases I, II, and III Kettleman Hills Facility Chemical Waste Management, Inc.” Chemical Waste Management, Inc. Revision 1: July 27, 2009 and other documents documenting approval of waste disposal in Landfill B-18 Phases I and II.
12. “Chemical Waste Management, Inc. – Kettleman Hills Facility Revised Initial Report, Omission from Response to Landfill B-18 Phase III Coordinated Approval Completeness Review.” Letter, Paul E. Turek, Chemical Waste Management, Inc. to Chip Poalinelli, U.S. EPA Region 9. February 18, 2010. With Enclosure: “Initial Report, TSCA Approval Request, Chemical Waste Management, Inc. Kettleman Hills Facility, Landfill Unit B-18, Phase I, II, and III.” Chemical Waste Management, Inc. February 17, 2010.
13. “Chemical Waste Management, Inc. – Kettleman Hills Facility Response to Notice of Deficiency – TSCA Permit Renewal and Modification.” Letter, Paul Turek, Chemical Waste Management, Inc. to Edwin Poalinelli, U.S. EPA Region 9. November 21, 2011 with Enclosures: 1) “Chemical Waste Management, Inc. – Kettleman Hills Facility (KHF), EPA-IX Notice of Deficiency for TSCA Permit Renewal and Modification Applications – Attachment A, dated September 22, 2011.” Chemical Waste Management, Inc. (November 21, 2011); 2) “TSCA Application – Supplemental Information.” Chemical Waste Management, Inc. (November 21, 2011); 3) “Initial Report, TSCA Approval Request, Chemical Waste Management, Inc. Kettleman Hills Facility, Landfill Unit B-18, Phase I, II, and III.” Chemical Waste Management, Inc. November 21, 2011 and 4) “TSCA Operation Plan, landfill Unit B-18, Phases I, II, and III, Kettleman Hills Facility, Chemical Waste Management, Inc.” Chemical Waste Management, Inc. November 21, 2011.





14. “Chemical Waste Management, Inc. – Kettleman Hills Facility TSCA Certification” Letter, Robert G. Henry, Chemical Waste Management, Inc. to Edwin Poalinelli, U.S. EPA Region 9. January 24, 2012.
15. “Additional Permit Requests for the PCB Building.” Email, Bob Henry, Chemical Waste Management, Inc. to Edwin Poalinelli, U.S. EPA Region 9. February 4, 2013.
16. “Chemical Waste Management, Inc. – Kettleman Hills Facility TSCA Permit Renewal – Supplemental Information.” Letter, Paul Turek, Chemical Waste Management, Inc. to Edwin Poalinelli, U.S. EPA Region 9. March 8, 2013. With enclosure.
17. “TSCA Supplemental Information – NOD 3/23/13 Response.” Spreadsheet, Chemical Waste Management. March 27, 2013.
18. “Chemical Waste Management Inc. – Kettleman Hills Facility Revised TSCA Permit Renewal Application – Revision 1.” Reyna Verdin, Chemical Waste Management, Inc. to Frances Wicher, U.S. EPA, July 13, 2017. With enclosures:
19. “TSCA Permit Renewal Application, Chemical Waste Management, Inc. Kettleman Hills Facility.” Chemical Waste Management, Inc., Revision 1: July 15, 2017.
20. “Hazardous Waste Facility Permit Renewal Application, Operation Plan, Chemical Waste Management, Inc. Kettleman Hills Facility.” Chemical Waste Management, Inc. Revision 2: July 15, 2017. [REDACTED]

## **VI. REQUESTS FOR INFORMATION, NOTICES OF DEFICIENCIES, AND RESPONSES**

### **A. U.S. EPA 2016 REQUEST FOR UPDATE AND RESPONSE/DEPARTMENT OF TOXIC SUBSTANCES CONTROL FIRST NOTICE OF DEFICIENCY**

1. 2016 U.S. EPA Request for Update and Department of Toxic Substances Control First Notice of Deficiency
  - a. “Notice of Deficiency for the Permit Renewal Application for the Chemical Waste Management, Inc., Kettleman Hills Facility Hazardous Waste Facility, 35251 Old Skyline Road, Kettleman City, Kings County, California, 93239, Environmental Protection Agency Identification Number: CAT000646117.” Letter, Ryan Batty, Department of Toxic Substance Control, to Bob Henry, Chemical Waste Management, Inc. November 18, 2016. With enclosures.
  - b. Letter, Tom Huetteman, U.S. EPA Region 9, to Robert Henry, Chemical Waste Management, Inc. December 20, 2016.
  - c. “Letter following up on the discussions at the November 30, 2016 meeting.” Email, Bob Henry, Chemical Waste Management, Inc. to Frances Wicher, U.S. EPA Region 9. January 13, 2017.
  - d. “Letter following up on the discussions at the November 30, 2016 meeting.” Email, Frances Wicher, U.S. EPA Region 9 to Bob Henry, Chemical Waste Management, Inc. January 17, 2017.



- e. “Request for a Response Extension for the Notice of Deficiency for the Permit Renewal Application for the Chemical Waste Management, Inc., Kettleman Hills Facility Hazardous Waste Facility, 35251 Old Skyline Road, Kettleman City, Kings County, California, 93239, Environmental Protection Agency Identification Number: CAT000646117.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Ryan Batty, Department of Toxic Substances Control. February 7, 2017.
  - f. “Approval of Extension to Respond to Notice of Deficiency, Permit Renewal for the Chemical Waste Management, Inc., Kettleman Hills Facility, Kings, County, California; EPA ID. No. CAT000646117.” Letter, Ryan Batty, Department of Toxic Substances Control to Reyna Verdin, Chemical Waste Management, Inc. February 14, 2017.
  - g. “Revised submittal schedule for the TSCA application.” Email, Frances Wicher, U.S. EPA to Bob Henry, Chemical Waste Management, Inc. February 21, 2017.
  - h. “Revised submittal schedule for the TSCA application.” Email, Frances Wicher, U.S. EPA to Bob Henry, Chemical Waste Management, Inc. February 24, 2017.
  - i. “March 7, 2017 DTSC (GSU) Meeting Notes.” Email Bob Henry, Chemical Waste Management, Inc. to Ryan Batty, Department of Toxic Substances Control. March 9, 2017 with attachment: “Proposed Changes to Table 1 (Draft).”
  - j. “FW: Minutes for Kettleman Hills meeting.” Email, Ryan Batty, Department of Toxic Substances Control, to Bob Henry, Chemical Waste Management, Inc. March 10, 2017.
2. Response to 2016 Request for Update/Department of Toxic Substances Control First Notice of Deficiency
- a. First Incremental Submittal
    - (1) “Responses to the Permit Renewal Application Notice of Deficiency. Submittal No. 1 (March 15, 2017) Kettleman Hills Facility – Kings, County, California; EPA ID. NO. CAT000646117.” Letter, Michelle Kampen and Ryan Hillman, Golder Associates to Ryan Batty, Department of Toxic Substances Control, and Frances Wicher, U.S. EPA Region 9. March 15, 2017 including 3 Attachments.
  - b. Second Incremental Submittal
    - (1) “Responses to the Permit Renewal Application Notice of Deficiency. Submittal No. 2 (April 15, 2017) Kettleman Hills Facility – Kings, County, California; EPA ID. NO. CAT000646117.” Letter, Michelle Kampen and Ryan Hillman, Golder Associates to Ryan Batty, Department of Toxic Substances Control, and Frances Wicher, U.S. EPA Region 9. April 15, 2017 including 12 attachments.
    - (2) “Exposure Information Report for the Chemical Waste Management, Inc. Kettleman Hills Facility, Kings County California. EPA ID No. CAT000646117.” August 8, 1985.



- (3) “Potential Release Report for the Chemical Waste Management, Inc. Kettleman Hills Facility, Kings County California. EPA ID No. CAT000646117.” September 6, 1985.
- (4) “Response to July 1985 Second Notice of Deficiency – Engineering Plans, Specifications and Certification Reports for Existing Surface Impoundment Units, Kettleman Hills Facility, Kings County, California.” EMCON Associates. September 7, 1985.
- (5) “Final Environmental Impact Report – Chemical Waste Management, Inc. Kettleman Hills Hazardous Waste Treatment, Storage, and Disposal Facility.” CH2M Hill. October 1985.
- (6) “State Siting Criteria Equivalency Assessment for Chemical Waste Management’s Inc. Kettleman Hills Facility.” Meredith/Boli & Associates, Inc. October 28, 1985.
- (7) “Inorganic Chemical Characterization of Ground Water, Kettleman Hills Facility, Kettleman Hills, California.” EMCON Associates. April 1, 1986.
- (8) “Interim Status Period Ground-Water Monitoring Results Kettleman Hills Facility, Kettleman Hills Facility, Kettleman Hills, California.” EMCON Associates. April 1, 1986.
- (9) “Construction Certification Report Pond P-16 Kettleman Hills Facility, Kings County, California.” EMCON Associates. May 23, 1986.
- (10) “Construction Certification Report Pond P-9 Kettleman Hills Facility, Kings County, California.” EMCON Associates. May 27, 1986.
- (11) “Chemical Waste Management, Inc. – Quality Assurance Manual for the Installation of the Soil Components of Lining and Final Cover Systems.” Golder Associates, Inc. June 1, 1986.
- (12) “Construction Certification Report Pond P-14 Kettleman Hills Facility Kings County, California.” EMCON Associates. July 9, 1986.
- (13) “Faulting/Seismicity Report Kettleman Hills Facility for Chemical Waste Management, Inc.” Dames & Moore. November 10, 1986.
- (14) “Neutralization/Filtration Unit Operation Plan for Chemical Waste Management, Inc.’s Kettleman Hills Facility, Kings County, California.” Chemical Waste Management, Inc. November 10, 1986.
- (15) “RCRA Facility Assessment of Solid Waste Management Units at Chemical Waste Management, Inc.’s Kettleman Hills Facility, Kettleman City, California.” A.T. Kearney, Inc. February 20, 1987.
- (16) ““Certification and Signatory”” page for October 1985 Interim Status Monitoring Plan for Chemical Waste Management’s Kettleman Hills Facility.” EMCON. December 27, 1987. Includes “Hydrogeologic Characterization, Kettleman Hills Facility, Kings County, California.” EMCON Associates. December 1986.



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- (17) “Proposed Evaporative Tank System, Application to Modify the Kettleman Hills Facility Part B Permit (CAT000646117).” Meredith/Boli & Associates, Inc. August 12, 1988.
  - (18) “California Regional Water Quality Control Board Central Valley Region, Resolution No. 88-155, Amendment to the Water Quality Control Plan for the Tulare Lake Basin (5D).” California Regional Water Quality Control Board – Central Valley Region. August 11, 1989.
  - (19) “Certification Report September 12, 1989 for Drum Storage Unit Kettleman Hills Facility, Kings County, California.” Engineering Services, Inc. September 12, 1989.
  - (20) “Bid Documents for Evaporative Tank Farm Kettleman Hills Facility, Kettleman City, California.” ESI Engineering Services, Inc. September 26, 1989.
  - (21) “State Water Resource Control Board Resolution No. 90-5 – Approval of an Amendment to the Water Quality Control Plan for Tulare Lake Basin (Basin 5D) Deleting a Beneficial Use Designation for Specific Ground Waters in the Vicinity of Kettleman Hills.” California Regional Water Quality Control Board – Central Valley Region. January 18, 1990.
  - (22) “Certification Report February 13, 1990 for Final Stabilization Unit, Kettleman Hills Facility, Kings County, California.” Engineering Services, Inc. February 13, 1990.
  - (23) “Phase I Holocene Surface Faulting Study Nunez Fault and Kettleman Hills Facility for Chemical Waste Management, Inc.” Roger Foott Associates, Inc. April 2, 1990.
  - (24) “Evaporative Tank Farm Design Drawings.” ESI Engineering Services Inc. May 11, 1990.
  - (25) “Quality Assurance Manual for the Installation of the Geosynthetic Lining Systems.” Chemical Waste Management, Inc. June 15, 1990.
  - (26) “Stabilized Bulk Waste Storage Area Design Plans and Specifications Kettleman Hills Facility.” Golder Associates, Inc. June 27, 1990.
  - (27) “Second Generation Stabilization Engineering Report for Chemical Waste Management, Inc. Kettleman Hills Facility, Kettleman City, California. Vol. 1.” RUST. July 27, 1990.
  - (28) “Second Generation Stabilization Engineering Report for Chemical Waste Management, Inc. Kettleman Hills Facility, Kettleman City, California. Vol. 2.” RUST. July 27, 1990.
  - (29) “Second Generation Stabilization Engineering Report for Chemical Waste Management, Inc. Kettleman Hills Facility, Kettleman City, California. Vol. 3.” RUST. July 27, 1990.



- (30) “Kettleman Hills Facility CAT 000 646 117 Evaporative Tank System EPA/DHS Permit Conditions III.K.2. and III.K.3.” Letter, Carol J. Carollo, Chemical Waste Management, Inc. to Director Hazardous Waste Management Division, U.S. EPA Region IX. July 30, 1990 with Attachment “Quality Assurance Plan, Chemical Waste Management, Inc. Kettleman Hills Facility, Evaporative Tank System.” July 30, 1990.
- (31) “Construction Specifications and Quality Assurance Plan, Landfill Unit B-18 Phases I and II and Final Closure, Kettleman Hills Facility, Kings County, California.” Environmental Solutions, Inc. July 31, 1990.
- (32) “Landfill Unit B-18 Phases I and II and Final Closure Volume II.” Environmental Solutions, Inc. August 1, 1990.
- (33) “Transmittal Engineering and Design Report Landfill Unit B-18, Kettleman Hills Facility, Kings County, California.” Environmental Solutions, Inc. August 15, 1990.
- (34) “Bulk Storage Unit Phase 2 Design Plans and Specifications Kettleman Hills Facility.” Golder Associates, Inc. November 1, 1991.
- (35) “Clay Source Report Landfill B-18, Phases I1 and IB Kettleman Hills Facility, Kettleman City, California.” Environmental Construction Services, Inc. November 25, 1991.
- (36) “Subgrade Geologic Mapping and Chemical Analysis for Landfill B-18, Phase I Kettleman Hills Facility, California.” Golder Associates, Inc. November 1991.
- (37) “Secondary Clay Liner Report Landfill B-18, Phases IA and IB, Kettleman Hills Facility, Kettleman City, California.” Environmental Construction Services, Inc. January 6, 1992.
- (38) “Potential Chemical Similarities between the B-19 and B-18 Clay, Kettleman Hills Facility.” Environmental Solutions, Inc. January 9, 1992.
- (39) “Secondary HDPE Liner and Leachate Collection System Report Landfill B-18, Phases IA and IB Kettleman Hills Facility, Kettleman City, California, Volume A.” Environmental Construction Services, Inc. January 13, 1992.
- (40) “Secondary HDPE Liner and Leachate Collection System Report Landfill B-18, Phases IA and IB Kettleman Hills Facility, Kettleman City, California, Volume A.” Environmental Construction Services, Inc. January 13, 1992.
- (41) “Primary Clay Liner Report Landfill B-18, Phases IA and IB, Kettleman Hills Facility, Kettleman City, California.” Environmental Construction Services, Inc. January 13, 1992.
- (42) “Secondary HDPE Liner and Leachate Collection System Report Landfill B-18, Phases IA and IB Kettleman Hills Facility, Kettleman City, California Volume A” Environmental Construction Services, Inc. January 13, 1992.



- (43) “Secondary HDPE Liner and Leachate Collection System Report Landfill B-18, Phases IA and IB Kettleman Hills Facility, Kettleman City, California Volume B” Environmental Construction Services, Inc. January 13, 1992.
- (44) “Primary HDPE Liner and Leachate Collection System Report Landfill B-18, Phases IA and IB Kettleman Hills Facility, Kettleman City, California Volume B” Environmental Construction Services, Inc. January 20, 1992.
- (45) “Test Fill and Infiltration Test Results Landfill Unit B-18 Phases I and II and Final Closure.” Environmental Solutions, Inc. January 23, 1992.
- (46) “Summary Construction Report Landfill B-18, Phases IA and IB Kettleman Hills Facility, Kettleman City, California.” Environmental Construction Services, Inc. February 18, 1992.
- (47) “Design Changes and Design Clarifications Landfill B-18, Phases IA and IB Kettleman Hills Facility, Kettleman City, California.” Environmental Construction Services, Inc. February 18, 1992.
- (48) “Field Observations and Field and Laboratory Testing For The Construction of Phase 2 Bulk Storage Unit (BSU), Revision 1.” Golder Construction Services, Inc. May 1, 1992.
- (49) “Field Observations, and Field and Laboratory Testing for the Construction of Phase I Stabilized Bulk Waste Storage Area (SBWSA).” Golder Construction Services, Inc. May 1, 1992.
- (50) “Response Action Plan, Landfill B-18, Kettleman Hills Facility.” SEC Donohue, Inc. June, 1992.
- (51) “Operational Features Report Landfill B-18, Phases IA and IB, Kettleman Hills Facility, Kettleman City, California.” Environmental Construction Services, Inc. June 26, 1992.
- (52) “Vadose Zone Response Plan Landfill B-18, Kettleman Hills Facility.” SEC Donohue, Inc. June 1992.
- (53) “Landfill Unit B-18, Phases IIA and IIB Construction Reports, Volume 1 – Clay Liner Source Report.” Golder Construction Services, Inc. May 1, 1993.
- (54) “Landfill B-18, Phases IIA and IIB Construction Reports, Volume 2 – Subgrade Geologic Mapping and Chemical Analysis Report.” Golder Construction Services, Inc. May 1, 1993.
- (55) “Revised Intermediate Waste Fill Plan Landfill Unit B-18, Phase I, Kettleman Hills Facility, Kings County, California.” Environmental Solutions, Inc. August 1, 1993.
- (56) “Final Report, Construction Reports for Landfill B-18, Phases IIA and IIB, Kettleman City, California, Excavation and Structural Fill Replacement Construction Report Volume 3.” Golder Construction Services, Inc. August 27, 1993.





- (57) “Final Report Construction Reports for Landfill B-18, Phases IIA and IIB, Kettleman City, California, Excavation and Structural Fill Replacement Construction Report Volume 3 – Attachment 1 (OVS).” Golder Construction Services, Inc. August 27, 1993.
- (58) “Final Report Construction Reports for Landfill B-18, Phases IIA and IIB, Kettleman City, California, Excavation and Structural Fill Replacement Construction Report Volume 3 – Attachment 2 (OVS).” Golder Construction Services, Inc. August 27, 1993.
- (59) “Final Report Construction Reports for Landfill B-18, Phases IIA and IIB, Kettleman City, California, Secondary Clay Liner Construction Report, Volume 4.” Golder Construction Services, Inc. September 13, 1993.
- (60) “Final Report Construction Reports For Landfill B-18, Phases IIA and IIB, Kettleman City, California, Secondary and Vadose HDPE Liner and Leachate Collection System Construction Report Volume 5.” Golder Construction Services, Inc. October 20, 1993.
- (61) “Landfill B-18 Phases IIA and IIB Construction Reports, Volume 5A – Secondary and Vadose HDPE Liner and Leachate Collection System Report (Appendices A-D).” Golder Construction Services, Inc. October 1993.
- (62) “Landfill B-18, Phases IIA and IIB Construction Reports Volume 5B – Secondary and Vadose HDPE Liner and Leachate Collection System Report (Appendix E).” Golder Construction Services, Inc. October 1993.
- (63) “Landfill B-18, Phases IIA and IIB Construction Reports, Volume 5C – Secondary and Vadose HDPE Liner and Leachate Collection System Report (Appendices F-O).” Golder Construction Services, Inc. October 20, 1993.
- (64) “Construction Report Landfill B-18, Phases IIA and IIB Volume 6 – Primary Clay Liner.” Golder Construction Services, Inc. October 20, 1993.
- (65) “Landfill B-18, Phases IIA and IIB Construction Reports Volume 7A – Primary HPDE Liner and Leachate Collection System Report (Appendices).” Golder Construction Services, Inc. November 8, 1993.
- (66) “Final Report to Chemical Waste Management, Inc. Kettleman Hills Facility, Kettleman City, California. Construction Reports for Landfill B-18, Phases IIA and IIB, Kettleman City, California, Primary HDPE Liner and Leachate Collection System Construction Report, Volume 7.” Golder Construction Services, Inc. November 8, 1993.
- (67) “Landfill B-18, Phases IIA and IIB Construction Reports, Volume 8 – Summary Construction Report.” Golder Construction Services, Inc. November 1993.
- (68) “Final Report to Chemical Waste Management, Inc. Kettleman Hills Facility, Kettleman City, California. Construction Reports for Landfill B-18, Phases IIA and IIB, Kettleman City, California, Operational Features Report, Volume 9.” Golder Construction Services, Inc. December 6, 1993.



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- (69) “Kettleman Hills Landfill B-18 Phase II & IIB Response Action Plan Update.” Rust Environment & Infrastructure, Inc. January 29, 1994.
- (70) “Construction Quality Assurance Report for Surface Impoundment P-15 Emergency Retrofit Kettleman Hills Facility.” Golder Construction Services, Inc. February 1, 1995.
- (71) “Partial Closure Certification Report for Surface Impoundment P-15.” Rust Environment & Infrastructure, Inc. January 17, 1997.
- (72) “Draft Subsequent Environmental Impact Report. B-18/B-20 Hazardous Waste Disposal Project Kettleman Hills Facility Chemical Waste Management, Inc.” CH2MHill. March 2008.
- (73) “Draft Subsequent Environmental Impact Report – Volume II: Appendices. B-18/B-20 Hazardous Waste Disposal Project Kettleman Hills Facility Chemical Waste Management, Inc.” CH2MHill. March 2008.
- (74) “Revised Project Description and Analysis; Draft Subsequent Environmental Impact Report. B-18/B-20 Hazardous Waste Disposal Project Kettleman Hills Facility Chemical Waste Management, Inc.” CH2MHill. May 1, 2008.
- (75) “Recirculated Portions of Draft Subsequent Environmental Impact Report Draft. B-18/B-20 Hazardous Waste Disposal Project Kettleman Hills Facility.” CH2MHill. May 1, 2009.
- (76) “Engineering and Design Report B-18 Class I Landfill Phase III Expansion and Final Closure Kettleman Hills Facility.” Golder Associates, Inc. August 1, 2011.
- (77) “Assessment of Increasing Groundwater Levels and Trichloroethene Concentrations in the K40 Corrective Action Area.” AMEC Environmental & Infrastructure. July 18, 2012.
- (78) “Transmittal of Adopted Waste Discharge Requirements Order R5-2014-0003, Chemical Waste Management, Inc., Kettleman Hills Facility, Kings County.” Letter Regional Water Quality Control Board – Central Valley Region to Jim Sook, Chemical Waste Management, Inc. February 6, 2014. With enclosures: 1) “Order R5-2014-0003 Waste Discharge Requirements for Chemical Waste Management, Inc. Class I/II Waste Management Units Kettleman Hills Facility Kings County.” California Regional Water Quality Control Board Central Valley. January 14, 2014.
- (79) “Construction Quality Assurance (CQA) Report for Landfill B-18 Phase III Expansion – Volume 1: Phase IIIA Subgrade and Secondary Clay Liner.” Golder Associates, Inc. January 2015.
- (80) “Construction Quality Assurance (CQA) Report for Landfill B-18 Phase III Expansion – Volume 2: Phase IIIA Geosynthetics and Operations Layer.” Golder Associates, Inc. February 2015.



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- (81) “Construction Quality Assurance (CQA) Report for Landfill B-18 Phase III Expansion – Volume 3: Phase IIIB Phase IIIB subgrade and Secondary Clay Liner.” Golder Associates, Inc. November 2015.
  - (82) “Construction Quality Assurance (CQA) Report for Landfill B-18 Phase III Expansion – Volume 4: Phase IIIB Geosynthetics, Phase IIIB Operations Layer, and Phase III Operations Features.” Golder Associates, Inc. December 2015 (Revised April 2016).
  - (83) “Operations and Maintenance Plan for the Spill Isolation and Containment System at the Sampling Platforms and Untarping Racks.” Golder Associates, Inc. May 2016.
  - (84) “Construction Quality Assurance (CQA) Report for the Phase 1 Construction of the Spill Isolation and Containment System at the Sampling Platforms and Untarping Racks, Kettleman Hills Facility – Kings County, California.” Letter, Golder Associates, Inc. to Rober Henry, Chemical Waste Management, Inc. May 27, 2016.
  - (85) “Responses to DTSC Review Comments on the Phase 1 and Phase 2 Construction Quality Assurance (CQA) Reports Spill Isolation and Containment System at the Sampling Platforms and Untarping Racks, Kettleman Hills Facility – Kings County, California.” Letter, Ryan Hillman, Golder Associates, Inc. to Rena Verdin, Chemical Waste Management, Inc. March 2, 2017.
  - (86) “Closure and Post-Closure Plans, Kettleman Hills Facility, Kings County, California.” Golder Associates, Inc. April 15, 2017.
- c. Third Incremental Submittal
- (1) “Responses to the Permit Renewal Application Notice of Deficiency. Submittal No. 3 (April 30, 2017) Kettleman Hills Facility – Kings, County, California; EPA ID. NO. CAT000646117.” Letter, Michelle Kampen and Ryan Hillman, Golder Associates to Ryan Batty, Department of Toxic Substances Control, and Frances Wicher, U.S. EPA Region 9. April 30, 2017. Including attachments – Responses to Specific Comments 1-7.
- d. Fourth Incremental Submittal
- (1) “Responses to the Permit Renewal Application Notice of Deficiency. Submittal No. 4 (May 1, 2017) Kettleman Hills Facility – Kings, County, California; EPA ID. NO. CAT000646117.” Letter, Michelle Kampen and Ryan Hillman, Golder Associates to Ryan Batty, Department of Toxic Substances Control, and Frances Wicher, U.S. EPA Region 9. May 1, 2017. Including attachments Responses to HERO Memorandum General Comment #1 and Specific Comments #1-15.
  - (2) “Kettleman Hills Facility, Air Monitoring – Technical Work Plan.” NUS Corporation. February 24, 1986.



- (3) “California Regional Water Quality Control Board Central Valley Region, Resolution No. 88-051, Determination of the Existence of Absence of a Potential Source of Drinking Water Within One-Half Mile of the Surface Impoundments at Kettleman Hills Facility.” California Regional Water Quality Control Board – Central Valley Region. March 25, 1988.
- (4) “Air Quality Solid Waste Assessment Test Report, Kettleman Hills Facility, Kettleman City, California.” NUS Corporation. October 1988.
- (5) “Gaseous Tracer Study at the Chemical Waste Management Kettleman Hills Facility, November 7 -17, 1988.” Tracer Technologies. November 15, 1988.
- (6) “1994 Topographical, Meteorological and Airborne Contaminant Characterization at Kettleman Hills Facility – Volume I.” Rust Environment & Infrastructure, Inc. April 1995.
- (7) “1994 Topographical, Meteorological and Airborne Contaminant Characterization at Kettleman Hills Facility – Volume II.” Rust Environment & Infrastructure, Inc. April 1995.
- (8) “1994 Topographical, Meteorological and Airborne Contaminant Characterization at Kettleman Hills Facility – Volume III.” Rust Environment & Infrastructure, Inc. April 1995.
- (9) “1994 Topographical, Meteorological and Airborne Contaminant Characterization at Kettleman Hills Facility – Volume IV.” Rust Environment & Infrastructure, Inc. April 1995.
- (10) “1994 Topographical, Meteorological and Airborne Contaminant Characterization at Kettleman Hills Facility – Volume V.” Rust Environment & Infrastructure, Inc. April 1995.
- (11) “1994 Topographical, Meteorological and Airborne Contaminant Characterization at Kettleman Hills Facility – Volume VI.” Rust Environment & Infrastructure, Inc. April 1995.
- (12) “Subject: Air Toxics Information and Assessment Act, Chemical Waste Management, Inc. – Prioritization Score and Ranking Based on the Toxic Emissions Inventory Submitted for the 1992 Reporting Year, Facility ID#: 40029.” Letter, Seyed Sadredin, San Joaquin Valley Unified Air Pollution Control District to Paul Turek, Chemical Waste Management, Inc. June 25, 1996.
- (13) “Final Ambient Monitoring Plan.” EarthTech. February 2006.
- (14) “Site-Specific Ambient Monitoring Plan – First Revision.” EarthTech. February 2007.
- (15) “Site-Specific Ambient Monitoring Plan – Second Revision.” EarthTech. July 2007.



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- (16) “Dispersion Modeling Report Associated with the PCB Congener Study – Appendix G Laboratory Analytical Data TestAmerica.” Wenck Associates, Inc. May 9, 2009.
  - (17) “Final Subsequent Environmental Impact Report. B-18/B-20 Hazardous Waste Disposal Project Kettleman Hills Facility.” CH2MHill. September 1, 2009. First Part.
  - (18) “Final Subsequent Environmental Impact Report. B-18/B-20 Hazardous Waste Disposal Project Kettleman Hills Facility.” CH2MHill. September 1, 2009. Second Part.
  - (19) “Final Subsequent Environmental Impact Report. B-18/B-20 Hazardous Waste Disposal Project Kettleman Hills Facility.” CH2MHill. September 1, 2009. Third Part.
  - (20) “Dispersion Modeling Report Associated with the PCB Congener Study.” Wenck Associates, Inc. October 1, 2009.
  - (21) “Dispersion Modeling Report Associated with the PCB Congener Study – Appendix D Soil and Vegetation Sampling Field Book, Photo Logs, Data Sheets, etc.” Wenck Associates, Inc. October 1, 2009.
  - (22) “Surface Water Control Program for Kettleman Hills Facility,” Centra Consulting, Inc. October 23, 2009.
  - (23) “Site-Specific Ambient Air Monitoring Plan – Third Revision.” EarthTech. May 2010.
  - (24) “Site-Specific Ambient Air Monitoring Plan – Fourth Revision” EarthTech. November 2010.
  - (25) “Final Dioxin-Like Polychlorinated Biphenyl (PCB) Congeners Study Report, Chemical Waste Management, Inc. Kettleman Hills Facility (KHF).” Wenck Associates, Inc. November 2010.
  - (26) “Final 2011 Health Risk Assessment.” Wenck Associates, Inc. November 2011.
  - (27) “Final Annual Screening Level Health Risk Assessment October 2010 – September 2011, Chemical Waste Management, Inc. Kettleman Hills Facility (KHF)” Wenck Associates, Inc. July 2012.
  - (28) “Annual Screening Level Health Risk Assessment October 2011 – September 2012, Chemical Waste Management, Inc. Kettleman Hills Facility (KHF)” Wenck Associates, Inc. March 2013.
  - (29) “Annual Screening Level Health Risk Assessment October 2012 – September 2014, Chemical Waste Management, Inc. Kettleman Hills Facility (KHF)” Wenck Associates, Inc. March 2014.
  - (30) “Annual Screening Level Health Risk Assessment October 2013 – September 2014, Chemical Waste Management, Inc. Kettleman Hills Facility (KHF)” Wenck Associates, Inc. March 2015.



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- (31) “Site-Specific Ambient Air Monitoring Plan – Fifth Revision.” Wenck Associates, Inc. January 2016.
  - (32) “Annual Screening Level Health Risk Assessment October 2014 – September 2015, Chemical Waste Management, Inc. Kettleman Hills Facility (KHF)” Wenck Associates, Inc. March 2016.
  - (33) “Storm Water Pollution Prevention Plan Chemical Waste Management, Inc. – Kettleman Hills Facility.” Golder Associates, Inc. June 2015 (amended March 2016).
  - (34) “Annual Screening Level Health Risk Assessment October 2015 – September 2016, Chemical Waste Management, Inc. Kettleman Hills Facility (KHF)” Wenck Associates, Inc. March 2017.
- e. Fifth Incremental Submittal
- (1) Department of Toxic Substances Control/EPA Submittal
    - (a) “Responses to the Permit Renewal Application Notice of Deficiency. Submittal No. 5 (May 15, 2107) Kettleman Hills Facility -- Kings, County, California; EPA ID. NO. CAT000646117.” Letter, Michelle Kampen and Ryan Hillman, Golder Associates to Ryan Batty, Department of Toxic Substances Control, and Frances Wicher, U.S. EPA Region 9. May 15, 2017. With included attachments, responses to NOD General Comment #1, Specific Comments #8-39, GSU Memorandum Specific Comments #4-6. With separate attachment:
      - (i) Example Analytic Results. Curtis and Tompkins. [REDACTED for posting on regulations.gov]
      - (ii) Example 10.1: Manifest: NH30283117 [REDACTED]
      - (iii) Example 10.2: Manifest: 016881648JJK [REDACTED]
      - (iv) Example 10.3: Manifest: 016123755JJK [REDACTED]
  - (2) TSCA Submittal
    - (a) “Chemical Waste Management, Inc. – Kettleman Hills Facility Revised TSCA Permit Renewal Application.” Reyna Verdin, Chemical Waste Management, Inc. to Frances Wicher, U.S. EPA Region 9. May 15, 2017.
    - (b) “TSCA Permit Renewal Application, Chemical Waste Management, Inc. Kettleman Hills Facility.” Chemical Waste Management, Inc., Revision 0: May 15, 2017. With included appendices and attachments.
- f. Sixth Incremental Submittal
- (1) “Chemical Waste Management, Inc. – Kettleman Hills Facility Revised TSCA Permit Renewal Application – Revision 1.” Reyna Verdin, Chemical





- Waste Management, Inc. to Frances Wicher, U.S. EPA Region 9. July 13, 2017.
- (2) “TSCA Permit Renewal Application, Chemical Waste Management, Inc. Kettleman Hills Facility.” Chemical Waste Management, Inc., Revision 0: May 15, 2017. With included appendices and attachments.
  - (3) “Hazardous Waste Facility Permit Renewal Application, Operation Plan, Chemical Waste Management, Inc. Kettleman Hills Facility.” Chemical Waste Management, Inc. Revision 2: July 15, 2017. [REDACTED for posting on regulations.gov]
  - (4) “Hazardous Waste Facility Permit Renewal Application, Operation Plan, Chemical Waste Management, Inc. Kettleman Hills Facility.” Chemical Waste Management, Inc. Revision 2: July 15, 2017 (redline). [REDACTED for posting on regulations.gov]
  - (5) “Site-Specific Water Quality and Soil-Gas Monitoring Plan 2017 Class I Waste Management Units – Kettleman Hills Facility, Kings County, California.” Amec Foster Wheeler Environment & Infrastructure, Inc. July 12, 2017.
  - (6) “Engineering Feasibility Study 2017 Class I Waste Management Units, Kettleman Hills Facility, Kings County, California. Amec Foster Wheeler Environment & Infrastructure, Inc. July 12, 2017.

## **B. 2017 U.S. EPA NOTICE OF DEFICIENCY AND RESPONSE**

### **1. 2017 U.S. EPA NOD**

- a. “KHF Update.” Email, Bob Henry, Chemical Waste Management, Inc. to Frances Wicher, U.S. EPA Region 9. August 10, 2017.
- b. “U.S. EPA-IX Conference Call November 1, 2017.” Email, Bob Henry, Chemical Waste Management, Inc. to Frances Wicher, U.S. EPA Region 9. October 27, 2017.
- c. Letter, Barbara Gross, U.S. EPA Region 9, to Reyna Verdin, Chemical Waste Management, Inc. December 21, 2017. With enclosure:
  - (1) “Notice of Deficiency, TSCA Permit Renewal Application (dated July 1, 2017), Chemical Waste Management, Inc. – Kettleman Hills Facility, EPA ID. NO CAT 000 646 117.” U.S. EPA Region 9. December 21, 2017.

### **2. Response to 2017 U.S. EPA NOD**

- a. “Chemical Waste Management, Inc. – Kettleman Hills Facility Re: TSCA Permit Renewal Application, Revision 1: July 15, 2017.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Frances Wicher, U.S. EPA Region 9. February 14, 2018.
- b. “Chemical Waste Management, Inc. – Kettleman Hills Facility Re: Sufficiency of Groundwater Monitoring Program.” Letter, Reyna Verdin, Chemical Waste



- Management, Inc. to Ryan Batty, Department of Toxic Substances Control. February 17, 2018. With enclosure: “Sufficiency of Groundwater Monitoring Program.” AMEC Foster Wheeler. February 7, 2018
- c. “Closure and Post-Closure Plans, Kettleman Hills Facility, Kings County, California.” Golder Associates, Inc. March 15, 2018.
  - d. “Hazardous Waste Facility Permit Renewal Application, Operation Plan, Chemical Waste Management, Inc. Kettleman Hills Facility.” Chemical Waste Management, Inc. Revision 3: March 16, 2018. [REDACTED for posting on regulations.gov]
  - e. “Hazardous Waste Facility Permit Renewal Application, Operation Plan, Chemical Waste Management, Inc. Kettleman Hills Facility.” Chemical Waste Management, Inc. Revision 3: March 16, 2018 (redlined). [REDACTED for posting on regulations.gov]
  - f. “First Notice of Deficiency for TSCA Permit Renewal Application, Chemical Waste Management, Inc. – Kettleman Hills Facility, EPA ID. NO CAT 000 646 117 (Response to Comments).” Chemical Waste Management, Inc. April 2018. [REDACTED for posting on regulations.gov].
  - g. “Chemical Waste Management, Inc. – Kettleman Hills Facility Revised TSCA Permit Renewal Application – Revision 2.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Frances Wicher, U.S. EPA Region 9. April 19, 2018.
  - h. “TSCA Permit Renewal Application, Chemical Waste Management, Inc. Kettleman Hills Facility.” Chemical Waste Management, Inc., Revision 2: April 20, 2018.
  - i. “TSCA Permit Renewal Application, Chemical Waste Management, Inc. Kettleman Hills Facility.” Chemical Waste Management, Inc., Revision 2: April 20, 2018 (redlined).

## **C. 2018 U.S. EPA REQUEST FOR INFORMATION**

### **1. 2018 Request for Information**

- a. “Memorandum to File (CAT 000 646 117 Chemical Waste Management, Inc. TSCA Approval), Subject: September 7, 2018 Call with Chemical Waste Management, Inc. Kettleman Hills Facility.” Frances Wicher, U.S. EPA Region 9. September 17, 2018.

### **2. Response to 2018 Request for Information Response**

- a. “Chemical Waste Management, Inc. – Kettleman Hills Facility Revised TSCA Permit Renewal Application – Revision 3.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Frances Wicher, U.S. EPA Region 9. October 2, 2018.
- b. “TSCA Permit Renewal Application, Chemical Waste Management, Inc. Kettleman Hills Facility.” Chemical Waste Management, Inc., Revision 3: October 2, 2018.



- c. “TSCA Operation Plan, Landfill B-18 Phases I, II, and III; PCB Building and Outside Containment Area.” Chemical Waste Management, Inc., Revision 3: October 1, 2018.
- d. “TSCA Permit Renewal Application, Chemical Waste Management, Inc. Kettleman Hills Facility.” Chemical Waste Management, Inc., Revision 3: October 2, 2018 (redlined).
- e. “TSCA Operation Plan, Landfill B-18 Phases I, II, and III; PCB Building and Outside Containment Area.” Chemical Waste Management, Inc., Revision 3: October 1, 2018 (redlined).
- f. “Engineer’s Certification for the Outside Containment System for the PCB Flushing/Storage Unit at the Kettleman Hills Facility – Kings County, California (EPA ID NO.: CAT000646117).” Ryan Hillman, Golder Associates, Inc. to Reyna Verdin, Chemical Waste Management, Inc., October 1, 2018.
- g. “Engineer’s Certification for the Interior Containment System for the PCB Flushing/Storage Unit at the Kettleman Hills Facility – Kings County, California (EPA ID NO.: CAT000646117).” Ryan Hillman, Golder Associates, Inc. to Reyna Verdin, Chemical Waste Management, Inc., October 1, 2018.
- h. “Business Confidential - Percentage TSCA Disposal to Total Disposal 2002-2017.” Chemical Waste Management, Inc., October 2, 2019. [Confidential Business Information]
- i. “Closure and Post-Closure Plans, Kettleman Hills Facility, Kings County, California.” Golder Associates, Inc. March 15, 2018.
- j. “Chemical Waste Management, Inc. – Kettleman Hills Facility Revised Site-Specific Groundwater Monitoring Plan Revised site-specific Unsaturated Zone Monitoring Plan.”, Letter, Paul E. Turek, Chemical Waste Management, Inc. to Regional Water Quality Control Board. April 15, 2014. With enclosure: “Revised Site-Specific Groundwater Monitoring Plan Class I Waste Management Units, Kettleman Hills Facility, Kings County, California.” AMEC Environment & Infrastructure, Inc. April 14, 2014.
- k. “Notifications correspondence from KHF to EPA-IX for PCB detections in groundwater monitoring results and leachate analytic results for TSCA-regulated units from 1992 – 2018. Compiled by Chemical Waste Management, Inc. October 2, 2018.
- l. “In the Matter of Certifying the Final Subsequent Environmental Impact Report for the Kettleman Hills Facility B-18/B-20 Hazardous Waste Disposal Project, Resolution No. 09-12.” Kings County Planning Commission. October 19, 2009.
- m. “In the Matter of Approving Conditional Use Permit Application Number CUP 05-10 And Adopting the CEQA Findings ff Fact and a Statement ff Overriding Considerations, Adopting the Mitigation Monitoring Plan, and Adopting the Conditions of Approval for the Kettleman Hills Facility B-18/B-20 Hazardous



Waste Disposal Project, Resolution No. 09-13.” Kings County Planning Commission. October 19, 2009.

**D. 2019 U.S. EPA REQUESTS FOR INFORMATION AND RESPONSE**

1. “CWM-KHF Information Request.” Email, Reyna Verdin, Chemical Waste Management, Inc. to Frances Wicher, U.S. EPA Region 9. July 15, 2019.
2. “CWM-KHF Information Request.” Email, Reyna Verdin, Chemical Waste Management, Inc. to Frances Wicher, U.S. EPA Region 9. July 18, 2019.
3. “July 3, 2019 Call with Chemical Waste Management, Inc. Kettleman Hills Facility.” Memorandum, Frances Wicher, U.S. EPA to File (CAT 000 646 117 Chemical Waste Management, Inc. TSCA Approval). July 24, 2019.

**E. PRE-2016 U.S. EPA NOTICES OF DEFICIENCIES AND RESPONSES**

1. Letter, Paula Bisson, U.S. EPA Region 9, to Paul Turek, Chemical Waste Management, Inc. June 4, 1999. With enclosure “Information Needed to Review the Application for Renewal of TSCA Approval at the CWMI Kettleman Hills Facility.”
2. “Chemical Waste Management, Inc. – Kettleman Hills Facility Response to TSCA Permit Renewal Questions.” Letter, Paul Turek, Chemical Waste Management, Inc. to Paula Bisson, U.S. EPA Region 9. July 7, 1999. With enclosures.
3. “Information Request #2 for Data Relevant to the Renewal of TSCA Approvals – CWMI Kettleman Hills Facility.” Letter, Paula Bisson, U.S. EPA Region 9, to Paul Turek, Chemical Waste Management, Inc. September 16, 1999. With enclosure “Information Request #2 for Review the Application for Renewal of TSCA Approval at the CWMI Kettleman Hills Facility.”
4. “Chemical Waste Management, Inc. – Kettleman Hills Facility Response to TSCA Permit Renewal Information Request #2.” Letter, Paul Turek, Chemical Waste Management, Inc. to Paula Bisson, U.S. EPA Region 9. October 11, 1999. With enclosures.
5. “Information Request #3 for Data Relevant to the Renewal of TSCA Approvals – CWMI Kettleman Hills Facility.” Letter, Paula Bisson, U.S. EPA Region 9, to Paul Turek, Chemical Waste Management, Inc. December 16, 1999. With enclosure “Information Request #3 for Review the Application for Renewal of TSCA Approval at the CWMI Kettleman Hills Facility.”
6. “Chemical Waste Management, Inc. – Kettleman Hills Facility Response to TSCA Permit Renewal Information Request #3.” Letter, Paul Turek, Chemical Waste Management, Inc. to Paula Bisson, U.S. EPA Region 9. January 10, 2000. With enclosures.
7. “Amendment of reference documents submitted for the renewal of TSCA approvals.” Letter, Paula Bisson, U.S. EPA Region 9, to Paul Turek, Chemical Waste Management, Inc. March 14, 2000.



8. “Chemical Waste Management, Inc. – Kettleman Hills Facility Response to TSCA Permit Renewal Information Request #5.” Letter, Paul Turek, Chemical Waste Management, Inc. to Paula Bisson, U.S. EPA Region 9. March 22, 2000.
9. “March 14, 2000 Request for Amendment of Reference Documents.” Letter, Paula Bisson, U.S. EPA Region 9, to Paul Turek, Chemical Waste Management, Inc. May 19, 2000.
10. “Chemical Waste Management, Inc. – Kettleman Hills Facility Response to TSCA Permit Renewal Information Request #5.” Letter, Paul Turek, Chemical Waste Management, Inc. to Paula Bisson, U.S. EPA Region 9. June 8, 2000.
11. “TSCA approval.” Email, Max Weintraub, U.S. EPA to Paul Turek, Chemical Waste Management, Inc. November 27, 2000.
12. “Chemical Waste Management, Inc. – Kettleman Hills Facility Response to TSCA Permit Renewal Information Request #6.” Letter, Paul Turek, Chemical Waste Management, Inc. to Max Weintraub, U.S. EPA Region 9. December 4, 2000.
13. “Application for Renewal of TSCA Approval” Letter, Paula Bisson, U.S. EPA Region 9, to Paul Turek, Chemical Waste Management, Inc. April 4, 2001.
14. “Chemical Waste Management, Inc. – Kettleman Hills Facility Response to TSCA Permit Renewal Information Request #7.” Letter, Paul Turek, Chemical Waste Management, Inc. to Max Weintraub, U.S. EPA Region 9. May 11, 2001. With enclosures.
15. “Closure of TSCA Units” Letter, Paula Bisson, U.S. EPA Region 9, to Paul Turek, Chemical Waste Management, Inc. December 5, 2002.
16. “Chemical Waste Management, Inc. – Kettleman Hills Facility Response to TSCA Permit Renewal Information Request #8.” Letter, Paul Turek, Chemical Waste Management, Inc. to Max Weintraub, U.S. EPA Region 9. January 21, 2003.
17. “Chemical Waste Management, Inc. – Kettleman Hills Facility Response to TSCA Permit Renewal Information Request #8.” Letter, Paul Turek, Chemical Waste Management, Inc. to Max Weintraub, U.S. EPA Region 9. April 11, 2003.
18. “U.S. EPA (“U.S. EPA”) Completeness Review of Chemical Waste Management, Inc. – Kettleman Hills Facility Request to Modify Toxic Substances Control Act (“TSCA”) Polychlorinated Biphenyl (“PCB”) Coordinated Approval Request for Landfill Unit B-18 (Phase III).” Letter, Cheryl Nelson, U.S. EPA to Paul Turek, Chemical Waste Management, Inc. November 25, 2009. With enclosure “U.S. EPA Completeness Review Comments (Engineering) Chemical Waste Management, Inc. Kettleman Hills Facility Request to Modify TSCA PCB Coordinated Approval Request (June 26, 2009) for Landfill Unit B-18 (Phase III). November 25, 2009.
19. “Completeness Review Comments – Request to Modify TSCA PCB Coordinated Approval Request for Landfill B-18.” Email, Edwin Poalinelli, U.S. EPA to Paul Turek, Chemical Waste Management. December 15, 2009 (a).



20. “Completeness Review Comments – Request to Modify TSCA PCB Coordinated Approval Request for Landfill B-18.” Email, Edwin Poalinelli, U.S. EPA to Paul Turek, Chemical Waste Management. December 15, 2009 (b).
21. “Completeness Review Comments – Request to Modify TSCA PCB Coordinated Approval Request for Landfill B-18.” Email, Edwin Poalinelli, U.S. EPA to Paul Turek, Chemical Waste Management. December 15, 2009 (c).
22. “Chemical Waste Management, Inc. – Kettleman Hills Facility Response to Landfill B-18 Phase III Coordinated Approval Completeness Review.” Letter, Paul E. Turek, Chemical Waste Management, Inc. to Chip Poalinelli, U.S. EPA Region 9. December 22, 2009. With enclosures 1-4 included in file. Additional Attachments:
23. “Response to Comments, U.S. EPA Completeness Review of Chemical Waste Management, Inc. Kettleman Hills Request o Modify TSCA PCB Coordinated Approval Request for Landfill Unit B-18 (Phase III).” Golder Associates, Inc. December 17, 2009.
24. “Site Specific Groundwater Monitoring Plan, Kettleman Hills Facility, Kings County, California.” GeoSyntec Consultants. May 2001.
25. “Hydrogeologic Characterization, Kettleman Hills Facility, Kings County, California.” EMCON Associates. December 1986.
26. “Surface Water Control Program for Kettleman Hills Facility,” Centra Consulting, Inc. October 23, 2009.
27. “State Siting Criteria Equivalency Assessment for Chemical Waste Management’s Inc. Kettleman Hills Facility.” Meredith/Boli & Associates, Inc. October 28, 1985.
28. “Transmittal of Adopted Waste Discharge Requirements for Chemical Waste Management, Inc., Kettleman Hills Facility, Kings County.” Letter, William F. Pfister, California Regional Water Quality Control Board Central Valley Region to Robert g. Henry, Chemical Waste Management, Inc. March 11, 1998. With enclosure: “Order No. 98-058, Waste discharge Requirements for Chemical Waste Management, Inc. Kettleman Hills Facility, Kings County.” California Regional Water Quality Control Board Central Valley Region. February 27, 1998.
29. “Completeness Review – Clarification.” Email, Edwin Poalinelli, U.S. EPA Region 9, to Paul Turek, Chemical Waste Management, Inc. February 9, 2010. With attachment.
30. “Chemical Waste Management, Inc. – Kettleman Hills Facility Revised Initial Report, Omission from Response to Landfill B-18 Phase III Coordinated Approval Completeness Review.” Letter, Paul E. Turek, Chemical Waste Management, Inc. to Chip Poalinelli, U.S. EPA Region 9. February 18, 2010. With enclosure: “Initial Report, TSCA Approval Request, Chemical Waste Management, Inc. Kettleman Hills Facility, Landfill Unit B-18, Phase I, II, and III.” Chemical Waste Management, Inc. February 17, 2010. With enclosure:
  - a. “Surface Water Control Program for Kettleman Hills Facility,” Centra Consulting, Inc. October 23, 2009.





31. “Chemical Waste Management, Inc. – Kettleman Hills Facility Re: Notice of Violation – EPA I.D. Number CAT000646117.” Letter, Paul Turek, Chemical Waste Management, Inc. to Christopher Rollins, U.S. EPA Region 9. May 10, 2010.
32. “Chemical Waste Management, Inc. Kettleman Hills Facility, Information Request Regarding B-18 Capacity and Surveying.” Letter, Robert Henry, Chemical Waste Management, Inc. to Christopher Rollins, U.S. EPA Region 9, October 15, 2010. With enclosures (REDACTED).
33. “Notice of Deficiency (“NOD”) for Toxic Substances Control Act (“TSCA”) Permit Renewal and Modification Applications dated April 1, 1997, as revised and May 10, 2010; Chemical Waste Management Kettleman Hills Facility (CAT 000646117).” Letter, Caleb Shaffer, U.S. EPA Region 9, to Bob Henry, Chemical Waste Management, Inc. September 22, 2011. With enclosure “Notice of Deficiency – Attachment A Chemical Waste Management (“CWM”) Inc., Kettleman Hills, California – July 1, 1997/May 10, 2010 (Request for a Coordinated Polychlorinated Biphenyl (“PCB”) Approval) Toxic substances Control Act Permit Application (“TSCA Application”) Kettleman Hills Facility, 35251 Old Skyline Road, Kettleman City, California (the “Facility”).
34. “Call re Kettleman Hills NOD.” Email, Andrew M. Kenefick, Chemical Waste Management, Inc. to Edwin Poalinelli, U.S. EPA Region 9. November 17, 2011.
35. “Chemical Waste Management, Inc. – Kettleman Hills Facility Response to Notice of Deficiency – TSCA Permit Renewal and Modification.” Letter, Paul Turek, Chemical Waste Management, Inc. to Edwin Poalinelli, U.S. EPA Region 9. November 21, 2011 with Attachments:
36. “Chemical Waste Management, Inc. – Kettleman Hills Facility (KHF), EPA-IX Notice of Deficiency for TSCA Permit Renewal and Modification Applications – Attachment A, dated September 22, 2011.” Chemical Waste Management, Inc. (November 21, 2011);
37. “TSCA Application – Supplemental Information.” Chemical Waste Management, Inc. (November 21, 2011);
38. “Initial Report, TSCA Approval Request, Chemical Waste Management, Inc. Kettleman Hills Facility, Landfill Unit B-18, Phase I, II, and III.” Chemical Waste Management, Inc. November 21, 2011
39. “TSCA Operation Plan, landfill Unit B-18, Phases I, II, and III, Kettleman Hills Facility, Chemical Waste Management, Inc.” Chemical Waste Management, Inc. November 21, 2011.
40. “Site Specific Groundwater Monitoring Plan, Kettleman Hills Facility, Kings County, California.” GeoSyntec Consultants. May 2001.
41. “Chemical Waste Management, Inc. – Kettleman Hills Facility TSCA Permit Renewal – Supplemental Information.” Letter, Paul Turek, Chemical Waste Management, Inc. to Edwin Poalinelli, U.S. EPA Region 9. March 8, 2013. With enclosure.



42. “U.S. EPA Evaluation of TSCA Renewal/Modification Application for Landfill Unit B-18, Supplemental Information, dated March 8, 2013. EPA ID CAT000646117.” Letter, Caleb Shaffer, U.S. EPA to Bob Henry, Chemical Waste Management, Inc. March 22, 2013.
43. “TSCA Supplemental Information – NOD 3/23/13 Response.” Spreadsheet, Chemical Waste Management. March 27, 2013.
44. “Poly-Air Activated Carbon Vent Filters.” Rex-Bac-T Technologies. Undated.
45. “Kettleman Hills Facility – PCB Building Secondary Containment Volume.”: Scott Summer, P.E.” Chemical Waste Management, Inc. February 8, 2012.
46. “Kettleman Hills Facility – PCB Building Secondary Containment Volume.”: Scott Summer, P.E.” Chemical Waste Management, Inc. May 17, 2012.

**F. DEPARTMENT OF TOXIC SUBSTANCES CONTROL NOTICES OF DEFICIENCIES AND RESPONSES**

1. Department of Toxic Substances Control First Notice of Deficiency (November 2016) – see Section VI.A. for response documents
  - a. “Notice of Deficiency for the Permit Renewal Application for the Chemical Waste Management, Inc., Kettleman Hills Facility Hazardous Waste Facility, 35251 Old Skyline Road, Kettleman City, Kings County, California, 93239, Environmental Protection Agency Identification Number: CAT000646117.” Ryan Batty, Department of Toxic Substances Control to Bob Henry, Chemical Waste Management, Inc. November 18, 2016.
2. Department of Toxic Substances Control Second Notice of Deficiency (November 2017) and Response
  - a. Department of Toxic Substances Control Second Notice of Deficiency
    - (1) “Second Notice of Deficiency for Revised Permit Renewal Application for the Chemical Waste Management, Inc., Kettleman Hills Facility Hazardous Waste Facility, 35251 Old Skyline Road, Kettleman City, California, Environmental Protection Agency Identification Number: CAT000646117.” Ryan Batty, Department of Toxic Substances Control to Bob Henry, Chemical Waste Management, Inc. November 6, 2017. With enclosures:
      - (a) “Second Notice of Deficiency Chemical Waste Management, Inc. Kettleman Hills Facility EPA ID. NO.: CAT 000 646 117.” Department of Toxic Substances Control. November 6, 2017.
      - (b) “Used Oil Testing Language.” Department of Toxic Substances Control. November 6, 2017. Attachment to Second Notice of Deficiency Chemical Waste Management, Inc. Kettleman Hills Facility.
      - (c) “Review of the Closure and Post-Closure Cost Estimate for Financial Assurance, Chemical Waste Management Kettleman Hills Facility CAT000646117 (Site Code 100032-33).” Memorandum, William



- Kilgore, Department of Toxic Substances Control to Ryan Batty, Department of Toxic Substances Control. October 26, 2017.
- (d) “Part B Permit Renewal Application, Chemical Waste Management Kettleman Hills Facility, Kings County, California, Project No. 25040/100032-33/20042986.” Memorandum, Matthew Farris and Jeff Brown, Department of Toxic Substances Control to Ryan Batty, Department of Toxic Substances Control. November 6, 2017.
- (e) “Review of Hazardous Waste Facility Permit Renewal Application Operation Plan and Closure and Post-Closure Plans, Kettleman Hills Facility CAT000646117 (Site Code 100032-33).” Memorandum, Peter Gathungu, Department of Toxic Substances Control to Ryan Batty, Department of Toxic Substances Control. November 6, 2017.
- b. Second Department of Toxic Substances Control Notice of Deficiency Response
- (1) “Second Notice of Deficiency for Chemical Waste Management, Inc. – Kettleman Hills Facility, EPA ID NO. CAT 000646117.” Chemical Waste Management, Inc. March 16, 2017
- (2) “Hazardous Waste Facility Permit Renewal Application, Operation Plan, Chemical Waste Management, Inc. Kettleman Hills Facility.” Chemical Waste Management, Inc. Revision 3: March 16, 2018. [REDACTED for posting on regulations.gov]
- (3) “Hazardous Waste Facility Permit Renewal Application, Operation Plan, Chemical Waste Management, Inc. Kettleman Hills Facility.” Chemical Waste Management, Inc. Revision 3: March 16, 2018 (redline). [REDACTED for posting on regulations.gov]
- (4) “Chemical Waste Management, Inc. – Kettleman Hills Facility Re: Sufficiency of Groundwater Monitoring Program.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Ryan Batty, Chemical Waste Management, Inc. February 17, 2018.
- (5) “Sufficiency of Groundwater Monitoring Program, Kettleman Hills Facility, Kings County, California.” AMEC Foster Wheeler. February 7, 2018.
- (6) “Chemical Waste Management, Inc. – Kettleman Hills Facility Re: Ambient Air Monitoring Plan – Technical Memorandum for Proposed Ambient Air Increase Criteria & Detection Monitoring Plan Approach.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Camille Rogado, Department of Toxic Substances Control. March 26, 2019. With enclosure:
- (a) “Proposed Ambient Air Increase Criteria & Detection Monitoring Plan Approach.” Technical Memo, Halley H. Roberts, Wenck to Reyna Verdin, Chemical Waste Management, Inc. March 25, 2019.
3. Department of Toxic Substances Control Third Notice of Deficiency (March 2019)
- a. “Third Notice of Deficiency for Revised Permit Renewal Application for the Chemical Waste Management, Inc., Kettleman Hills Facility Hazardous Waste



Facility, 35251 Old Skyline Road, Kettleman City, California, Environmental Protection Agency Identification Number: CAT000646117.” Ryan Batty, Department of Toxic Substances Control to Bob Henry, Chemical Waste Management, Inc. March 29, 2019.

- (1) “Third Notice of Deficiency Chemical Waste Management, Inc. Kettleman Hills Facility EPA ID. NO.: CAT 000 646 117.” Department of Toxic Substances Control. March 29, 2019.
  - (2) “Technical Completeness Checklist.” Department of Toxic Substances Control. March 26, 201. Attachment to Third Notice of Deficiency Chemical Waste Management, Inc. Kettleman Hills Facility.
  - (3) “Review of the Closure and Post-Closure Cost Estimate for Financial Assurance (March 2018), Chemical Waste Management Kettleman Hills Facility, Kings County, California (Site Code: DTSC100032-33).” Memorandum, Perry Myers, Department of Toxic Substances Control to Ryan Batty, Department of Toxic Substances Control. February 12, 2019.
  - (4) “2018 Engineering Feasibility Study, Chemical Waste Management Kettleman Hills Facility, Kings County, California, Project No. 25040/100032-33/20042986.” Memorandum, Jeff Brown, Department of Toxic Substances Control to Ryan Batty, Department of Toxic Substances Control. March 4, 2019.
  - (5) “Review of Hazardous Waste Facility Permit Renewal Application Operation Plan, and Closure and Post-Closure Plans, Kettleman Hills Facility, Kings County, California (Site Code: DTSC100032-33).” Memorandum, Peter Gathungu, Department of Toxic Substances Control to Ryan Batty, Department of Toxic Substances Control. February 20, 2019.
- b. “Chemical Waste Management, Inc. – Kettleman Hills Facility Re: Ambient Air Monitoring Plan – Technical Memorandum for Proposed Diesel Particulate Matter Air Dispersion Modeling Analysis.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Raminder Bola, Department of Toxic Substances Control. June 27, 2019. With enclosure: “Kettleman Hills Facility Diesel Particulate Matter Air Dispersion Modeling Analysis.” Technical Memo, Charlene Becka, Wenck to Reyna Verdin, Chemical Waste Management, Inc. June 25, 2019.
  - c. “CWM-KHF – Proposed Diesel Particulate Matter Air Dispersion Analysis.” Email, Camille Rogado, Department of Toxic Substances Control to Reyna Verdin, Chemical Waste Management, Inc. July 2, 2019.
  - d. “Request for a Response Extension for the Third Notice Of Deficiency for the Permit Renewal Application for The Chemical Waste Management, Inc., Kettleman Hills Facility Hazardous Waste Facility, 35251 Old Skyline Road, Kettleman City, Kings County, California, 93239, Environmental Protection Agency Identification Number: CAT000646117.” Letter, Reyna Verdin,



Chemical Waste Management, Inc. to Raminder Bola, Department of Toxic Substances Control. July 3, 2019.

- e. Approval of Extension Request for Third Notice of Deficiency for Permit Renewal Application, Chemical Waste Management, Inc.- Kettleman Hills Facility, Kings County, California (EPA ID NO. CAT 000 646117). Letter, Raminder Bola, Department of Toxic Substances Control to Reyna Verdin, Chemical Waste Management, Inc. July 16, 2019.

## **VII. KETTLEMAN HILL FACILITY OPERATION DOCUMENTS**

### **A. HAZARDOUS WASTE OPERATION PLAN**

1. “Operation Plan, Chemical Waste Management, Inc. Kettleman Hills Facility.” Chemical Waste Management, Inc. June 16, 2003.
2. “Class 3 Permit Modification Request, 22 CCR 66270.42(c) Landfill B-18 Phase III Expansion.” Letter, Carol J. Carollo, Chemical Waste Management, Inc. to Ruth Cayabyab, Department of Toxic Substances Control. December 12, 2008. With enclosure: “Markup Copes of [Operation Plan] Pages with Changes.”; “Clean Copies of Affected Text in Application.”;

### **B. NON-TSCA KETTLEMAN HILLS FACILITY PERMITS**

1. “In the Matter of Certifying the Final Subsequent Environmental Impact Report for the Kettleman Hills Facility B-18/B-20 Hazardous Waste Disposal Project, Resolution No. 09-12.” Kings County Planning Commission. October 19, 2009.
2. “In the Matter of Approving Conditional Use Permit Application Number CUP 05-10 And Adopting the CEQA Findings of Fact and a Statement of Overriding Considerations, Adopting the Mitigation Monitoring Plan, and Adopting the Conditions of Approval for the Kettleman Hills Facility B-18/B-20 Hazardous Waste Disposal Project, Resolution No. 09-13.” Kings County Planning Commission. October 19, 2009.
3. “Order R5-2014-0003 Waste Discharge Requirements for Chemical Waste Management, Inc. Class I/II Waste Management Units Kettleman Hills Facility Kings County.” Central Valley Regional Water Control Board. January 16, 2014.
4. “Hazardous Waste Facility Permit – Chemical Waste Management, Inc. Kettleman Hills Facility (Permit Number: 02-SAC-03).” Department of Toxic Substances Control. Effective June 16, 2003 (modified May 5, 2005, July 25, 2006, September 21, 2007, and May 21, 2014).
5. “Authority to Construct Permit No: C-283-11-6.” San Joaquin Valley Air Pollution Control District. Expiration Date: May 23, 2014.
6. “Permit to Operate C-283-0-3.” San Joaquin Valley Air Pollution Control District. Expiration Date: August 31, 2022.



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**C. LANDFILL CLOSURE AND POST-CLOSURE REPORTS****1. Landfill B-14 Closure and Post-Closure Documents**

- a. “Kettleman Hills Facility B-14 Closure Certification DHS Permit Condition IV.D.2.e.” Letter, Christopher Hansen, Chemical Waste Management, Inc. to Section Chief Northern California Section Department of Health Services Toxic Substance Control Division. April 13, 1988.
- b. “Kettleman Hills Facility, I.D. CAT 000646117 – Landfill B-14 Record of Survey and Record of Wastes.” Letter, Christopher W. Hansen, Chemical Waste Management, Inc. to Regional Administrator, U.S. EPA Region 9. May 10, 1989.
- c. “Landfill B-14 Post-Closure Inspection Kettleman Hills Facility.” Woodward-Clyde Consultants. November 1, 1991.
- d. “Post-Closure Inspection Landfill Unit B-14, Kettleman Hills Facility.” TRC. October 2001.
- e. “Chemical Waste Management, Inc. – Kettleman Hills Facility Decommissioning Plan for Landfill B-14 Sounding Wells.” Letter, Paul Turek, Chemical Waste Management, Inc. to Max Weintraub, U.S. EPA Region 9. January 19, 2006.
- f. “Decommissioning Landfill Unit B-14 Sounding Wells.” Letter, Adrienne Prisela, U.S. EPA Region 9, to Paul Turek, Chemical Waste Management, Inc. August 28, 2008.

**2. Landfill B-16 Closure and Post – Closure Documents**

- a. “Construction Specification, Chemical Waste Management, Inc., Kettleman Hills Class I Disposal Site, Kings County, CA.” Burial Area 16, PCB Disposal Facility.” Chemical Waste Management, Inc. June 1982.
- b. “Closure Plan for Landfill B-16 Kettleman Hills Facility, Kettleman City, California DHS Permit Condition IV.D.6.d.” Letter, Michael Cranston, Chemical Waste Management, Inc. to Director Hazardous Waste Management Division, U.S. EPA Region 9. August 27, 1990.
- c. “Kettleman Hills Facility CAT 000 646 117, Landfill Capacity.” Letter, Carol Carollo, Chemical Waste Management, Inc. to William Veile, Department of Toxic Substances Control. October 14, 1992.
- d. “Kettleman Hills Facility CAT 000 646 117 Updated Status and Request for Revised Schedule Approval, Facility Closure Construction Project.” Letter, Michael Cranston, Chemical Waste Management, Inc. to Director Hazardous Waste Management Division, U.S. EPA Region 9. March 10, 1993.
- e. “Closure Plan for Landfill B-16, Kettleman Hills Facility, Kettleman City, California, Revision 1, Final Report to Chemical Waste Management, Inc.” Golder Associates, March 11, 1993.
- f. “Landfill B-16 Closure Schedule Chemical Waste Management, Inc – Kettleman Hills Facility (CAT00646117).” Letter, Kamal Azzam, Chemical Waste





- Management, Inc. to Permitting Branch Region 1, Department of Toxic Substances Control. September 5, 1996.
- g. “Updated Facility Closure Status and Schedule Chemical Waste Management, Inc. Kettleman Hills Facility.” Letter, Kamal Azzam, Chemical Waste Management, Inc. to Permitting Branch Region 1, Department of Toxic Substances Control, August 21, 1997.
  - h. “TSCA Capacity for B-16.” Letter, Paula Bisson, U.S. EPA Region 9, to Paul Turek, Chemical Waste Management, Inc. August 13, 1999.
  - i. “Chemical Waste Management, Inc. – Kettleman Hills Facility Response to TSCA Capacity for B-16.” Letter, Paul Turek, Chemical Waste Management, Inc. to Paula Bisson, U.S. EPA Region 9. September 3, 1999.
  - j. “Landfill B-16 Closure Approval Cover System Slope Stability Analysis.” Letter, Carol Carollo, Chemical Waste Management, Inc., to Max Weintraub, U.S. EPA Region 9. January 15, 2004.
  - k. “Chemical Waste Management, Inc. – Kettleman Hills Facility Landfill B-16 Closure Project” Letter, Carol Carollo, Chemical Waste Management, Inc., to Max Weintraub, U.S. EPA Region 9. March 12, 2004.
  - l. “Requested Information on Landfill B-16 LCRS Sump.” Letter, Paul Turek, Chemical Waste Management Inc. to Max Weintraub, U.S. EPA Region 9. June 1, 2004.
  - m. “Construction Quality Assurance Report on Final Closure of Landfill B-16 Kettleman Hills Facility.” Golder Associates, Inc. December 2004.
  - n. “Landfill Unit B-16 Closure Construction Certification Report DTSC Permit V.5(A) and 22 CCR 66264.115, WDR Provisions C.7., 23 CCR 2590(c)(6).” Letter, Fred Paap and Carol Carollo, Waste Management, Inc. to Janice Yonekura, Department of Toxic Substances Control; Jim Dowdall, Regional Water Quality Control Board; and Max Weintraub, U.S. EPA Region 9. December 15, 2004.
  - o. “Chemical Waste Management, Inc. – Kettleman Hills Facility Landfill Unit B—16 Closure Construction Certification Report.” Letter, James Dowdall and Shelton Gray, Regional Water Quality Control Board, to Fred Paap and Carol Carollo, Chemical Waste Management, Inc. February 15, 2005.
  - p. “Landfill Unit B-16 Closure Construction Certification Report Response to RWQCB Comments and Report Revision Letter, Fred Paap and Carol Carollo, Chemical Waste Management, Inc. to Janice Yonekura, Department of Toxic Substances Control; Jim Dowdall, Regional Water Quality Control Board; and Max Weintraub, U.S. EPA Region 9. March 16, 2003.
  - q. “Revised Text – Construction Quality Assurance Report on Final Closure of Landfill B-16 Kettleman Hills Facility.” Golder Associates, Inc. December 2004 Revised March 2005.



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- r. “Closure Certification Acknowledgement for the Landfill Unit B-16 Chemical Waste Management, Inc, Kettleman Hills Facility Kettleman California, US EPA ID Number CAT000646117.” Letter, James Pappas, Department of Toxic Substances to Paul Turek, Chemical Waste Management, Inc. June 30, 2005.
3. Landfill B-19 Closure and Post-Closure Documents
- a. “Begin Construction of the Initial Phare of Landfill B-19 Class II/III and Closure of the Existing Landfill B-19 Class I. Chemical Waste Management, Inc. – Kettleman Hills Facility CAT 000 646 117.” Letter, Kamal Azzam, Chemical Waste Management, Inc. to Shelton Gray, Regional Water Quality Control Board and William Veile, Department of Toxic Substances Control. July 8, 1998.
- b. “Notice of Decision to Approve of Landfill Unit B-19 Modified Closure Plan, September 1998.” Department of Toxic Substances Control. September 1998.
- c. “Final Closure Certification Statements for the Landfill Unit B-19 Class I Partial Closure. Chemical Waste Management, Inc. – Kettleman Hills Facility CAT 000 646 117.” Letter, Kamal Azzam, Chemical Waste Management, Inc. to John McCarroll, U.S. EPA Region 9; Department of Toxic Substances Control; and, Regional Water Quality Control Board. December 30, 1998.
- d. “Chemical Waste Management, Incorporated (CWMI) Kettleman Hills Facility, Kings County, EPA I.D. #CAT 000 646 117, Certification of Closure for the Landfill B-19.” Letter, Robert Crandell, Department of Toxic Substances Control to Robert Henry, Chemical Waste Management, Inc. “June 20, 1999.
- e. “Landfill Unit B19 – Record of Survey and Record of Waste Chemical Waste Management, Inc. – Kettleman Hills Facility CAT 000 646 117.” Letter, Kamal Azzam, Chemical Waste Management, Inc. to John McCarroll, U.S. EPA Region 9. July 2, 1999.
- f. “Construction Quality Assurance Report on Landfill B-19 Perimeter Berm 2004 Construction Kettleman Hills Facility, Kettleman City, California.” Golder Associates, Inc. May 2005.
- g. “Revisions to the As-Build Construction and Partial Closure Report for Landfill B-19 Perimeter Berm 2004 Construction, WDR No. 98-058 Discharge Specification B.8. and Provisions C.7. 27 CCR §§20323 and 20324; 22 CCR §6664.115 (in part).” Letter, Fred Papp, Chemical Waste Management, Inc. to Jim Koponen, Department of Toxic Substances Control and Jim Dowdall, Regional Water Quality Control Board. August 10, 2005.
- h. “Construction Quality Assurance Report on Landfill B-19 Perimeter Berm 2005 Construction Kettleman Hills Facility, Kettleman City, California.” Golder Associates, Inc. June 2006.
- i. “Construction Quality Assurance Report on Landfill B-19 Class I Final Closure, Stability Berm and Drainage 2006 Construction Kettleman Hills Facility, Kettleman City, California.” Golder Associates, Inc. December 2006.



- j. “Landfill Unit B-19 Closure Documents Recorded by Kings County.” Letter, Carol Carollo, Chemical Waste Management, Inc. to Ruth Cayabyab, Department of Toxic Substances Control and Jim Dowdall, Regional Water Quality Control Board. August 10, 2005.
  - k. “Modification 2 to Landfill B-19 Closure Plan for Class I Portion.” Letter, Chemical Waste Management, Inc. to Ruth Cayabyab, Department of Toxic Substances Control and Jim Dowdall, Regional Water Quality Control Board. April 14, 2006. With Enclosures: “03/17/06 Landfill B-19 Addendum Closure Plan Meeting Summary and Response to Comments.” Chemical Waste Management, Inc. April 14, 2006 and “Modification No. 2 to Landfill Unit B-19 Closure Plan for Class I Portion, Kettleman Hills Facility.” Golder Associates, Inc. April 2006.
  - l. “Temporary Authorization Request, Supplemental Information on Landfill B-19 Closure.” Letter, Robert Henry, Chemical Waste Management, Inc. to Pauline Batarseh, Department of Toxic Substances Control. June 2, 2006. With enclosure: “Response to DTSC Comments on Modification No. 2 Landfill Unit B-19 Closure Plan for Class I Portion, Kettleman Hills Facility.” Letter, Scott G. Sumner, Golder Associates to Chemical Waste Management, Inc. May 2, 2006.
4. Post-Closure Inspection Reports
- a. “Chemical Waste Management, Inc., – Kettleman Hills Facility 2008 Annual Post-Closure Inspection Report & 2008 Annual Facility Inspection Certification.” Letter, Paul Turek, Chemical Waste Management, Inc. to Ruth Cayabyab, Department of Toxic Substances Control and Jim Dowdall, Regional Water Quality Control Board. October 1, 2008.
  - b. “Chemical Waste Management, Inc. – Kettleman Hills Facility 2009 Annual Post-Closure Inspection Report & 2009 Annual Facility Inspection Certification.” Letter, Paul Turek, Chemical Waste Management, Inc. to Ruth Cayabyab, Department of Toxic Substances Control and Jim Dowdall, Regional Waste Quality Control Board. September 29, 2009.
  - c. “2010 Annual Post-Closure Inspection Kettleman Hills Facility Kettleman City, California.” Golder Associated, Inc. September 28, 2010.
  - d. “Chemical Waste Management, Inc. – Kettleman Hills Facility 2010 Annual Post-Closure Inspection Report & 2010 Annual Facility Inspection Certification.” Letter Paul Turek, Chemical Waste Management, Inc. to Wayne Lorentzen, Department of Toxic Substances Control and Jim Dowdall, Regional Waste Quality Control Board. September 30, 2010.
  - e. “2011 Annual Post-Closure Inspection Kettleman Hills Facility Kettleman City, California.” Golder Associated, Inc. September 2011.
  - f. “Chemical Waste Management, Inc. – Kettleman Hills Facility 2011 Annual Post-Closure Inspection & 2011 Annual Facility Inspection Certification.” Letter Paul Turek, Chemical Waste Management, Inc. to Wayne Lorentzen, Department



- of Toxic Substances Control and Jim Dowdall, Regional Waste Quality Control Board.t.” Golder Associated, Inc. for Chemical Waste Management, Inc. September 29, 2011.
- g. “Report on 2011 Annual Post-Closure Inspection, Kettleman Hills Facility Kettleman City California.” Golder Associates, Inc. September 2011.
  - h. “Report on 2012 Annual Post-Closure Inspection, Kettleman Hills Facility Kings County, California.” Golder Associates, Inc. September 2012.
  - i. “Chemical Waste Management, Inc. – Kettleman Hills Facility 2012 Annual Post-Closure Inspection Report & 2012 Annual Facility Inspection Certification.” Letter Paul Turek, Chemical Waste Management, Inc. to Wayne Lorentzen, Department of Toxic Substances Control and Jim Dowdall, Regional Waste Quality Control Board. September 26, 2012.
  - j. “Report on 2013 Annual Post-Closure Inspection Kettleman Hills Facility Kings County, California.” Golder Associates, Inc. September 2013.
  - k. “Report on 2014 Annual Post-Closure Inspection Kettleman Hills Facility Kings County, California.” Golder Associates, Inc. September 2014.
  - l. “Report on 2015 Annual Post-Closure Inspection Kettleman Hills Facility Kings County, California.” Golder Associates, Inc. September 2015.
  - m. “Report on 2016 Annual Post Closure Inspection Kettleman Hills Facility, Kings County, California.” Golder Associates, Inc. September 2016.
  - n. “Chemical Waste Management, Inc. – Kettleman Hills Facility 2016 Annual Post-Closure Inspection Report & 2016 Annual Facility Inspection Certification.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Muzhda Ferouz, Department of Toxic Substances Control and Daniel Carlson, Regional Water Quality Control Board. September 26, 2016.
  - o. “Chemical Waste Management, Inc. – Kettleman Hills Facility 2017 Annual Post-Closure Inspection Report & 2017 Annual Facility Inspection Certification.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Ryan Batty, Department of Toxic Substances Control and Daniel Carlson, Regional Water Quality Control Board. September 29, 2017.
  - p. “Chemical Waste Management, Inc. – Kettleman Hills Facility Proposed Workplan for Annual Surveys of Hazardous Waste Management Units in Post-Closure Care at the Kettleman Hills Facility.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Ryan Batty, Department of Toxic Substances Control and Daniel Carlson, Regional Water Quality Control Board. March 30, 2018.
  - q. “Chemical Waste Management, Inc. – Kettleman Hills Facility 2018 Annual Post-Closure Inspection Report & 2018 Annual Facility Inspection Certification.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Ryan Batty, Department of Toxic Substances Control and Daniel Carlson, Regional Water Quality Control Board, September 28, 2018. With enclosure: “Report on



2018 Annual Post Closure Inspection Kettleman Hills Facility, Kings County, California.” Golder Associates, Inc. September 2018.

#### **D. LANDFILL B-18 CONSTRUCTION DOCUMENTS**

1. “Kettleman Hills Facility CAT 0006461176 Request for Approval on Landfill B18 Detailed Design.” Letter, Chemical Waste Management, Inc. to Department of Health Services; U.S. EPA Region 9; and Regional Water Quality Control Board. July 31, 1990. With enclosure: “Construction Specifications and Quality Assurance Plan Landfill Unit B-18 Phases I and II and Final Closure, Kettleman Hills Facility Kings County, California. Environmental Solutions, Inc. July 31, 1990.
2. “Construction Specifications and Quality Assurance Plan Landfill Unit B-18 Phases I and II and Final Closure, Kettleman Hills Facility Kings County, California. Environmental Solutions, Inc. July 31, 1990.
3. “Engineering and Design Report Landfill Unit B-18 Kettleman Hills Facility Kings County, California.” Environmental Solutions, Inc. August 15, 1990.
4. “Subgrade Geologic Mapping and Chemical Analysis for Landfill B-18, Phase I Kettleman Hills Facility Kettleman, California.” Golder Associates, Inc. November 27, 1991.
5. “Clay Source Report Landfill B-18, Phases IA and IB Kettleman Hills Facility Kettleman City, California.” Environmental Construction Services, Inc. November 25, 1991.
6. “Secondary Clay Liner Report Landfill B-18, Phases IA and IB Kettleman Hills Facility Kettleman City California.” Environmental Construction Services, Inc. January 6, 1992.
7. “Potential Chemical Similarities between the B-19 and B-18 Clay, Kettleman Hill Facility.” Letter, Kerry Parkinson, Environmental Solutions, Inc. to Robert Henry, Chemical Waste Management, Inc. January 9, 1992.
8. “Primary Clay Liner Report Landfill B-18, Phases IA and IB Kettleman Hills Facility Kettleman City California.” Environmental Construction Services, Inc. January 13, 1992.
9. “Secondary HDPE liner and Leachate Collection System Report Landfill B-18, Phases IA and IIB, Volume B, Kettleman Hills Facility Kettleman City, California.” Environmental Construction Services, Inc. January 13, 1992.
10. “Secondary HDPE liner and Leachate Collection System Report Landfill B-18, Phases IA and IIB, Volume A, Kettleman Hills Facility Kettleman City, California.” Environmental Construction Services, Inc. January 13, 1992.
11. “Primary HDPE Liner and Leachate Collection System Report, Landfill B-18, Phases IA and IB Kettleman Hills Facility, Kettleman City, California.” Environmental Construction Services, Inc. January 20, 1992.
12. “Test Fill and Infiltration Test Results Landfill Unit B-18 Phases I and II and Final Closure.” Environmental Solutions Inc. January 23, 1992.



13. “Design Changes and Design Clarification Landfill B-18, Phases IA and IB, Kettleman Hills Facility, Kettleman City California.” Environmental Construction Services, Inc. February 18, 1992.
14. “Summary Construction Report Landfill B-18 Phases IA and IB.” Environmental Construction Services, Inc. February 18, 1992.
15. “Final Inspection – Landfill B-18 Phases IA and IB – Chemical Waste Management, Inc.’s Kettleman Hills Facility – Kings County.” Letter, Shelton Gray, California Regional Water Quality Control Board to Rich Zweig, Chemical Waste Management, Inc. February 28 1992.
16. “Approval of the Certification Reports and As-Built Drawings for the Landfill B-18, Phase I, DTSC Permit Condition IV.C.9., Chemical Waste Management, Inc., Kettleman Hills Facility, EPA ID No. CAT 000646117.” Letter, Val Siebal, Department of Toxic Substances Control to Mark Langowski, Chemical Waste Management, Inc. March 10, 1992.
17. “Kettleman Hills Facility CAT 000646117 TSCA Approval Request for Landfill Unit B-18.” Letter, Carol Corollo, Chemical Waste Management, Inc., to Greg Czajkowski, U.S. EPA Region 9. April 10, 1992.
18. “Chemical Waste Management, Inc., Kettleman Hills Facility TSCA Approval to Operate Landfill Unit B-18.” Letter, David Howekamp, U.S. EPA Region 9, to Leo Stahlecker, Chemical Waste Management, Inc. May 15, 1992.
19. “Response Action Plan Landfill B-18 Kettleman Hills Facility.” SEC Donohue, Inc. for Chemical Waste Management, Inc. June 1, 1992.
20. “Operational Features Report Landfill B-18, Phases IA and IB, Kettleman Hills Facility, Kettleman City California.” Environmental Construction Services, Inc. June 26, 1992.
21. “Kettleman Hills Facility CAT 000646117 TSCA Approval to Operate Landfill Unit B-18.” Letter, Richard Zweig, Chemical Waste Management, Inc. to David Howekamp, U.S. EPA Region 9. August 18, 1992.
22. “Landfill B-18, Phases IA and IB, Construction Reports, Volume 1 – Clay Liner Source Report.” Golder Construction Services and ACZ Engineering and Environmental Services. May 1, 1993.
23. “Landfill B-18, Phases IA and IB, Construction Reports, Volume 2 – Subgrade Geologic Mapping and Chemical Analysis Report.” Golder Construction Services and ACZ Engineering and Environmental Service. May 1, 1993.
24. “Revised Intermediate Waste Fill Plan – Landfill Unit B-18, Phase I, Kettleman Hills Facility, Kings County, California.” Environmental Solutions, Inc. August 1993.
25. “Landfill Unit B-18 Phases IIA/IIB Volume 3 Extension Basin Detail (Design).” Stamped by Michael Cranston for Chemical Waste Management Inc. August 27, 1993.





26. “Construction Reports for Landfill B-18, Phases IIA and IIB, Kettleman City California Excavation and Structural Fill Placement Construction Report – Volume 3.” Golder Construction Services and ACZ Engineering, Inc. August 27, 1993.
27. “Construction Reports for Landfill B-18, Phases IIA and IIB, Kettleman City California – Secondary Clay Liner Volume 4, Final Report.” Golder Construction Services, Inc. and ACZ Engineering Inc. September 13, 1993.
28. “Construction Reports for Landfill B-18, Phases IIA and IIB, Kettleman City California – Secondary and Vadose HDPE Liner and Leachate Collection System Construction Report Volume 5, Final Report.” Golder Construction Services, Inc. and ACZ Engineering Inc. October 20, 1993.
29. “Construction Reports for Landfill B-18, Phases IIA and IIB, Kettleman City California – Volume 5A – Secondary Vadose HDPE Liner and Leachate Collection System Report (Appendices A-D), Report.” Golder Construction Services, Inc. and ACZ Engineering Inc. October 20, 1993.
30. “Construction Reports for Landfill B-18, Phases IIA and IIB, Kettleman City California – Volume 5B – Secondary Vadose HDPE Liner and Leachate Collection System Report (Appendix E), Report.” Golder Construction Services, Inc. and ACZ Engineering Inc. October 20, 1993.
31. “Construction Reports for Landfill B-18, Phases IIA and IIB, Kettleman City California – Volume 5C – Secondary Vadose HDPE Liner and Leachate Collection System Report (Appendices F-O), Report.” Golder Construction Services, Inc. and ACZ Engineering Inc. October 20, 1993.
32. “Construction Reports for Landfill B-18, Phases IIA and IIB, Kettleman City California – Volume 6 – Primary Clay Liner Construction Report.” Golder Construction Services, Inc. and ACZ Engineering Inc. October 20, 1993.
33. “Construction Reports for Landfill B-18, Phases IIA and IIB, Primary HPDE Liner and Leachate Collection System Report (Appendices), Volume 7A.” Golder Construction Services, Inc. and ACZ Engineering Inc. November 8, 1993.
34. “Construction Reports for Landfill B-18, Phases IIA and IIB, Construction Reports for Primary HPDE Liner and Leachate Collection System– Volume 7 –Report.” Golder Construction Services, Inc. and ACZ Engineering Inc. November 8, 1993.
35. “Landfill B-18, Phases IIA and IIB Construction Reports Volume 8 – Summary Construction Report.” Golder Construction Services and ACZ Engineering and Environmental Services. November 8, 1993.
36. “Construction Reports for Landfill B-18, Phases IIA and IIB, Kettleman City, California, Operations Features Report, Volume 9, Final Report.” Golder Construction Services, Inc. and ACZ Engineering, Inc. December 6, 1993.
37. “Chemical Waste Management, Inc. (CWM) – Landfill Unit B-18 Phase II Final Inspection and Construction Certification Report.” Letter, William Pfister and Shelton Gray, California Regional Water Quality Control Board Central Valley Region to Rich Zweig, Chemical Waste Management, Inc. December 8, 1993.



38. “Approval of the Certification Reports and as Built Drawings for the Landfill b-18, Phase II, DTSC Permit Condition IV.C.9.C Chemical Waste Management, Incorporated, Kettleman hills Facility, EPA I.D. No. CAT 000646117.” Letter, James Pappas, Department of Toxic Substances Control Region 1 to Richard Zweig, Chemical Waste Management, Inc. December 23, 1993.
39. “TSCA Approval Request for Landfill B-18 Phase II, Chemical Waste Management Inc.’s Kettleman Hills Facility”, Letter, Catherine Pool, Chemical Waste Management, Inc., to Vince Mancus, U.S. EPA Region 9, December 27, 1993.
40. “Re; Chemical Waste Management, Inc., Kettleman Hills Facility TSCA Approval to Operate Landfill Unit B-18, Phase II”, Letter, David Howekamp, US Environmental Protection Agency Region 9 to Leo Stahlecker, Chemical Waste Management, Inc., December 30, 1993.
41. “Kettleman Hills Landfill B-18 Phase IIA & IIB Response Action Plan Update Based on As-built Conditions.” Letter, Robert Fifarek, RUST Environment & Infrastructure to Catherine Poole, Chemical Waste Management, Inc. January 29, 1994.
42. “Engineering and Design Report, Landfill Unit B-18, Kettleman Hills Facility, Kettleman City California.” Golder Associates, Inc. August 2011.
43. “Construction Quality Assurance (CQA) Report for Landfill B-18 Phase III Expansion, Volume 1: Phase IIIA Subgrade and Secondary Clay Liner, Kettleman Hills Facility, Kings County, California.” Golder Associates, Inc. January 2015.
44. “Construction Quality Assurance (CQA) Report for Landfill B-18 Phase III Expansion, Volume 2: Phase IIIA Geosynthetics and Operations Layer, Kettleman Hills Facility, Kings County, California.” Golder Associates, Inc. February 2015.
45. “Construction Quality Assurance (CQA) Report for Landfill B-18 Phase III Expansion, Volume 4: Phase IIIB Geosynthetics, Phase IIIB Operations Layer, and Phase III Operations Features, Kettleman Hills Facility, Kings County, California.” Golder Associates, Inc. December 2015 (Revised April 2016).
46. “Construction Quality Assurance (CQA) Report for Landfill B-18 Phase III Expansion, Volume 3: Phase IIIB Subgrade and Secondary Clay Liner, Kettleman Hills Facility, Kings County, California.” Golder Associates, Inc. November 2015.

#### **E. PCB FLUSHING AND STORAGE UNIT**

1. “PCB Building Containment Area.” Email, Bob Henry, Chemical Waste Management to Edwin Poalinelli, U.S. EPA Region 9. July 1, 2010.
2. Letter, Robert Henry, Chemical Waste Management, Inc. to Regional Administrator, U.S. EPA Region 9. August 25, 2010. With enclosure: “Kettleman Hills Facility PCCB Building Self-Implementing Cleanup Plan, 40 CFR §762.61(a).” Waste Management, Inc. August 2010.
3. “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.” Letter, Arlene Kabei, U.S.



- EPA Region 9, to Robert Henry, Chemical Waste Management, Inc. September 23, 2010.
4. “Chemical Waste Management, Inc. Kettleman Hills Facility PCB Cleanup Completion Report.” Letter, Robert Henry, Chemical Waste Management, Inc. to Carmen Santos, U.S. EPA Region 9. December 16, 2010. With enclosures.
  5. “PCB Outside Pad Replacement and Cleanup Completion Report, Kettleman Hills Facility, Kings County, CA.” Associated Design & Engineering, Inc. January 10, 2011.
  6. “March 24, 2011 Letter re CWMI’s PCB Outside Pad Replacement and Cleanup Completion Report – Kettleman Hills Facility (EPA Identification No. CAT 000646117).” Letter, Paul Turek, Chemical Waste Management, Inc. to Wayne Lorentzen, Department of Toxic Substance Control. May 6, 2011.
  7. “DTSC Review of Response to Comments on the IM Corrective Action Completion Report, Chemical Waste Management, Inc., Kettleman Hills Facility, 35251 Old Skyline Road, Kettleman City, Kings County, California 93239, Environmental Protection Agency Identification Number CAT000646117.” Letter, Wayne Lorentzen, Department of Toxic Substance Control to Paul Turek, Chemical Waste Management, Inc. June 21, 2011.
  8. “Chemical Waste Management, Inc. – Kettleman Hills Facility Revised IM Corrective Action Completion Report: PCB Outside Pad Replacement and Cleanup report, PCB Cleanup Completion Report.” Letter, Paul Turek, Chemical Waste Management, Inc. to Wayne Lorentzen, Department of Toxic Substance. July 21, 2011. With Enclosures
    - a. “PCB Outside Pad Replacement and Cleanup Completion Report, Kettleman Hills Facility Kings Count, CA.” Associated Design & Engineering, Inc. January 10, 2011 (revised July 20, 2011).
  9. “Acceptance of the Interim Measures Corrective Action Completion Report, Chemical Waste Management, Inc. Kettleman Hills Facility, 35251 Old Skyline Road, Kettleman City, Kings County, California 93239, Environmental Protection Agency Identification Number CAT000646117.” Letter, Wayne Lorentzen, Department of Toxic Substances Control to Paul Turek, Chemical Waste Management, Inc. August 17, 2011.
  10. “Notice of Decision – Approval of the Interim Measures Corrective Action Completion Report.” Public Notice, Wayne Lorentzen, Department of Toxic Substances Control to Whom it May Concern. February 13, 2012.
  11. “Final Statement of Basis -- Selected Remedy for the PCB Storage Building Cleanup Chemical Waste Management, Inc. Kettleman Hills Facility, 35251 Old Skyline Road, Kettleman City, Kings County, California 93239, Environmental Protection Agency Identification Number CAT000646117.” Department of Toxic Substances Control to Whom it May Concern. February 13, 2012.
  12. “Engineer’s Certification for the Outside Containment System for the PCB Flushing/Storage Unit at the Kettleman Hills Facility – Kings County, California (EPA ID NO.: CAT000646117).” Letter from Ryan Hillman, Golder Associates to Reyna Verdin, Chemical Waste Management, Inc. October 1, 2018.



13. “Engineer’s Certification for the Interior Containment System for the PCB Flushing/Storage Unit at the Kettleman Hills Facility – Kings County, California (EPA ID NO.: CAT000646117).” October 1, 2018.

## **F. OTHER KETTLEMAN HILLS FACILITY WIDE PLANS**

### **1. Ambient Air Monitoring Plans**

- a. “Air Monitoring – Technical Work Plan.” Kettleman Hills Facility.” NUS Corporation. February 1986.
- b. “Ambient Air Monitoring Plan, Final.” EarthTech, Inc. February 2006.
- c. “Approval of the Final Ambient Air Monitoring Plan, February 2006, Kettleman Hills Facility, Kings County, California, United States Environmental Protection Agency (USEP) ID Number CAT000646117.” Letter, Pauline Batarseh, Department of Toxic Substances Control to Paul Turek, Chemical Waste Management, Inc. March 29, 2006.
- d. “Chemical Waste Management, Inc., Kettleman Hills Facility requested Air Modeling Data” Letter, Paul Turek, Chemical Waste Management, Inc. to Lily Lee, U.S. EPA Region 9. July 27, 2006.
- e. “Site-Specific Ambient Air Monitoring Plan.” EarthTech, Inc. February 2007.
- f. “Site-Specific Ambient Air Monitoring Plan.” EarthTech, Inc. Second Revision, July 2007.
- g. “Risk analysis.” Letter from Paula Bisson, U.S. EPA Region 9, to Paul Turek, Chemical Waste Management, Inc. September 8, 2008.
- h. “Site-Specific Ambient Monitoring Plan.” Wenck Associates, Inc. Fourth Revision, November 2010.
- i. “Site-Specific Ambient Air Monitoring Plan.” EarthTech, Inc. Third Revision, May 2010.
- j. “Comments on Site Specific Air Monitoring Plan, Third Revision, Chemical Waste Management, Inc., Kettleman Hills Facility, 35251 Old Skyline Road, Kettleman City, Kings County, California 93239, Environmental Protection Agency Identification Number CAT000646117.” Letter, Wayne Lorentzen, Department of Toxic Substances Control to Paul Turek, Chemical Waste Management, Inc. August 10, 2010.
- k. “Site-Specific Ambient Air Monitoring Plan.” Wenck Associated, Inc. Fifth Revision, January 2016.
- l. “Revised Site-Specific Ambient Air Monitoring Plan (SSAAMP) for Location of Additional Downwind Monitoring Station and Month-Long PCB Sample, Chemical Waste Management, Inc., Kettleman Hills Facility, 35251 Old Skyline Road, Kettleman City, Kings County, California 93239, Environmental Protection Agency Identification Number CAT000646117.” Letter, Edward



Nieto, Department of Toxic Substances to Robert Henry, Chemical Waste Management, Inc. May 11, 2016.

2. Groundwater Monitoring Plans

- a. ““Certification and Signatory”” page for October 1985 Interim Status Monitoring Plan for Chemical Waste Management’s Kettleman Hills Facility.” EMCON. December 27, 1987. Includes “Hydrogeologic Characterization, Kettleman Hills Facility, Kings County, California.” EMCON Associates. December 1986.
- b. “Transmittal of Adopted Waste Discharge Requirements for Chemical Waste Management, Inc., Kettleman Hills Facility, Kings County.” Letter, William F. Pfister, California Regional Water Quality Control Board Central Valley Region to Robert g. Henry, Chemical Waste Management, Inc. March 11, 1998. With enclosure: “Order No. 98-058, Waste discharge Requirements for Chemical Waste Management, Inc. Kettleman Hills Facility, Kings County.” California Regional Water Quality Control Board Central Valley Region. February 27, 1998.
- c. “Site-Specific Groundwater Monitoring Plan, Kettleman Hills Facility, Chemical Waste Management, Inc., Kings County, California.” Geosyntec Consultants. May 2001.
- d. “Chemical Waste Management, Inc. – Kettleman Hills Facility Revised Site-Specific Ground Water Monitoring Plan Revised Site-Specific Unsaturated Zone Monitoring Plan.” Letter, Paul Turek, Chemical Waste Management, Inc. to Executive Officer, Regional Water Quality Control Board. April 15, 2014. With enclosure: “Revised Site-Specific Groundwater Monitoring Plan Class I Waste Management Units, Kettleman Hills Facility, Kings County, California.” AMEC Environment & Infrastructure, Inc. April 14, 2014.
- e. “Kettleman Hills Facility – TSCA Groundwater Monitoring Requirements.” Letter, Andrew M. Kenefick, Chemical Waste Management, Inc. to Frances Wicher, U.S. EPA Region 9. May 30, 2018. With enclosures.

3. Surface and Storm Water Plans

- a. “Surface Water Control Program for Kettleman Hills Facility,” Centra Consulting, Inc. October 23, 2009.
- b. “Stormwater Pollution Prevention Plan Chemical Waste Management, Inc., – Kettleman Hills Facility.” Golder Associates and SWT Engineering. March 2016.

4. SPCC Plan

- a. “Spill Prevention Control and Countermeasure Plan (SPCC) prepared for Chemical Waste Management, Inc. Kettleman Hills Facility.” Golder Associates, Inc. and Waste Management. October 2016.

**G. OTHER DOCUMENTS**

1. “Chemical Waste Management, Inc. – Kettleman Hills Facility Seismic Hazard Assessment for the Kettleman Hills Facility, Letter, Reyna Verdin, Chemical Waste



Management, Inc. to Ryan Batty, Department of Toxic Substances Control, December 28, 2017.

## VIII. COMPLIANCE AND MONITORING DOCUMENTS

### A. COMPLIANCE AND ENFORCEMENT DOCUMENTS

#### 1. TSCA Inspection Reports

- a. “Inspection Report. Facility: Kettleman Hills Facility, Chemical Waste Management, Inc.” U.S. EPA Region 9. Date of Inspection: December 8, 1993.
- b. “Inspection Report. Facility: Chemical Waste Management, Inc., Kettleman City, California.” Department of Toxic Substances Control. Date of Inspection: August 31, 1995; Date of Report: September 22, 1995.
- c. “Inspection Report. Facility: Chemical Waste Management, Inc., Kettleman Hills Facility.” Department of Toxic Substances Control. Date of Inspection: April 8, 1997; Date of Report: July 14, 1997.
- d. “Inspection Report. Purpose: TSCA Section 6(e) PCB Inspection. Inspection Date: October 14-15, 1998. Facility: Chemical Waste Management, Inc., Kettleman Hills Facility.” U.S. EPA Region 9. No date.
- e. “Chemical Waste Management, Inc. – Kettleman Hills Facility Response to TSCA Inspection Follow-Up Questions.” Letter, Paul Turek, Chemical Waste Management, Inc. to Max Weintraub, U.S. EPA Region 9. March 22, 1999.
- f. “Inspection Report. Purpose: TSCA Section 6(e) PCB Inspection. Inspection Date: October 25-26, 2001. Facility: Chemical Waste Management, Inc., Kettleman Hills Facility.” U.S. EPA Region 9. No date.
- g. “Inspection Report. Purpose: TSCA Section 6(e) PCB Inspection. Inspection Date: April 14-15, 2004. Facility: Chemical Waste Management, Inc., Kettleman Hills Facility.” U.S. EPA Region 9. No date.
- h. “Transmittal of Final Report – Multimedia Compliance Investigation: Phase 1; Chemical Waste Management, Inc. Kettleman Hills, CA NEIC Project No.: VP0686.” Memorandum, Diana Love, NEIC U.S. EPA to Christopher Rollins, U.S. EPA Region 9. January 17, 2006. With enclosure: “Multimedia Compliance Investigation: Phase 1; Chemical Waste Management, Inc. Kettleman Hills, CA NEIC Project No.: VP0686.” NEIC, U.S. EPA. January 2006.
- i. “TSCA Compliance Evaluation Inspection Report, February 8-12, 2010, Chemical Waste Management, Inc.” U.S. EPA Region 9. March 12, 2010.
- j. “TSCA Compliance Evaluation Inspection Report, June 2, 2010, Chemical Waste Management, Inc.” U.S. EPA Region 9. July 27, 2010.
- k. “TSCA Compliance Evaluation Inspection Report, November 29, 2012, Chemical Waste Management, Inc.” U.S. EPA Region 9. January 10, 2013.





1. “Inspection Report, Waste Management, Inc. – Kettleman Hills Facility, date of inspection: September 28, 2017.” U.S. EPA Region 9. October 27, 2017.
2. RCRA Inspection Reports
  - a. Letter, Astrid L. Brown, Department of Toxic Substances Control to Paul Turek, Chemical Waste Management, Inc. February 8, 2005. With enclosure: “Inspection Report: November 9, 10 and 30, 2004.” Department of Toxic Substances Control. February 8, 2005.
  - b. “Multimedia Compliance Investigation: Phase 2; Chemical Waste Management, Inc. Kettleman Hills, CA NEIC Project No.: VP0686.” NEIC, U.S. EPA. April 2007. [REDACTED].
  - c. “Financial Responsibility Review Findings – Chemical Waste Management, 35251 Old Skyline Road, Kettleman City, California 93239, Environmental Protection Agency Identification Number CAT000646117.” Letter, Keith Kihara, Department of Toxic Substances Control to Paul Turek, Chemical Waste Management, Inc. March 16, 2009. With enclosure: “Financial Responsibility Review Findings.” Department of Toxic Substances Control. March 13, 2009.
  - d. “Financial Responsibility Review Findings – Chemical Waste Management, 35251 Old Skyline Road, Kettleman City, California 93239, Environmental Protection Agency Identification Number CAT000646117.” Letter, Keith Kihara, Department of Toxic Substances Control to Paul Turek, Chemical Waste Management, Inc. October 8, 2009. With enclosure: “Financial Responsibility Review Findings.” Department of Toxic Substances Control. October 6, 2009.
  - e. “Inspection Report: September 15-16, 2009.” Department of Toxic Substances Control. October 21, 2009.
  - f. Letter, Amy Miller, U.S. EPA Region 9, to Paul Turek, Chemical Waste Management, Inc. February 25, 2011. With enclosure: “Inspection Report, Waste Management, Kettleman Hills Facility (Inspection date: November 12, 2010).” U.S. EPA Region 9. February 25, 2011.
  - g. “Financial Responsibility Review Findings – Chemical Waste Management, 35251 Old Skyline Road, Kettleman City, California 93239, Environmental Protection Agency Identification Number CAT000646117.” Letter, Jerry Barnes, Department of Toxic Substances Control to Paul Turek, Chemical Waste Management, Inc. June 12, 2012. With enclosure: “Financial Responsibility Review Findings.” Department of Toxic Substances Control. June 12, 2012.
  - h. “Groundwater Operation and Maintenance (O&M) Inspection Report, Chemical Waste Management – Kettleman Hills Facility, Kings County, California.” Department of Toxic Substances Control. September 9, 2012.
  - i. “Financial Responsibility Review Findings – Chemical Waste Management, 35251 Old Skyline Road, Kettleman City, California 93239, Environmental Protection Agency Identification Number CAT000646117.” Letter, Jerry Barnes, Department of Toxic Substances Control to Paul Turek, Chemical Waste



- Management, Inc. May 20, 2013. With enclosure: “Financial Responsibility Review Findings.” Department of Toxic Substances Control. May 17, 2013.
- j. Letter, Ignacio R. Dominguez, Department of Toxic Substances Control, to Paul Turek, Chemical Waste Management, Inc. June 25, 2013. With enclosure: “Inspection Report: April 23-24, 2013.” Department of Toxic Substances Control. June 24, 2013.
- k. “Transmittal of Groundwater Audit Report for February 19, 2014 Chemical Waste Management, Kettleman Facility, Kings County, California, CAT000646117.” Letter, Jeff Brown, Department of Toxic Substances Control to Paul Turek, Chemical Waste Management, Inc. April 8, 2014. With enclosure: “Groundwater Audit Report, Chemical Waste Management – Kettleman Hills Facility, Kings County, California.” Department of Toxic Substances Control. April 7, 2014.
- l. Letter, Dan Lynch, Department of Toxic Substances Control, to Jim Sook, Chemical Waste Management, Inc. July 24, 2014. With enclosure: “Inspection Report: March 18, 2014.” Department of Toxic Substances Control. July 24, 2014.
- m. “Financial Responsibility Review Findings.” Department of Toxic Substances Control. August 12, 2014.
- n. Letter, Dan Lynch, Department of Toxic Substances Control, to Bob Henry, Chemical Waste Management, Inc. December 3, 2014. With enclosure: “Inspection Report: September 24, 2014.” Department of Toxic Substances Control. November 19, 2015.
- o. Letter, Dan Lynch, Department of Toxic Substances Control, to Bob Henry, Chemical Waste Management, Inc. December 18, 2014. With enclosure: “Inspection Report: December 10, 2014.” Department of Toxic Substances Control. December 3, 2014.
- p. “Financial Responsibility Review Findings.” Department of Toxic Substances Control. April 28, 2015.
- q. Letter, Robert Easley, Department of Toxic Substances Control, to Bob Henry, Chemical Waste Management, Inc. June 30, 2015. With enclosure: “Inspection Report: March 17 and 18, 2015.” Department of Toxic Substances Control. June 30, 2015.
- r. Letter, Dan Lynch, Department of Toxic Substances Control, to Paul Turek, Chemical Waste Management, Inc. December 4, 2015. With enclosure: “Inspection Report: September 30, 2015.” Department of Toxic Substances Control. December 4, 2015.
- s. Letter, Dan Lynch, Department of Toxic Substances Control, to Paul Turek, Chemical Waste Management, Inc. February 16, 2016. With enclosure: “Inspection Report: December 29, 2015.” Department of Toxic Substances Control. February 16, 2016.



- t. “Financial Responsibility Review Findings.” Department of Toxic Substances Control. February 29, 2016.
- u. Letter, Robert Easley, Department of Toxic Substances Control, to Paul Turek, Chemical Waste Management, Inc. April 1, 2016. With enclosure: “Inspection Report: February 9 and 10, 2016.” Department of Toxic Substances Control. April 1, 2016.
- v. Letter, Robert Easley, Department of Toxic Substances Control, to Reyna Verdin, Chemical Waste Management, Inc. September 28, 2016. With enclosure: “Inspection Report: September 14, 2016.” Department of Toxic Substances Control. September 28, 2016.
- w. “Financial Responsibility Review Findings.” Department of Toxic Substances Control. March 10, 2017.
- x. Letter, Dan Lynch, Department of Toxic Substances Control, to Reyna Verdin, Chemical Waste Management, Inc. April 4, 2017. With enclosure: “Inspection Report: February 1-2, 2017.” Department of Toxic Substances Control. April 4, 2017.
- y. “Transmittal of Groundwater Audit Report for May 2, 2017 Chemical Waste Management, Kettleman Facility, Kings County, California, CAT000646117.” Letter, Matthew Farris, Department of Toxic Substances Control to Reyna Verdin, Chemical Waste Management, Inc. May 31, 2017. With enclosure: “Focused Groundwater Audit Report, Chemical Waste Management – Kettleman Hills Facility, Kings County, California.” Department of Toxic Substances Control. June 6, 2017.
- z. Letter, Robert Easley, Department of Toxic Substances Control, to Reyna Verdin, Chemical Waste Management, Inc. June 21, 2017. With various enclosures.
- aa. Letter, April Ranney, Department of Toxic Substances Control, to Reyna Verdin, Chemical Waste Management, Inc. September 28, 2017. With enclosure: “Summary of Observations.” Department of Toxic Substances Control. August 17, 2017.
- bb. “Financial Responsibility Review Findings.” Department of Toxic Substances Control. April 9, 2018.
- cc. Letter, Robert Easley, Department of Toxic Substances Control, to Reyna Verdin, Chemical Waste Management, Inc. October 2, 2018. With enclosure: “Inspection Report: September 11, 2018.” Department of Toxic Substances Control. October 2, 2018.
- dd. “Inspection Report, Kettleman Hills Facility: April 17, 2019.” Department of Toxic Substances Control. May 14, 2019.



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### 3. Compliance Documents

- a. “Chemical Waste Management, Inc – Kettleman Hills Facility Monitoring of Landfill B-16 Lysimeters.” Letter, Paul E. Turek, Chemical Waste Management, Inc. to Max Weintraub, U.S. EPA Region 9. February 13, 2004.
- b. “Chemical Waste Management’s Voluntary Disclosure of a Possible TSCA Violation.” Letter, Paula Bisson, U.S. EPA Region 9 to Paul Turek, Chemical Waste Management, Inc. May 6, 2004.
- c. “Chemical Waste Management, Inc – Kettleman Hills Facility Voluntary Disclosure Questionnaire Landfill B-16 Lysimeters.” Letter, Paul Turek, Chemical Waste Management, Inc. to Paula Bisson, U.S. EPA Region 9. May 24, 2004.
- d. “TSCA Information Request Letter.” Letter, Paula Bisson, U.S. EPA Region 9 to Paul Turek, Chemical Waste Management, Inc. June 3, 2004.
- e. “Chemical Waste Management, Inc – Kettleman Hills Facility Voluntary Disclosure Landfill B-16 Lysimeters.” Letter, Andrew M. Kenefick, Chemical Waste Management, Inc. to David Kim, U.S. EPA Region 9. August 20, 2004. [Confidential Settlement Communication].
- f. Letter, Enrique Manzanilla, U.S. EPA Region 9 to Andrew M. Kenefick, Chemical Waste Management, Inc. May 3, 2005. With enclosure: “Docket No. TSCA-09-2005-0002 Consent Agreement and Final Order Pursuant to 40 C.F.R. §§ 22.13 and 22.18.” U.S. EPA Region 9. May 3, 2005.
- g. “Notice of Noncompliance for Violations of Toxic Substances Control Act.” Letter, Paula Bisson, U.S. EPA to Paul Turek, Chemical Waste Management, Inc. June 26, 2007.
- h. “Aviso de incumplimiento para violaciones de la ley de control de sustancias tóxicas.” Letter, Paula Bisson, U.S. EPA Region 9 to Paul Turek, Chemical Waste Management, Inc. 26 de junio de 2007.
- i. “Chemical Waste Management, Inc. – Kettleman Hills Facility Response to 06/26/07 TSCA Notice of Noncompliance PCB Analytical Methodology.” Letter, Paul Turek, Chemical Waste Management, Inc. to Christopher Rollins, U.S. EPA Region 9. August 1, 2007. With enclosure.
- j. “Notice of Noncompliance Follow Up Letter.” Letter, Paula Bisson, U.S. EPA Region 9, to Paul Turek, Chemical Waste Management, Inc. November 28, 2007.
- k. “Chemical Waste Management, Inc. – Kettleman Hills Facility Response to TSCA Notice of Noncompliance Follow-Up Letter PCB Performance Evaluation Samples.” Letter, Paul Turek, Chemical Waste Management, Inc. to Christopher Rollins, U.S. EPA Region 9. December 20, 2007.
- l. “Chemical Waste Management, Inc. - Kettleman Hills Facility Response to TSCA Notice of Noncompliance Follow-Up Letter PCB Performance Evaluation



- Samples - Second Set.” Letter, Paul Turek, Chemical Waste Management, Inc. to Christopher Rollins, U.S. EPA Region 9. February 12, 2008.
- m. “Notice of Violation.” Letter, Amy Miller, U.S. EPA Region 9 to Paul Turek, Chemical Waste Management, Inc. January 26, 2010.
  - n. “Aviso de Violación.” Letter, Amy Miller, U.S. EPA Region 9 to Paul Turek, Chemical Waste Management, Inc. 26 de enero de, 2010.
  - o. “Chemical Waste Management, Inc. – Kettleman Hills Facility Re: Notice of Violation – EPA I.D. Number CAT000646117.” Letter, Paul Turek, Chemical Waste Management, Inc. to Kandace Bellamy, U.S. EPA Region 9. January 29, 2010.
  - p. “Notice of Violation.” Letter, Amy Miller, U.S. EPA Region 9 to Paul Turek, Chemical Waste Management, Inc. February 4, 2010.
  - q. “Chemical Waste Management, Inc. – Kettleman Hills Facility Re: Notice of Violation – EPA I.D. Number CAT000646117.” Letter, Paul Turek, Chemical Waste Management, Inc. to Kandace Bellamy, U.S. EPA Region 9. February 26, 2010.
  - r. “Kettleman Hills Facility, Kettleman City, CA EPA Identification Number CAT 000 646 117.” Letter, Amy Miller, U.S. EPA Region 9 to Andrew Kenefick, Chemical Waste Management, Inc. April 8, 2010. With enclosure: “Multimedia Compliance Investigation: Phase 2; Chemical Waste Management, Inc. Kettleman Hills, CA NEIC Project No.: VP0686.” NEIC, U.S. EPA. April 2007 [REDACTED].
  - s. “Aviso de violaciones de la Ley de Control de Sustancias Tóxicas.” Letter, Amy Miller, U.S. EPA Region 9 to Andrew Kenefick, Chemical Waste Management, Inc. 8 de abril; del 2010.
  - t. “60-Day Notice of Unacceptability Under the CERCLA Off-Site Rule and Opportunity for Informal Conference.” Letter, Amy Miller, U.S. EPA Region 9 to Paul Turek, Chemical Waste Management, Inc. April 8, 2010.
  - u. “Chemical Waste Management, Inc. – Kettleman Hills Facility Re: Notice of Violation – EPA I.D. Number CAT000646117.” Letter, Paul Turek, Chemical Waste Management, Inc. to Christopher Rollins, U.S. EPA Region 9. May 10, 2010.
  - v. “Chemical Waste Management, Inc., Kettleman Hills Facility Laboratory.” Letter, Jeff Scott, U.S. EPA Region 9 to Andrew Kenefick, Chemical Waste Management, Inc. May 27, 2010.
  - w. “Laboratorio de la Instalación de Kettleman Hills de Chemical Waste Management, Inc.” Letter, Jeff Scott, U.S. EPA Region 9 to Andrew Kenefick, Chemical Waste Management, Inc. 27 de mayo de 2010.



- x. “Chemical Waste Management, Inc., Kettleman Hills Facility Laboratory.” Letter, Andrew Kenefick, Chemical Waste Management, Inc. to Letitia Moore, U.S. EPA Region 9. June 7, 2010. With enclosures.
- y. “Request for Meeting Regarding Kettleman Hills Facility.” Letter, Duane Woods, Chemical Waste Management, Inc. to Jared Blumenfeld, U.S. EPA Region 9. June 9, 2010. With enclosure: “Chemical Waste Management, Inc., Kettleman Hills Facility Laboratory.” Letter, Andrew Kenefick, Chemical Waste Management, Inc. to Letitia Moore, U.S. EPA Region 9. June 7, 2010.
- z. “Resolution of April 8, 2010 Off-Site Rule Notice letter.” Letter, Jeff Scott, U.S. EPA Region 9 to Paul Turek, Chemical Waste Management, Inc. July 8, 2010.
- aa. “Resolución de la notificación del 8 de abril de 2010 bajo el reglamento sobre la disposición fuera del sitio (“Off-Site Rule”).” Letter, Jeff Scott, U.S. EPA Region 9 to Paul Turek, Chemical Waste Management, Inc. 8 de julio de 2010
- bb. “60-Day Notice of Unacceptability Under the CERCLA Off-Site Rule and Opportunity for Informal Conference.” Letter, Amy Miller, U.S. EPA Region 9 to Paul Turek, Chemical Waste Management, Inc. July 15, 2010. With enclosure: 58 FR 49200 (September 22, 1993) “Amendment to the National Oil and Hazardous Substances Pollution Contingency Plan; Procedures for Planning and Implementing Off-Site Response Actions.”
- cc. “Notice of Toxic Substances Control Act Violation. Kettleman Hills Facility, Kettleman City, CA EPA Identification Number CAT 000 646 117.” Letter, Amy Miller, U.S. EPA Region 9 to Paul Turek, Chemical Waste Management, Inc. July 15, 2010.
- dd. “Aviso de violaciones de la Ley de control de Sustancias Tóxicas. Instalación Kettleman Hills, Kettleman City, Número de Identificación de la EPA CAT 000 646 117.” Letter, Amy Miller, U.S. EPA Region 9 to Paul Turek, Chemical Waste Management, Inc. 15 de julio de 2010.
- ee. “TSCA Compliance Evaluation Inspection Report and Notice of Violation.” Letter, Amy Miller, U.S. EPA Region 9 to Paul Turek, Chemical Waste Management, Inc. September 8, 2010.
- ff. “Informe de Inspeccion de Evaluacion de Cumplimiento bajo TSCA y Aviso de violaciones .” Letter, Amy Miller, U.S. EPA Region 9 to Paul Turek, Chemical Waste Management, Inc. 8 de septiembre de 2010.
- gg. “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.” Letter, Arlene Kabei, U.S. EPA Region 9, to Robert Henry, Chemical Waste Management, Inc. September 23, 2010.
- hh. “Bifeniles Policlorados (PCBs) – Aprobación Condicional de USEPA bajo 40 CFR 761.61(a), Ley de Control de Sustancias Tóxicas, Limpieza Independiente de PCBs en el Edificio de PCB, Instalación Waste Management Kettleman





- Hills.” Letter, Arlene Kabei, U.S. EPA Region 9, to Robert Henry, Chemical Waste Management, Inc. 23 de septiembre de 2010.
- ii. “Corrective Action Consent Order, Chemical Waste Management, Inc. Kettleman Hills Facility, 35251 Old Skyline Road, Kettleman City, Kings County, California 93239, Environmental Protection Agency Identification Number CAT 000646117.” Letter, Wayne Lorentzen, Department of Toxic Substances Control to Robert Henry, Chemical Waste Management, Inc. October 18, 2010. With enclosure “Docket HWCA P1-10/11-001 Corrective Action Consent Order, Health and Safety Code Section 25187.” Department of Toxic Substances Control. October 14, 2010.
- jj. “Summary of Violations – Chemical Waste Management – Kettleman Hills.” Department of Toxic Substances Control. October 19, 2010.
- kk. “Consent Agreement and Final Order in the Matter of Chemical Waste Management, Inc.” Letter, Jeff Scott, U.S. EPA Region 9 to Bob Henry, Chemical Waste Management, Inc. November 29, 2010. With enclosure: “Docket No. TSCA-09-2011-0001 Consent Agreement and Final Order Pursuant to 40 C.F.R. §§ 22.13 and 22.18.” U.S. EPA Region 9. November 29, 2010.
- ll. “Orden No. TSCA-09-0211-0001 Acuerdo de Consentimiento y Orden Final Conforme A 40 C.F.R. §§ 22.13 and 22.18.” U.S. EPA Region 9. 29 de noviembre de 2010.
- mm. “Notice of Violation.” Letter, Amy Miller, U.S. EPA Region 9 to Paul Turek, Chemical Waste Management, Inc. February 25, 2011.
- nn. “In the matter of Chemical Waste Management, Inc. Enforcement Order.” Department of Toxic Substances Control. May 20, 2011.
- oo. “Docket No. RCRA-09-2011-0016 Consent Agreement and Final Order Pursuant to 40 C.F.R. §§ 22.13 and 22.18.” U.S. EPA Region 9. August 23, 2011.
- pp. “Orden No. TSCA-09-21-011-0016 Acuerdo de Consentimiento y Orden Final Conforme A 40 C.F.R. §§ 22.13 and 22.18.” U.S. EPA Region 9. 23 de agosto de 2011.
- qq. “DTSC proposes approval of the Kettleman Hills Facility’s cleanup of PCB storage building spills.” Factsheet. Department of Toxic Substances Control. September 2011.
- rr. “Fact Sheet on United States Environmental Protection Agency’s Compliance Investigation and Enforcement at Chemical Waste Management, Kettleman Hills.” Factsheet (English and Spanish). November 2011.
- ss. “Docket No. TSCA-09-2012-0009 Consent Agreement and Final Order Pursuant to 40 C.F.R. §§ 22.13 and 22.18.” U.S. EPA Region 9. September 7, 2012.
- tt. Letter, Ignacio R. Dominguez, Department of Toxic Substances Control to Bob Henry, Chemical Waste Management, Inc. October 22, 2012. With enclosure:



- “Summary of Violations.” Department of Toxic Substances Control. October 22, 2012.
- uu. “CWM Kettleman Hills Facility RCRA/TSCA Inspections 1983 – Present.” Department of Toxic Substances Control. March 2013.
- vv. “California v. Chemical Waste Management, Inc. Complaint for Civil Penalties and Injunctive Relief, Case No. BC503092.” Department of Toxic Substances Control. March 18, 2013.
- ww. “California v. Chemical Waste Management, Inc. Final Judgment on Consent and Permanent Injunction, Case No. BC503093.” Department of Toxic Substances Control. March 23, 2013.
- xx. Letter, Dan Lynch, Department of Toxic Substances Control to Reyna Verdin, Chemical Waste Management, Inc. October 13, 2016. With enclosures.
- yy. Letter, LeeAnn Young, Department of Toxic Substances Control to Reyna Verdin, Chemical Waste Management, Inc. August 10, 2017.
- zz. “Summary of Violations – Chemical Waste Management – Kettleman Hills.” Department of Toxic Substances Control. March 28, 2018.
- aaa. Letter, April Ranney, Department of Toxic Substances Control to Reyna Verdin, Chemical Waste Management, Inc. July 24, 2018. With enclosures.
- bbb. Letter, Maria G. Durand, Department of Toxic Substances Control to Reyna Verdin, Chemical Waste Management, Inc. May 28, 2019. With enclosure.
4. Other Compliance-Related Documents
- a. “Chemical Waste Management, Inc. – Kettleman Hills Facility Re: “Other” Noncompliance Report.” Letter, Paul Turek, Chemical Waste Management, Inc. to Wayne Lorentzen, Department of Toxic Substances Control. December 28, 2011.
- b. “Chemical Waste Management, Inc. – Kettleman Hills Facility Re: “Other” Noncompliance Report.” Letter, Paul Turek, Chemical Waste Management, Inc. to Wayne Lorentzen, Department of Toxic Substances Control. May 23, 2012.
- c. “Chemical Waste Management, Inc. – Kettleman Hills Facility re: Supplemental Information re Voluntary Disclosure of Non-compliance (Feb. 14, 2014)” Letter, Paul Turek, Chemical Waste Management, Inc. to Wayne Lorentzen, Department of Toxic Substances Control. March 28, 2014.
- d. “Chemical Waste Management, Inc. – Kettleman Hills Facility Re: “Other” Noncompliance Report.” Letter, Paul Turek, Chemical Waste Management, Inc. to Muzhda Ferouz, Department of Toxic Substances Control. August 3, 2015.
- e. “Chemical Waste Management, Inc. – Kettleman Hills Facility Re: “Other” Noncompliance Report.” Letter, Paul Turek, Chemical Waste Management, Inc. to Muzhda Ferouz, Department of Toxic Substances Control. October 2, 2015.



- f. “Chemical Waste Management, Inc. – Kettleman Hills Facility re: “Other” Noncompliance Report.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Ryan Batty, Department of Toxic Substances Control. August 10, 2017.
- g. “Chemical Waste Management, Inc. – Kettleman Hills Facility re: Supplemental Information re Voluntary Disclosure of Noncompliance (August 10, 2017)” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Ryan Batty, Department of Toxic Substances Control. November 6, 2017.
- h. “Comprehensive Compliance Monitoring and Enforcement Report – LAD000777201 Chemical Waste Management, Inc. Sulpher, Louisiana.” U.S. EPA. September 18, 2018. [Enforcement sensitive data].
- i. “Comprehensive Compliance Monitoring and Enforcement Report – ORD089452353 Chemical Waste Management, Inc. Arlington, Oregon.” U.S. EPA. September 18, 2018. [Enforcement sensitive data].
- j. “Comprehensive Compliance Monitoring and Enforcement Report – NYD04836679 Chemical Waste Management, Inc. Model City, New York.” U.S. EPA. September 19, 2018. [Enforcement sensitive data].
- k. “Chemical Waste Management, Inc. – Kettleman Hills Facility, Written Release Report.” Reyna Verdin, Chemical Waste Management, Inc. to Camille Rogado, Department of Toxic Substances Control. August 16, 2019.

## **B. GROUNDWATER MONITORING**

### **1. Annual Groundwater Reports**

- a. “Annual Graph Report for Data Through 2008, Kettleman Hills Facility, Kings County, CA.” AMEC Geomatrix, Inc. March 23, 2009.
- b. “Chemical Waste Management, Inc. – Kettleman Hills Facility Annual Graph Report.” Letter, Paul Turek, Chemical Waste Management, Inc. to Jim Dowdall, Regional Water Quality Control Board and Wayne Lorentzen, Department of Toxic Substances. March 1, 2011. With enclosure: “Annual Graph Report for Data Through 2010, Kettleman Hills Facility, Kings County, CA.” AMEC Environment & Infrastructure, Inc. March 1, 2011.
- c. “Annual Graph Report for Data through 2011, Kettleman Hills Facility, Kings County, CA.” AMEC Environment & Infrastructure, Inc. February 16, 2012.
- d. “Annual Graph Report for Data Through 2012, Kettleman Hills Facility, Kings County, CA.” AMEC Environment & Infrastructure, Inc. February 25, 2013.
- e. “Annual Graph Report for Data Through 2013, Kettleman Hills Facility, Kings County, CA.” AMEC Environment & Infrastructure, Inc. February 25, 2014.
- f. “Chemical Waste Management, Inc. – Kettleman Hills Facility Annual Graph Report (Data Through 2014).” Letter, Paul Turek, Chemical Waste Management, Inc. to Dan Carlson, Regional Water Quality Control Board and Muzhda Ferouz, Department of Toxic Substance Control. February 26, 2015. With enclosure:



- “Annual Graph Report for Data Through 2014, Kettleman Hills Facility, Kings County, CA.” AMEC Foster Wheeler. February 23, 2014.
- g. “Chemical Waste Management, Inc. – Kettleman Hills Facility Annual Graph Report (Data Through 2015). Letter, Paul Turek, Chemical Waste Management, Inc. to Dan Carlson, Regional Water Quality Control Board and Muzhda Ferouz, Department of Toxic Substance Control. February 26, 2016. With enclosure: “Annual Graph Report for Data Through 2015, Kettleman Hills Facility, Kings County, CA.” AMEC Foster Wheeler. February 23, 2015.
  - h. “Chemical Waste Management, Inc. – Kettleman Hills Facility Annual Evaluation of Soil-Gas Data Through 2016.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Regional Water Quality Control Board and Department of Toxic Substance Control. February 28, 2017. With enclosure: “Annual Graph Report for Data Through 2016, Kettleman Hills Facility, Kings County, CA.” AMEC Foster Wheeler. February 24, 2016.
  - i. “Chemical Waste Management, Inc. – Kettleman Hills Facility Annual Graph Report (Data Through 2017), Reyna Verdin, Chemical Waste Management, Inc. to Dan Carlson, Regional Water Quality Control Board and Ryan Batty, Department of Toxic Substance Control. February 28, 2018. With enclosure: “Annual Graph Report for Data Through 2017, Kettleman Hills Facility, Kings County, CA.” AMEC Foster Wheeler. February 23, 2018.
  - j. “Chemical Waste Management, Inc. – Kettleman Hills Facility Annual Graph Report” (Data Through 2018)”. Letter, Reyna Verdin, Chemical Waste Management, Inc. to Dan Carlson, Regional Water Quality Control Board and Ryan Batty, Department of Toxic Substance Control. February 28, 2019. With enclosure: “Annual Graph Report for Data Through 2014, Kettleman Hills Facility, Kings County, CA.” Wood Environment & Infrastructure Solutions, Inc. February 27, 2019.
2. Groundwater Monitoring Reports
- a. “First Quarter 2007 Groundwater and Unsaturated Zone Monitoring Report for Title 22 and 23 Regulated Waste Management Units. Kettleman Hills Facility, Kettleman City, California.” Letter, Bradley A. Loewen, Geomatrix, to Paul Turek, Chemical Waste Management, Inc. June 19, 2007. With enclosure: “First Quarter 2007 Groundwater and Unsaturated Zone Monitoring Report for Title 22 and 23 Regulated Waste Management Units. Kettleman Hills Facility, Kettleman City, California.” Geomatrix. June 19, 2007.
  - b. “Second Quarter 2007 Groundwater and Unsaturated Zone Monitoring Report for Title 22 and 23 Regulated Waste Management Units. Kettleman Hills Facility, Kettleman City, California.” Letter, Bradley A. Loewen, Geomatrix, to Paul Turek, Chemical Waste Management, Inc. September 26, 2007. With enclosure: “Second Quarter 2007 Groundwater and Unsaturated Zone Monitoring Report for Title 22 and 23 Regulated Waste Management Units. Kettleman Hills Facility, Kettleman City, California.” Geomatrix. September 2007.



- c. “Third Quarter 2007 Groundwater and Unsaturated Zone Monitoring Report for Class I Waste Management Units. Kettleman Hills Facility, Kettleman City, California.” Letter, Bradley A. Loewen, Geomatrix, to Paul Turek, Chemical Waste Management, Inc. December 19, 2007. With enclosure: “Third Quarter 2007 Groundwater and Unsaturated Zone Monitoring Report for Class I Waste Management Units. Kettleman Hills Facility, Kettleman City, California.” Geomatrix, December 2007.
- d. “Fourth Quarter 2007 Groundwater Constituents of Concern and Unsaturated Zone Monitoring Report for Class I Waste Management Units. Kettleman Hills Facility, Kettleman City, California.” Letter, Bradley A. Loewen, Geomatrix, to Paul Turek, Chemical Waste Management, Inc. April 9, 2008. With enclosure: “Fourth Quarter 2007 Groundwater Constituents of Concern and Unsaturated Zone Monitoring Report for Class I Waste Management Units. Kettleman Hills Facility, Kettleman City, California.” Geomatrix. April 2008.
- e. “First Quarter 2008 Groundwater and Unsaturated Zone Monitoring Report for Class I Waste Management Units. Kettleman Hills Facility, Kettleman City, California.” Letter, Bradley A. Loewen, Geomatrix, to Paul Turek, Chemical Waste Management, Inc. June 17, 2008. With enclosure: “First Quarter 2008 Groundwater and Unsaturated Zone Monitoring Report for Class I Waste Management Units, Kettleman Hills Facility, Kettleman City, California” Geomatrix, June 2008.
- f. “Second Quarter 2008 Groundwater and Unsaturated Zone Monitoring Report for Class I Waste Management Units. Kettleman Hills Facility, Kettleman City, California.” Letter, Bradley A. Loewen, Geomatrix, to Paul Turek, Chemical Waste Management, Inc. September 22, 2008. With enclosure: “Second Quarter 2008 Groundwater and Unsaturated Zone Monitoring Report for Class I Waste Management Units. Kettleman Hills Facility, Kettleman City, California.” Geomatrix. September 23, 2008.
- g. “Third Quarter 2008 Groundwater and Unsaturated Zone Monitoring Report for Class I Waste Management Units. Kettleman Hills Facility, Kettleman City, California.” Letter, Bradley A. Loewen, Geomatrix, to Paul Turek, Chemical Waste Management, Inc. December 22, 2008. With enclosure: “Third Quarter 2008 Groundwater and Unsaturated Zone Monitoring Report for Class I Waste Management Units. Kettleman Hills Facility, Kettleman City, California.” Geomatrix. December 22, 2008.
- h. “Fourth Quarter 2008 Groundwater and Unsaturated Zone Monitoring Report for Class I Waste Management Units. Kettleman Hills Facility, Kettleman City, California.” Letter, Bradley A. Loewen, Geomatrix, to Paul Turek, Chemical Waste Management, Inc. March 17, 2009. With enclosure: “Fourth Quarter 2008 Groundwater and Unsaturated Zone Monitoring Report for Class I Waste Management Units. Kettleman Hills Facility, Kettleman City, California.” Geomatrix. March 17, 2009.



- i. “First Quarter 2009 Groundwater and Unsaturated Zone Monitoring Report for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” Letter, Bradley A. Loewen, Amec, to Paul Turek, Chemical Waste Management, Inc. June 18, 2009. With enclosure: “First Quarter 2009 Groundwater and Unsaturated Zone Monitoring Report for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” AMEC Geomatrix. June 18, 2009.
- j. “Second Quarter 2009 Groundwater and Unsaturated Zone Monitoring Report for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” Letter, Alex O. Olsen, Amec, to Paul Turek, Chemical Waste Management, Inc. September 17, 2009. With enclosure: “Second Quarter 2009 Groundwater and Unsaturated Zone Monitoring Report for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” AMEC Geomatrix. September 17, 2009.
- k. “Third Quarter 2009 Groundwater and Unsaturated Zone Monitoring Report for Class I Waste Management Units. Kettleman Hills Facility, Kettleman City, California.” Letter, Alex O. Olsen, Geomatrix, to Paul Turek, Chemical Waste Management, Inc. December 22, 2008. With enclosure: “Third Quarter 2009 Groundwater and Unsaturated Zone Monitoring Report for Class I Waste Management Units. Kettleman Hills Facility, Kettleman City, California.” Geomatrix. December 22, 2009.
- l. “Fourth Quarter 2007 Groundwater and Unsaturated Zone Monitoring Report for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” Letter, Alex Olsen, AMEC, to Paul Turek, Chemical Waste Management, Inc. March 16, 2010. With enclosure: “Fourth Quarter 2007 Groundwater and Unsaturated Zone Monitoring Report for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” AMEC. March 16, 2010.
- m. “First Quarter 2010 Groundwater and Unsaturated Zone Monitoring Report for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” Letter, Alex O. Olsen, AMEC, to Paul Turek, Chemical Waste Management, Inc. June 18, 2010. With enclosure: “First Quarter 2010 Groundwater and Unsaturated Zone Monitoring Report for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” AMEC Geomatrix. June 18, 2010.
- n. “Second Quarter 2010 Groundwater and Unsaturated Zone Monitoring Report for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” Letter, Alex O. Olsen, AMEC, to Paul Turek, Chemical Waste Management, Inc. September 20, 2010. With enclosure: “Second Quarter 2010 Groundwater and Unsaturated Zone Monitoring Report for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” AMEC Geomatrix. September 20, 2010.





- o. “Third Quarter 2010 Groundwater and Unsaturated Zone Monitoring Report for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” Letter, Alex O. Olsen, AMEC, to Paul Turek, Chemical Waste Management, Inc. December 21, 2010. With enclosure: “Third Quarter 2010 Groundwater and Unsaturated Zone Monitoring Report for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” AMEC Geomatrix. December 21, 2010.
- p. “Chemical Waste Management, Inc. – Kettleman Hills Facility, Forth Quarter 2010 Groundwater and Unsaturated Zone Monitoring Report for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” Letter, Paul Turek, Chemical Waste Management, Inc to Executive Officer, Regional Water Quality Control Board. March 1, 2011. With enclosure: “Fourth Quarter 2010 Groundwater and Unsaturated Zone Monitoring Report for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” AMEC Geomatrix. March 1, 2011.
- q. “First Quarter 2011 Groundwater and Unsaturated Zone Monitoring Report for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” Letter, Bradley A. Loewen, AMEC, to Paul Turek, Chemical Waste Management, Inc. June 13, 2011. With enclosure: “First Quarter 2011 Groundwater and Unsaturated Zone Monitoring Report for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” AMEC Geomatrix. June 13, 2011.
- r. “Chemical Waste Management, Inc. – Kettleman Hills Facility, Second Quarter 2011 Groundwater and Unsaturated Zone Monitoring Report for Class 1 Waste Management Units.” Letter, Paul Turek, Chemical Waste Management, Inc to Executive Officer, Regional Water Quality Control Board. September 20, 2011. With enclosure: “Second Quarter 2011 Groundwater and Unsaturated Zone Monitoring Report for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” AMEC Geomatrix. September 19, 2011.
- s. “Third Quarter 2011 Groundwater and Unsaturated Zone Monitoring Report for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” Letter, Bradley A. Loewen, AMEC, to Paul Turek, Chemical Waste Management, Inc. December 20, 2011. With enclosure: “Third Quarter 2011 Groundwater and Unsaturated Zone Monitoring Report for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” AMEC Geomatrix. December 20, 2011.
- t. “Fourth Quarter 2011 Groundwater and Unsaturated Zone Monitoring Report for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” Letter, Bradley A. Loewen, AMEC, to Paul Turek, Chemical Waste Management, Inc. February 21, 2012. With enclosure: “Fourth Quarter 2011 Groundwater and Unsaturated Zone Monitoring Report for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” AMEC Geomatrix. February 21, 2012.



- u. “First Quarter 2012 Groundwater and Unsaturated Zone Monitoring Report for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” Letter, Bradley A. Loewen, AMEC, to Paul Turek, Chemical Waste Management, Inc. June 20, 2012. With enclosure: “First Quarter 2012 Groundwater and Unsaturated Zone Monitoring Report for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” AMEC Geomatrix. June 20, 2012.
- v. “Second Quarter 2012 Groundwater and Unsaturated Zone Monitoring Constituents of Concern Report for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” Letter, Bradley A. Loewen, AMEC, to Paul Turek, Chemical Waste Management, Inc. September 25, 2012. With enclosure: “Second Quarter 2012 Groundwater and Unsaturated Zone Monitoring and Constituents of Concern Report for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” AMEC. September 25, 2012.
- w. “Third Quarter 2012 Groundwater and Unsaturated Zone Monitoring Report for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” Letter, Bradley A. Loewen, AMEC, to Paul Turek, Chemical Waste Management, Inc. December 12, 2012. With enclosure: “Third Quarter 2012 Groundwater and Unsaturated Zone Monitoring Report for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” AMEC. December 12, 2012.
- x. “Fourth Quarter 2012 Groundwater and Unsaturated Zone Monitoring Report for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” Letter, Bradley A. Loewen, AMEC, to Paul Turek, Chemical Waste Management, Inc. February 26, 2013. With enclosure: “Fourth Quarter 2012 Groundwater and Unsaturated Zone Monitoring Report for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” AMEC Geomatrix. February 26, 2013.
- y. “First Quarter 2013 Groundwater and Unsaturated Zone Monitoring Report for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” Letter, Bradley A. Loewen, AMEC, to Paul Turek, Chemical Waste Management, Inc. June 25, 2013. With enclosure: “First Quarter 2013 Groundwater and Unsaturated Zone Monitoring Report for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” AMEC Geomatrix. June 25, 2013.
- z. “Second Quarter 2013 Groundwater and Unsaturated Zone Monitoring Report for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” Letter, Bradley A. Loewen, AMEC, to Paul Turek, Chemical Waste Management, Inc. September 17, 2013. With enclosure: “Second Quarter 2013 Groundwater and Unsaturated Zone Monitoring Report for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” AMEC. September 17, 2013.



- aa. “Third Quarter 2013 Groundwater and Unsaturated Zone Monitoring Report for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” Letter, Bradley A. Loewen, AMEC, to Paul Turek, Chemical Waste Management, Inc. December 19, 2013. With enclosure: “Third Quarter 2012 Groundwater and Unsaturated Zone Monitoring Report for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” AMEC. December 13, 2013.
- bb. “Fourth Quarter 2013 Groundwater and Unsaturated Zone Monitoring Report for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” Letter, Bradley A. Loewen, AMEC, to Paul Turek, Chemical Waste Management, Inc. February 25, 2014. With enclosure: “Fourth Quarter 2012 Groundwater and Unsaturated Zone Monitoring Report for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” AMEC Geomatrix. February 25, 2014.
- cc. “First Quarter 2014 Groundwater and Unsaturated Zone Monitoring Data Report,. Kettleman Hills Facility, Kings County, California.” Letter, Bradley A. Loewen, AMEC, to Paul Turek, Chemical Waste Management, Inc. June 27, 2014. With enclosures.
- dd. “First Semiannual 2014 Groundwater and Unsaturated Zone Monitoring for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” Letter, Bradley A. Loewen, AMEC, to Paul Turek, Chemical Waste Management, Inc. September 26, 2014. With enclosure: “First Semiannual 2014 Groundwater and Unsaturated Zone Monitoring for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” AMEC. September 26, 2014.
- ee. “Third Quarter 2014 Groundwater and Unsaturated Zone Monitoring Data Report,. Kettleman Hills Facility, Kings County, California.” Letter, Bradley A. Loewen, AMEC, to Paul Turek, Chemical Waste Management, Inc. December 8, 2014. With enclosures.
- ff. “Second Semiannual 2014 Groundwater and Unsaturated Zone Monitoring for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” Letter, Bradley A. Loewen, AMEC, to Paul Turek, Chemical Waste Management, Inc. February 25, 2015. With enclosure: “Second Semiannual 2014 Groundwater and Unsaturated Zone Monitoring for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” AMEC. February 23, 2015.
- gg. “First Quarter 2015 Groundwater and Unsaturated Zone Monitoring Data Report,. Kettleman Hills Facility, Kings County, California.” Letter, Bradley A. Loewen, AMEC, to Paul Turek, Chemical Waste Management, Inc. June 16, 2015. With enclosures.
- hh. “First Semiannual 2015 Groundwater and Unsaturated Zone Monitoring for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County,



- California.” Letter, Bradley A. Loewen, AMEC, to Paul Turek, Chemical Waste Management, Inc. September 21, 2015. With enclosure: “First Semiannual 2015 Groundwater and Unsaturated Zone Monitoring for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” AMEC. September 21, 2015.
- ii. “Second Semiannual 2015 Groundwater and Unsaturated Zone Monitoring for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” Letter, Bradley A. Loewen, AMEC, to Paul Turek, Chemical Waste Management, Inc. March 18, 2016. With enclosure: “Second Semiannual 2015 Groundwater and Unsaturated Zone Monitoring for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” AMEC. March 18, 2016.
- jj. “First Semiannual 2016 Groundwater and Unsaturated Zone Monitoring for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” Letter, Bradley A. Loewen, AMEC, to Reyna Verdin, Chemical Waste Management, Inc. September 22, 2016. With enclosure: “First Semiannual 2016 Groundwater and Unsaturated Zone Monitoring for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” AMEC. September 22, 2016.
- kk. “Chemical Waste Management, Inc. Kettleman Hills Facility, Third Quarter 2016 Monitoring Report for Class I Waste Management Units as Required by DTSC on March 6, 2015.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Permitting Division, Department of Toxic Substances Control. December 2, 2016. With enclosure: “Third Quarter 2016 Monitoring Report for Class I Waste Management Units as Required by DTSC on March 6, 2015.” AMEC. November 30, 2016.
- ll. “Chemical Waste Management, Inc. Kettleman Hills Facility, Fourth Quarter 2016 Monitoring and Constituents of Concern Report for Class I Waste Management Units as Required by DTSC on March 6, 2015.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Permitting Division, Department of Toxic Substances Control. February 28, 2017. With enclosure: “Fourth Quarter 2016 Monitoring and Constituents of Concern Report for Class I Waste Management Units as Required by DTSC on March 6, 2015.” AMEC. February 24, 2017.
- mm. “Chemical Waste Management, Inc. Kettleman Hills Facility, First Quarter 2017 Monitoring Report for Class I Waste Management Units as Required by DTSC on March 6, 2015.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Permitting Division, Department of Toxic Substances Control. June 26, 2017. With enclosure: “First Quarter 2017 Monitoring Report for Class I Waste Management Units as Required by DTSC on March 6, 2015.” AMEC. June 15, 2017.
- nn. “Chemical Waste Management, Inc. Kettleman Hills Facility, Second Quarter 2017 Monitoring Report for Class I Waste Management Units as Required by



- DTSC on March 6, 2015.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Ryan Batty, Department of Toxic Substances Control. September 15, 2017. With enclosure: “Second Quarter 2017 Monitoring Report for Class I Waste Management Units as Required by DTSC on March 6, 2015.” AMEC. September 13, 2017.
- oo. “Chemical Waste Management, Inc. Kettleman Hills Facility, First Semiannual 2017 Groundwater and UZ Monitoring – Class 1 Waste Management Units.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Permitting Division, Department of Toxic Substances Control. September 28, 2017. With enclosure: “First Semiannual 2017 Groundwater and Unsaturated Zone Monitoring for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” AMEC. September 27, 2017.
- pp. “Chemical Waste Management, Inc. Kettleman Hills Facility, Third Quarter 2017 Monitoring Report for Class I Waste Management Units as Required by Department of Toxic Substances Control on March 6, 2015.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Ryan Batty, Department of Toxic Substances Control. December 22, 2017. With enclosure: “Third Quarter 2017 Monitoring Report for Class I Waste Management Units as Required by DTSC on March 6, 2015.” AMEC. December 20, 2017.
- qq. “Chemical Waste Management, Inc. Kettleman Hills Facility, Fourth Quarter 2017 Monitoring Report for Class I Waste Management Units as Required by DTSC on March 6, 2015.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Ryan Batty, Department of Toxic Substances Control. February 28, 2018. With enclosure: “Fourth Quarter 2017 Monitoring Report for Class I Waste Management Units as Required by DTSC on March 6, 2015.” AMEC. February 23, 2018.
- rr. “Chemical Waste Management, Inc. Kettleman Hills Facility, Second Semiannual 2017 Groundwater and UZ Monitoring – Class 1 Waste Management Units.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Permitting Division, Department of Toxic Substances Control. March 29, 2018. With enclosure: “Second Semiannual 2017 Groundwater and Unsaturated Zone Monitoring for Class 1 Waste Management Units. Kettleman Hills Facility, Kings County, California.” AMEC. March 26, 2018.
- ss. “Chemical Waste Management, Inc. Kettleman Hills Facility, First Quarter 2018 Monitoring Report for Class I Waste Management Units as Required by DTSC on March 6, 2015.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Ryan Batty, Department of Toxic Substances Control. June 26, 2018. With enclosure: “First Quarter 2018 Monitoring Report for Class I Waste Management Units as Required by DTSC on March 6, 2015.” Wood. June 21, 2018.
- tt. “Chemical Waste Management, Inc. Kettleman Hills Facility, Second Quarter 2018 Monitoring Report for Class I Waste Management Units as Required by DTSC on March 6, 2015.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Ryan Batty, Department of Toxic Substances Control. September 21,



2018. With enclosure: “Second Quarter 2018 Monitoring Report for Class I Waste Management Units as Required by DTSC on March 6, 2015.” Wood. September 21, 2018.
- uu. “Chemical Waste Management, Inc. Kettleman Hills Facility, Third Quarter 2018 Monitoring Report for Class I Waste Management Units as Required by DTSC on March 6, 2015.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Ryan Batty, Department of Toxic Substances Control. December 19, 2018. With enclosure: “Third Quarter 2018 Monitoring Report for Class I Waste Management Units as Required by DTSC on March 6, 2015.” Wood. December 13, 2018.
- vv. “Chemical Waste Management, Inc. Kettleman Hills Facility, Fourth Quarter 2018 Monitoring Report for Class I Waste Management Units as Required by DTSC on March 6, 2015.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Ryan Batty, Department of Toxic Substances Control. February 21, 2019. With enclosure: “Fourth Quarter 2018 Monitoring Report for Class I Waste Management Units as Required by DTSC on March 6, 2015.” Wood. February 18, 2019.
- ww. “Chemical Waste Management, Inc. Kettleman Hills Facility, First Quarter 2019 Monitoring Report for Class I Waste Management Units as Required by DTSC on March 6, 2015.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Camille Rogado, Department of Toxic Substances Control. June 27, 2019. With enclosure: “First Quarter 2019 Monitoring Report for Class I Waste Management Units as Required by DTSC on March 6, 2015.” Wood. June 21, 2019.
3. Other Documents Related Groundwater Monitoring Results
- a. “Kettleman City Well Question.” Email, Jim Dowdall, Regional Water Quality Control Board, to Edwin Poalinelli, U.S. EPA Region 9. July 30, 2010.
- b. “Notifications correspondence from KHF to EPA-IX for PCB detections in groundwater monitoring results and leachate analytic results for TSCA-regulated units from 1992 – 2018. Compiled by Chemical Waste Management, Inc. October 2, 2018.

## **C. LEACHATE MONITORING REPORTS**

1. Annual LCRS Fluid Analysis Reports
- a. “Chemical Waste Management, Inc. – Kettleman Hills Facility 2009 Annual LCRS Fluid Analysis Report.” Letter, Paul Turek, Chemical Waste Management, Inc. to Jim Dowdall, Regional Water Quality Control Board. April 9, 2010. With enclosures.
- b. “Chemical Waste Management, Inc. – Kettleman Hills Facility 2010 Annual LCRS Fluid Analysis Report.” Letter, Paul Turek, Chemical Waste Management, Inc. to Jim Dowdall, Regional Water Quality Control Board. April 19, 2011. With enclosures.





- c. “Chemical Waste Management, Inc. – Kettleman Hills Facility Corrections to 2010 Annual LCRS Fluid Analysis Report.” Letter, Paul Turek, Chemical Waste Management, Inc. to Jim Dowdall, Regional Water Quality Control Board. May 5, 2011. With enclosures.
  - d. “Chemical Waste Management, Inc. – Kettleman Hills Facility 2012 Annual LCRS Fluid Analysis Report.” Letter, Paul Turek, Chemical Waste Management, Inc. to Dean Hubbard, Regional Water Quality Control Board. April 8, 2013. With enclosures.
  - e. “Chemical Waste Management, Inc. – Kettleman Hills Facility 2014 Annual LCRS Fluid Analysis Report.” Letter, Paul Turek, Chemical Waste Management, Inc. to Daniel Carlson, Regional Water Quality Control Board. April 16, 2015. With enclosures.
  - f. “Chemical Waste Management, Inc. – Kettleman Hills Facility 2015 Annual LCRS Fluid Analysis Report.” Letter, Paul Turek, Chemical Waste Management, Inc. to Daniel Carlson, Regional Water Quality Control Board. April 28, 2016. With enclosures.
  - g. “Chemical Waste Management, Inc. – Kettleman Hills Facility 2016 Annual LCRS Fluid Analysis Report.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Daniel Carlson, Regional Water Quality Control Board. April 27, 2017. With enclosures.
  - h. “Chemical Waste Management, Inc. – Kettleman Hills Facility 2017 Annual LCRS Fluid Analysis Report.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Daniel Carlson, Regional Water Quality Control Board. May 1, 2018. With enclosures.
  - i. “Chemical Waste Management, Inc. – Kettleman Hills Facility 2018 Annual LCRS Fluid Analysis Report.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Daniel Carlson, Regional Water Quality Control Board. April 30, 2019. With enclosures.
2. Annual Monitoring Report and LCRS Integrity Report
- a. “Chemical Waste Management, Inc. – Kettleman Hills Facility 2012 Annual Monitoring Summary Report & LCRS Integrity Testing.” Letter, Paul Turek, Chemical Waste Management, Inc. to Regional Water Quality Control Board. February 27, 2012. With enclosure.
  - b. “Chemical Waste Management, Inc. – Kettleman Hills Facility 2014 Annual Monitoring Summary Report & LCRS Integrity Testing.” Letter, Paul Turek, Chemical Waste Management, Inc. to Regional Water Quality Control Board. February 26, 2014. With enclosure.
  - c. “Chemical Waste Management, Inc. – Kettleman Hills Facility 2015 Annual Monitoring Summary Report & LCRS Integrity Testing.” Letter, Paul Turek, Chemical Waste Management, Inc. to Regional Water Quality Control Board. February 27, 2015. With enclosure.



- d. “Chemical Waste Management, Inc. – Kettleman Hills Facility 2016 Annual Monitoring Summary Report & LCRS Integrity Testing.” Letter, Paul Turek, Chemical Waste Management, Inc. to Regional Water Quality Control Board. February 26, 2016. With enclosure.
  - e. “Chemical Waste Management, Inc. – Kettleman Hills Facility 2017 Annual Monitoring Summary Report & LCRS Integrity Testing.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Regional Water Quality Control Board. February 28, 2017. With enclosure.
  - f. “Chemical Waste Management, Inc. – Kettleman Hills Facility 2018 Annual Monitoring Summary Report & LCRS Integrity Testing.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Regional Water Quality Control Board. February 28, 2018. With enclosure.
  - g. “Chemical Waste Management, Inc. – Kettleman Hills Facility 2019 Annual Monitoring Summary Report & LCRS Integrity Testing.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Regional Water Quality Control Board. February 28, 2019. With enclosure.
3. Monthly Monitoring Reports
- a. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – May 2014.” Letter, John Prill, Chemical Waste Management, Inc. to Dan Carlson, Regional Water Quality Control Board. June 9, 2014. With enclosures.
  - b. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – June 2014.” Letter, John Prill, Chemical Waste Management, Inc. to Dan Carlson, Regional Water Quality Control Board. July 11, 2014. With enclosures.
  - c. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – July 2014.” Letter, John Prill, Chemical Waste Management, Inc. to Dan Carlson, Regional Water Quality Control Board. August 13, 2014. With enclosures.
  - d. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – August 2014.” Letter, John Prill, Chemical Waste Management, Inc. to Dan Carlson, Regional Water Quality Control Board. September 10, 2014. With enclosures.
  - e. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – September 2014.” Letter, John Prill, Chemical Waste Management, Inc. to Dan Carlson, Regional Water Quality Control Board. October 24, 2014. With enclosures.
  - f. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – October 2014.” Letter, John Prill, Chemical Waste Management, Inc. to Dan Carlson, Regional Water Quality Control Board. November 12, 2014. With enclosures.



- g. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – November 2014.” Letter, John Prill, Chemical Waste Management, Inc. to Dan Carlson, Regional Water Quality Control Board. December 11, 2014. With enclosures.
- h. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – December 2014.” Letter, John Prill, Chemical Waste Management, Inc. to Dan Carlson, Regional Water Quality Control Board. January 14, 2015. With enclosures.
- i. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – January 2015.” Letter, John Prill, Chemical Waste Management, Inc. to Dan Carlson, Regional Water Quality Control Board. February 10, 2015. With enclosures.
- j. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – February 2015.” Letter, John Prill, Chemical Waste Management, Inc. to Dan Carlson, Regional Water Quality Control Board. March 12, 2015. With enclosures.
- k. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – March 2015.” Letter, John Prill, Chemical Waste Management, Inc. to Dan Carlson, Regional Water Quality Control Board. April 14, 2015. With enclosures.
- l. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – April 2015.” Letter, John Prill, Chemical Waste Management, Inc. to Dan Carlson, Regional Water Quality Control Board. May 14, 2015. With enclosures.
- m. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – May 2015.” Letter, John Prill, Chemical Waste Management, Inc. to Dan Carlson, Regional Water Quality Control Board. June 9, 2015. With enclosures.
- n. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – June 2015.” Letter, John Prill, Chemical Waste Management, Inc. to Dan Carlson, Regional Water Quality Control Board. July 14, 2015. With enclosures.
- o. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – July 2015.” Letter, John Prill, Chemical Waste Management, Inc. to Dan Carlson, Regional Water Quality Control Board. August 12, 2015. With enclosures.
- p. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – August 2015.” Letter, John Prill, Chemical Waste Management, Inc. to Dan Carlson, Regional Water Quality Control Board. September 14, 2015. With enclosures.



- q. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – September 2015.” Letter, John Prill, Chemical Waste Management, Inc. to Dan Carlson, Regional Water Quality Control Board. October 14, 2015. With enclosures.
- r. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – October 2015.” Letter, John Prill, Chemical Waste Management, Inc. to Dan Carlson, Regional Water Quality Control Board. November 12, 2015. With enclosures.
- s. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – November 2015.” Letter, John Prill, Chemical Waste Management, Inc. to Dan Carlson, Regional Water Quality Control Board. December 14, 2015. With enclosures.
- t. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – December 2015.” Letter, John Prill, Chemical Waste Management, Inc. to Dan Carlson, Regional Water Quality Control Board. January 11, 2016. With enclosures.
- u. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – January 2016.” Letter, John Prill, Chemical Waste Management, Inc. to Dan Carlson, Regional Water Quality Control Board. February 12, 2016. With enclosures.
- v. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – February 2016.” Letter, John Prill, Chemical Waste Management, Inc. to Dan Carlson, Regional Water Quality Control Board. March 14, 2016. With enclosures.
- w. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – March 2016.” Letter, John Prill, Chemical Waste Management, Inc. to Dan Carlson, Regional Water Quality Control Board. April 14, 2016. With enclosures.
- x. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – April 2016.” Letter, John Prill, Chemical Waste Management, Inc. to Dan Carlson, Regional Water Quality Control Board. May 11, 2016. With enclosures.
- y. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – May 2016.” Letter, John Prill, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. June 10, 2016. With enclosures.
- z. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – June 2016.” Letter, John Prill, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. July 13, 2016. With enclosures.



- aa. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – July 2016.” Letter, John Prill, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. August 11, 2016. With enclosures.
- bb. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – August 2016.” Letter, John Prill, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. September 15, 2016. With enclosures.
- cc. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – September 2016.” Letter, John Prill, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. October 12, 2016. With enclosures.
- dd. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – October 2016.” Letter, John Prill, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. November 11, 2016. With enclosures.
- ee. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – November 2016.” Letter, John Prill, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. December 14, 2016. With enclosures.
- ff. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – December 2016.” Letter, John Prill, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. January 11, 2017. With enclosures.
- gg. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – January 2017.” Letter, John Prill, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. February 14, 2017. With enclosures.
- hh. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – February 2017.” Letter, John Prill, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. March 13, 2017. With enclosures.
- ii. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – March 2016.” Letter, John Prill, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. April 14, 2016. With enclosures.
- jj. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – April 2017.” Letter, John Prill, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. May 15, 2017. With enclosures.



- kk. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – May 2017.” Letter, John Prill, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. June 13, 2017. With enclosures.
- ll. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – June 2017.” Letter, John Prill, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. July 13, 2017. With enclosures.
- mm. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – July 2017.” Letter, John Prill, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. August 14, 2017. With enclosures.
- nn. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – August 2017.” Letter, John Prill, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. September 14, 2017. With enclosures.
- oo. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – September 2017.” Letter, John Prill, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. October 13, 2017. With enclosures.
- pp. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – October 2017.” Letter, John Prill, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. November 14, 2017. With enclosures.
- qq. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – November 2017.” Letter, John Prill, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. December 14, 2017. With enclosures.
- rr. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – December 2017.” Letter, John Prill, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. January 11, 2018. With enclosures.
- ss. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – January 2018.” Letter, John Prill, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. February 13, 2018. With enclosures.
- tt. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – February 2018.” Letter, John Prill, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. March 14, 2018. With enclosures.





- uu. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – March 2018.” Letter, John Prill, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. April 13, 2018. With enclosures.
- vv. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – April 2018.” Letter, John Prill, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. May 14, 2018. With enclosures.
- ww. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – May 2018.” Letter, John Prill, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. June 14, 2018. With enclosures.
- xx. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – June 2018.” Letter, John Prill, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. July 11, 2018. With enclosures.
- yy. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – July 2018.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. August 13, 2018. With enclosures.
- zz. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – Correction to July 2018 Report” Letter, John Prill, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. August 22, 2018. With enclosures.
- aaa. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – August 2018.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. September 13, 2018. With enclosures.
- bbb. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – September 2018.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. October 15, 2018. With enclosures.
- ccc. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – October 2018.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. November 9, 2018. With enclosures.
- ddd. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – November 2018.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. December 11, 2018. With enclosures.



- eee. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – December 2018.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. January 10, 2019. With enclosures
- fff. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – January 2019.” Letter, John Prill, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. February 14, 2019. With enclosures.
- ggg. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – February 2019.” Letter, John Prill, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. March 14, 2019. With enclosures.
- hhh. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – March 2019.” Letter, John Prill, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. April 15, 2019. With enclosures.
- iii. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – April 2019.” Letter, John Prill, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. May 14, 2019. With enclosures.
- jjj. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – May 2019.” Letter, John Prill, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. June 14, 2019. With enclosures.
- kkk. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – June 2019.” Letter, John Prill, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. July 15, 2019. With enclosures.
- lll. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly Monitoring Report – July 2019.” Letter, John Prill, Chemical Waste Management, Inc. to Kristen Gomes, Regional Water Quality Control Board. August 15, 2019. With enclosures.

#### **D. AIR MONITORING REPORTS**

1. “Chemical Waste Management, Inc. – Kettleman Hills Facility Ambient Air Monitoring Program – Fourth Quarter 2010 Report.” Letter, Paul Turek, Chemical Waste Management, Inc. to Wayne Lorentzen, Department of Toxic Substances Control. March 25, 2011. With enclosure: “Quarterly Ambient Air Monitoring Program Data Report January 2011 – March 2011 Chemical Waste Management, Inc. Kettleman Hills Facility (KHF).” Wenck Associates, Inc. June 2011.



2. “Quarterly Ambient Air Monitoring Program Data Report January 2011 – March 2011 Chemical Waste Management, Inc. Kettleman Hills Facility (KHF).” Wenck Associates, Inc. June 2011.
3. “Quarterly Ambient Air Monitoring Program Data Report April 2011 – June 2011 Chemical Waste Management, Inc. Kettleman Hills Facility (KHF).” Wenck Associates, Inc. September 2011.
4. “Chemical Waste Management, Inc. – Kettleman Hills Facility Ambient Air Monitoring Program – Third Quarter 2011 Report.” Letter, Paul Turek, Chemical Waste Management, Inc. to Wayne Lorentzen, Department of Toxic Substances Control. December 23, 2011. With enclosure: “Quarterly Ambient Air Monitoring Program Data Report July 2011 -September 2011 Chemical Waste Management, Inc. Kettleman Hills Facility (KHF).” Wenck Associates, Inc. December 2011.
5. “Quarterly Ambient Air Monitoring Program Data Report September 2011 – December 2011 Chemical Waste Management, Inc. Kettleman Hills Facility (KHF).” Wenck Associates, Inc. March 2012.
6. “Quarterly Ambient Air Monitoring Program Data Report January 2012 – March 2012 Chemical Waste Management, Inc. Kettleman Hills Facility (KHF).” Wenck Associates, Inc. June 2012.
7. “Quarterly Ambient Air Monitoring Program Data Report April 2012 – June 2012 Chemical Waste Management, Inc. Kettleman Hills Facility (KHF).” Wenck Associates, Inc. August 2012.
8. “Quarterly Ambient Air Monitoring Program Data Report July 2012 -September 2012 Chemical Waste Management, Inc. Kettleman Hills Facility (KHF).” Wenck Associates, Inc. November 2012.
9. “Chemical Waste Management, Inc. – Kettleman Hills Facility Ambient Air Monitoring Program – Forth Quarter 2012 Report.” Letter, Paul Turek, Chemical Waste Management, Inc. to Wayne Lorentzen, Department of Toxic Substances Control. March 5, 2013. With enclosure: “Quarterly Ambient Air Monitoring Program Data Report October 2012 – December 2012 Chemical Waste Management, Inc. Kettleman Hills Facility (KHF).” Wenck Associates, Inc. March 2013.
10. “Chemical Waste Management, Inc. – Kettleman Hills Facility Ambient Air Monitoring Program – First Quarter 2013 Report.” Letter, Paul Turek, Chemical Waste Management, Inc. to Wayne Lorentzen, Department of Toxic Substances Control. June 5, 2013. With enclosure: “Quarterly Ambient Air Monitoring Program Data Report January 2013 – March 2013 Chemical Waste Management, Inc. Kettleman Hills Facility (KHF).” Wenck Associates, Inc. May 2013.
11. “Chemical Waste Management, Inc. – Kettleman Hills Facility Ambient Air Monitoring Program – Second Quarter 2013 Report.” Letter, Paul Turek, Chemical Waste Management, Inc. to Wayne Lorentzen, Department of Toxic Substances Control. August 30, 2013. With enclosure: “Quarterly Ambient Air Monitoring Program Data Report April 2013 -June 2013 Chemical Waste Management, Inc. Kettleman Hills Facility (KHF).” Wenck Associates, Inc. August 2013.



12. “Chemical Waste Management, Inc. – Kettleman Hills Facility Ambient Air Monitoring Program – Third Quarter 2013 Report.” Letter, Paul Turek, Chemical Waste Management, Inc. to Wayne Lorentzen, Department of Toxic Substances Control. December 4, 2013. With enclosure: “Quarterly Ambient Air Monitoring Program Data Report July 2013 -September 2013 Chemical Waste Management, Inc. Kettleman Hills Facility (KHF).” Wenck Associates, Inc. December 2013.
13. “Chemical Waste Management, Inc. – Kettleman Hills Facility Ambient Air Monitoring Program – Fourth Quarter 2013 Report.” Letter, Paul Turek, Chemical Waste Management, Inc. to Wayne Lorentzen, Department of Toxic Substances Control. March 4, 2014. With enclosure: “Quarterly Ambient Air Monitoring Program Data Report October 2013 – December 2013 Chemical Waste Management, Inc. Kettleman Hills Facility (KHF).” Wenck Associates, Inc. February 2014.
14. “Chemical Waste Management, Inc. – Kettleman Hills Facility Ambient Air Monitoring Program – First Quarter 2014 Report.” Letter, Paul Turek, Chemical Waste Management, Inc. to Wayne Lorentzen, Department of Toxic Substances Control. June 9, 2014. With enclosure: “Quarterly Ambient Air Monitoring Program Data Report January 2014 -March 2014 Chemical Waste Management, Inc. Kettleman Hills Facility (KHF).” Wenck Associates, Inc. May 2014.
15. “Chemical Waste Management, Inc. – Kettleman Hills Facility Ambient Air Monitoring Program – Second Quarter 2014 Report.” Letter, Paul Turek, Chemical Waste Management, Inc. to Muzhda Ferouz, Department of Toxic Substances Control. September 4, 2014. With enclosure: “Quarterly Ambient Air Monitoring Program Data Report April 2014 – June 2014 Chemical Waste Management, Inc. Kettleman Hills Facility (KHF).” Wenck Associates, Inc. August 2014.
16. “Chemical Waste Management, Inc. – Kettleman Hills Facility Ambient Air Monitoring Program – Third Quarter 2014 Report.” Letter, Paul Turek, Chemical Waste Management, Inc. to Muzhda Ferouz, Department of Toxic Substances Control. December 5, 2014. With enclosure: “Quarterly Ambient Air Monitoring Program Data Report July 2014 – September 2014 Chemical Waste Management, Inc. Kettleman Hills Facility (KHF).” Wenck Associates, Inc. December 2014.
17. “Chemical Waste Management, Inc. – Kettleman Hills Facility Ambient Air Monitoring Program – Fourth Quarter 2014 Report.” Letter, Paul Turek, Chemical Waste Management, Inc. to Muzhda Ferouz, Department of Toxic Substances Control. March 4, 2014. With enclosure: “Ambient Air Monitoring Program Quarterly Report October 2014 – December 2015 Chemical Waste Management, Inc. Kettleman Hills Facility (KHF).” Wenck Associates, Inc. February 2015.
18. “Ambient Air Monitoring Program Quarterly Report January 2015 – March 2015 Chemical Waste Management, Inc. Kettleman Hills Facility (KHF).” Wenck Associates, Inc. June 2015.
19. “Ambient Air Monitoring Program Quarterly Report April 2015 -June 2015 Chemical Waste Management, Inc. Kettleman Hills Facility (KHF).” Wenck Associates, Inc. September 2015.



20. “Ambient Air Monitoring Program Quarterly Report July 2015 – September 2015 Chemical Waste Management, Inc. Kettleman Hills Facility (KHF).” Wenck Associates, Inc. December 2015.
21. “Ambient Air Monitoring Program Quarterly Report October 2015 – December 2015 Chemical Waste Management, Inc. Kettleman Hills Facility (KHF).” Wenck Associates, Inc. March 2016.
22. “Chemical Waste Management, Inc. – Kettleman Hills Facility Ambient Air Monitoring Program – First Quarter 2016 Report.” Letter, Paul Turek, Chemical Waste Management, Inc. to Muzhda Ferouz, Department of Toxic Substances Control. June 23, 2016. With enclosure: “Ambient Air Monitoring Program Quarterly Report January 2016 – March 2016 Chemical Waste Management, Inc. Kettleman Hills Facility (KHF).” Wenck Associates, Inc. June 2016.
23. “Chemical Waste Management, Inc. – Kettleman Hills Facility Ambient Air Monitoring Program – Second Quarter 2016 Report.” Letter, Paul Turek, Chemical Waste Management, Inc. to Muzhda Ferouz, Department of Toxic Substances Control. September 22, 2016. With enclosure: “Ambient Air Monitoring Program Quarterly Report April 2016 – June 2016 Chemical Waste Management, Inc. Kettleman Hills Facility (KHF).” Wenck Associates, Inc. September 2016.
24. “Ambient Air Monitoring Program Quarterly Report July 2016 – September 2016 Chemical Waste Management, Inc. Kettleman Hills Facility (KHF).” Wenck Associates, Inc. December 2016.
25. “Ambient Air Monitoring Program Quarterly Report October 2016 – December 2016 Chemical Waste Management, Inc. Kettleman Hills Facility (KHF).” Wenck Associates, Inc. March 2017.
26. “Ambient Air Monitoring Program Quarterly Report January 2017 – March 2017 Chemical Waste Management, Inc. Kettleman Hills Facility (KHF).” Wenck Associates, Inc. June 2017.
27. “Ambient Air Monitoring Program Quarterly Report April 2017 – June 2017 Chemical Waste Management, Inc. Kettleman Hills Facility (KHF).” Wenck Associates, Inc. September 2017.
28. “Ambient Air Monitoring Program Quarterly Report July 2017 – September 2017 Chemical Waste Management, Inc. Kettleman Hills Facility (KHF).” Wenck Associates, Inc. December 2017.
29. “Ambient Air Monitoring Program Quarterly Report October 2017 – December 2017 Chemical Waste Management, Inc. Kettleman Hills Facility (KHF).” Wenck Associates, Inc. March 2018.
30. “Chemical Waste Management, Inc. – Kettleman Hills Facility Ambient Air Monitoring Program – First Quarter 2018 Report.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Ryan Batty, Department of Toxic Substances Control. June 27, 2018. With enclosure: “Ambient Air Monitoring Program Quarterly Report January 2018 – March 2018 Chemical Waste Management, Inc. Kettleman Hills Facility (KHF).” Wenck Associates, Inc. June 2018.



31. “Chemical Waste Management, Inc. – Kettleman Hills Facility Ambient Air Monitoring Program – Second Quarter 2018 Report.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Ryan Batty, Department of Toxic Substances Control. September 24, 2018. With enclosure: “Ambient Air Monitoring Program Quarterly Report April 2018 – June 2018 Chemical Waste Management, Inc. Kettleman Hills Facility (KHF).” Wenck Associates, Inc. September 2018.
32. “Chemical Waste Management, Inc. – Kettleman Hills Facility Re: Response to DTSC Review of Ambient Air Monitoring Program Quarterly Report, January 2018-March 2018.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Ryan Batty, Department of Toxic Substances Control. November 2, 2018.
33. “Chemical Waste Management, Inc. – Kettleman Hills Facility Ambient Air Monitoring Program – Third Quarter 2018 Report.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Ryan Batty, Department of Toxic Substances Control. December 21, 2018. With enclosure: “Ambient Air Monitoring Program Quarterly Report July 2018 – September 2018 Chemical Waste Management, Inc. Kettleman Hills Facility (KHF).” Wenck Associates, Inc. December 2018.
34. “Chemical Waste Management, Inc. – Kettleman Hills Facility Ambient Air Monitoring Program – Fourth Quarter 2018 Report.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Camille Rogado, Department of Toxic Substances Control. March 27, 2019. With enclosure: “Ambient Air Monitoring Program Quarterly Report October 2018 – December 2018 Chemical Waste Management, Inc. Kettleman Hills Facility (KHF).” Wenck Associates, Inc. March 2019.
35. “Chemical Waste Management, Inc. – Kettleman Hills Facility Ambient Air Monitoring Program – First Quarter 2019 Report.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Camille Rogado, Department of Toxic Substances Control. June 27, 2019. With enclosure: “Ambient Air Monitoring Program Quarterly Report January 2019 – March 2019 Chemical Waste Management, Inc. Kettleman Hills Facility (KHF).” Wenck Associates, Inc. June 2019.

## **E. MONTHLY AND ANNUAL PCB REPORTS**

### **1. Monthly PCB Reports**

- a. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly TSCA Monitoring Report – January 2008.” Letter, Paul Turek, Chemical Waste Management, Inc. to Max Weintraub, U.S. EPA Region 9. February 13, 2008.
- b. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly TSCA Monitoring Report – February 2008.” Letter, Paul Turek, Chemical Waste Management, Inc. to Max Weintraub, U.S. EPA Region 9. March 12, 2008.
- c. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly TSCA Monitoring Report – March 2008.” Letter, Paul Turek, Chemical Waste Management, Inc. to Max Weintraub, U.S. EPA Region 9. April 10, 2008.





- d. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly TSCA Monitoring Report – April 2009.” Letter, Paul Turek, Chemical Waste Management, Inc. to Max Weintraub, U.S. EPA Region 9. May 15, 2008.
- e. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly TSCA Monitoring Report – May 2008.” Letter, Paul Turek, Chemical Waste Management, Inc. to Max Weintraub, U.S. EPA Region 9. June 13, 2008.
- f. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly TSCA Monitoring Report – June 2006.” Letter, Paul Turek, Chemical Waste Management, Inc. to Max Weintraub, U.S. EPA Region 9. July 15, 2008.
- g. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly TSCA Monitoring Report – July 2008.” Letter, Paul Turek, Chemical Waste Management, Inc. to Max Weintraub, U.S. EPA Region 9. August 14, 2008.
- h. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly TSCA Monitoring Report – August 2008.” Letter, Paul Turek, Chemical Waste Management, Inc. to Max Weintraub, U.S. EPA Region 9. September 15, 2008.
- i. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly TSCA Monitoring Report – September 2008.” Letter, Paul Turek, Chemical Waste Management, Inc. to Cheryl Nelson, U.S. EPA Region 9. October 14, 2008.
- j. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly TSCA Monitoring Report – October 2008.” Letter, Paul Turek, Chemical Waste Management, Inc. to Cheryl Nelson, U.S. EPA Region 9. November 12, 2008.
- k. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly TSCA Monitoring Report – November 2008.” Letter, Paul Turek, Chemical Waste Management, Inc. to Cheryl Nelson, U.S. EPA Region 9. December 11, 2008.
- l. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly TSCA Monitoring Report – December 2008.” Letter, Paul Turek, Chemical Waste Management, Inc. to Cheryl Nelson, U.S. EPA Region 9. January 12, 2009.
- m. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly TSCA Monitoring Report – January 2009.” Letter, Paul Turek, Chemical Waste Management, Inc. to Cheryl Nelson, U.S. EPA Region 9. February 12, 2009.
- n. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly TSCA Monitoring Report – February 2009.” Letter, Paul Turek, Chemical Waste Management, Inc. to Cheryl Nelson, U.S. EPA Region 9. March 14, 2009.
- o. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly TSCA Monitoring Report – March 2009.” Letter, Paul Turek, Chemical Waste Management, Inc. to Cheryl Nelson, U.S. EPA Region 9. April 14, 2009.
- p. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly TSCA Monitoring Report – April 2009.” Letter, Paul Turek, Chemical Waste Management, Inc. to Cheryl Nelson, U.S. EPA Region 9. May 15, 2009.



- q. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly TSCA Monitoring Report – May 2009.” Letter, Paul Turek, Chemical Waste Management, Inc. to Cheryl Nelson, U.S. EPA Region 9. June 11, 2009.
- r. “Chemical Waste Management, Inc. – Kettleman Hills Facility Monthly TSCA Monitoring Report – June 2009.” Letter, Paul Turek, Chemical Waste Management, Inc. to Cheryl Nelson, U.S. EPA Region 9. July 14, 2009.
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## 2. Annual PCB Reports

- a. “Chemical Waste Management, Inc., (CWMI)-Kettleman Hills Facility (KHF) CAT 000 646 111 2005 PCB Annual Report.” Letter, Tracy Reddick, Chemical Waste Management, Inc. to Regional Administrator, U.S. EPA Region 9. June 21, 2006. With enclosure: “2005 PCB Annual Report.” Chemical Waste Management, Inc.
- b. “Chemical Waste Management, Inc., (CWMI)-Kettleman Hills Facility (KHF) CAT 000 646 111 2006 PCB Annual Report.” Letter, Tracy Reddick, Chemical Waste Management, Inc. to Regional Administrator, U.S. EPA Region 9. June 26, 2007. With enclosure: “2006 PCB Annual Report.” Chemical Waste Management, Inc.
- c. “Chemical Waste Management, Inc., (CWMI)-Kettleman Hills Facility (KHF) CAT 000 646 111 2007 PCB Annual Report.” Letter, Tracy Reddick, Chemical Waste Management, Inc. to Regional Administrator, U.S. EPA Region 9. August 4, 2008. With enclosure: “2007 PCB Annual Report.” Chemical Waste Management, Inc.
- d. “Chemical Waste Management, Inc., (CWMI)-Kettleman Hills Facility (KHF) CAT 000 646 111 2008 PCB Annual Report.” Letter, Tracy Reddick, Chemical Waste Management, Inc. to Regional Administrator, U.S. EPA Region 9. July 15, 2009. With enclosure: “2008 PCB Annual Report.” Chemical Waste Management, Inc.
- e. “Chemical Waste Management, Inc., (CWMI)-Kettleman Hills Facility (KHF) CAT 000 646 111 2009 PCB Annual Report.” Letter, Tracy Reddick, Chemical Waste Management, Inc. to Regional Administrator, U.S. EPA Region 9. July 8, 2010. With enclosure: “2009 PCB Annual Report.” Chemical Waste Management, Inc.
- f. “Chemical Waste Management, Inc., (CWMI)-Kettleman Hills Facility (KHF) CAT 000 646 111 2010 PCB Annual Report.” Letter, Tracy Reddick, Chemical Waste Management, Inc. to Regional Administrator, U.S. EPA Region 9. July 13, 2011. With enclosure: “2010 PCB Annual Report.” Chemical Waste Management, Inc.
- g. “Chemical Waste Management, Inc., (CWMI)-Kettleman Hills Facility (KHF) CAT 000 646 111 2011 PCB Annual Report.” Letter, Tracy Reddick, Chemical Waste Management, Inc. to Regional Administrator, U.S. EPA Region 9. July 6, 2012. With enclosure: “2011 PCB Annual Report.” Chemical Waste Management, Inc.
- h. “Chemical Waste Management, Inc., (CWMI)-Kettleman Hills Facility (KHF) CAT 000 646 111 2012 PCB Annual Report.” Letter, Tracy Reddick, Chemical



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  - k. “Chemical Waste Management, Inc., (CWMI)-Kettleman Hills Facility (KHF) CAT 000 646 111 2015 PCB Annual Report.” Letter, Tracy Reddick, Chemical Waste Management, Inc. to Regional Administrator, U.S. EPA Region 9. July 20, 2016. With enclosure: “2015 PCB Annual Report.” Chemical Waste Management, Inc.
  - l. “Chemical Waste Management, Inc., (CWMI)-Kettleman Hills Facility (KHF) CAT 000 646 111 2016 PCB Annual Report.” Letter, Tracy Reddick, Chemical Waste Management, Inc. to Regional Administrator, U.S. EPA Region 9. July 5, 2017. With enclosure: “2016 PCB Annual Report.” Chemical Waste Management, Inc.
  - m. “Chemical Waste Management, Inc., (CWMI)-Kettleman Hills Facility (KHF) CAT 000 646 111 2017 PCB Annual Report.” Letter, Tracy Reddick, Chemical Waste Management, Inc. to Regional Administrator, U.S. EPA Region 9. July 9, 2018. With enclosure: “2017 PCB Annual Report.” Chemical Waste Management, Inc.
  - n. “Chemical Waste Management, Inc., (CWMI)-Kettleman Hills Facility (KHF) CAT 000 646 111 2018 PCB Annual Report.” Letter, Tracy Reddick, Chemical Waste Management, Inc. to Regional Administrator, U.S. EPA Region 9. July 11, 2019. With enclosure: “2018 PCB Annual Report.” Chemical Waste Management, Inc.

## **IX. ENVIRONMENTAL AND PUBLIC HEALTH STUDIES**

### **A. 2010 DIOXIN-LIKE PCB CONGENERS STUDY**

- 1. “Risk Analysis.” Letter, Paula Bisson, U.S. EPA Region 9, to Paul Turek, Chemical Waste Management, Inc. September 8, 2006.
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4. “Request for Additional Sampling of Air, Soil, and Biota/Vegetation and Analysis for PCB Congeners.” Letter, Cheryl Nelson, U.S. EPA Region 9, to Paul Turek, Chemical Waste Management, Inc. December 2, 2008.
5. “Draft Dioxin-Like Polychlorinated Biphenyl (PCB) Congeners Study Workplan.” Wenck Associates, Inc. January 2009.
6. “EPA Region IX Comments on CWM’s Draft Dioxin-like Polychlorinated Biphenyl (PCB) Congener Study Workplan.” Email, Kevin Wong, U.S. EPA Region 9, to Paul Turek Chemical Waste Management, Inc. February 12, 2009. With attachment: “Draft Dioxin-Like Polychlorinated Biphenyl (PCB) Congeners Study Workplan Technical Review.” Memorandum, Kevin Wong, U.S. EPA Region 9, to Chemical Waste Management – Kettleman Hills Hazardous Waste Landfill Facility Technical Support Team, U.S. EPA Region 9. February 2009.
7. “Chemical Waste Management, Inc. Kettleman Hills Facility, Draft Dioxin-Like PCB Congeners Study Workplan, Revision 1.” Letter, Paul Turek, Chemical Waste Management, Inc., to Cheryl Nelson, U.S. EPA Region 9. March 3, 2009. With Enclosure: “Draft Dioxin-Like Polychlorinated Biphenyl (PCB) Congeners Study Workplan Technical Review.” Memorandum, Kevin Wong, U.S. EPA Region 9, to Chemical Waste Management – Kettleman Hills Hazardous Waste Landfill Facility Technical Support Team, U.S. EPA Region 9. No date. With Chemical Waste Management, Inc.’s incorporated responses to U.S. EPA’s comments. And:
  - a. “Draft Dioxin-Like Polychlorinated Biphenyl (PCB) Congeners Study Workplan (Revision 1).” Wenck Associates, Inc. January 2009 (Rev. March 2009).
8. “EPA Review Comments – CWM-KHF Revised PCB Congener Workplan.” Email, Kevin Wong, U.S. EPA Region 9, to Paul Turek Chemical Waste Management, Inc. March 12, 2009. With attachment: “Technical Review: “Draft Dioxin-Like Polychlorinated Biphenyl (PCB) Congeners Study Work Plan, Revision 1, Revised March 2009 – Chemical Waste Management.” Memorandum, Kevin Wong, U.S. EPA Region 9, to Chemical Waste Management – Kettleman Hills Hazardous Waste Landfill Facility Technical Support Team, U.S. EPA Region 9. March 2009.
9. “Chemical Waste Management, Inc. Kettleman Hills Facility, Draft Dioxin-Like PCB Congeners Study Workplan, Revision 2.” Letter, Paul Turek, Chemical Waste Management, Inc., to Cheryl Nelson, U.S. EPA Region 9. March 20, 2009. With Enclosure: “Chemical Waste Management’s Responses to EPA’s Memorandum: Technical Review: “Draft Dioxin-Like Polychlorinated Biphenyl (PCB) Congeners Study Work Plan, Revision 1, Revised March 2009 – Chemical Waste Management.” Chemical Waste Management, Inc. March 2009. (Responses incorporated into U.S. EPA’s memorandum).
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19. “Analytical Results – Air Samples June 2009.” TestAmerica. July 31, 2009.
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23. “Analytical Results – Air Samples September 2009.” TestAmerica. November 11, 2009.
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25. “Analytical Results – Air Samples October 2009.” TestAmerica. November 27, 2009.
26. “Split Sampling Field Report – Chemical Waste Management, Inc. Kettleman Hills, California.” U.S. EPA Region 9. November 30, 2009.
27. “Informe de Campo Sobre Muestras Separadas, – Chemical Waste Management, Inc. Kettleman Hills, California.” U.S. EPA Region 9. November 30, 2009.
28. “Kettleman Hills PCB Risk Assessment Comments .” Email, John Beach, U.S. EPA Region 9, to Bill Brown, Wenck Associates, Inc. December 8, 2009.
29. “KHF PCB Risk Assessment Comments .” Emails, John Beach, U.S. EPA Region 9, to/from Steve Dillard, AECOM. December 11-14, 2009.
30. “KHF PCB Risk Assessment Comments – % lipid.” Emails, John Beach, U.S. EPA Region 9, to/from Steve Dillard, AECOM. December 14, 2009.



31. “PCB Congener Study Preliminary Results Discussion, December 16, 2009.” Agenda and attendance sheets. U.S. EPA Region 9. December 16, 2009. [REDACTED for posting on regulations.gov]
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34. “Air Dispersion Model (December 16, 2009 Action Item).” Email, Edwin Poalinelli, U.S. EPA Region 9, to/from Bill Brown, Wenck Associates, Inc. December 18, 2009 – January 6, 2010.
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39. “Responses to Comments USEPA Review of Ecological Components of Section 5.0 Risk Assessment Comment Letter Dated November 25, 2009.” Wenck Associates, Inc. February 2, 2010.
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42. “Review of Human Health Components of Section 5.0 Risk Assessment Submitted by Chemical Waste Management on October 27, 2009 – Toxic Substances Control Act (“TSCA”) B-18 Application Kettleman Hills Facility.” Letter, Cheryl Nelson, U.S. EPA Region 9, to Bob Henry, Chemical Waste Management, Inc. February 5, 2010. With enclosure: “Chemical Waste Management – Kettleman Hills Facility draft Polychlorinated Biphenyls Congener Human Health & Ecological Risk Assessment.” Memorandum, Patrick Wilson, U.S. EPA Region 9, to Edwin Poalinelli, U.S. EPA Region 9. January 29, 2010.
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45. “Two Other EPA-IX Responses Due by 03/10/10.” Emails, Edwin Poalinelli, U.S. EPA Region 9, to/from Katherine Cole, Waste Management, Inc. February 23-24, 2010.
46. “Chemical Waste Management, Inc. – Kettleman Hills Facility Request for Additional 30 Days for Response.” Letter, Paul Turek, Chemical Waste Management, Inc. to Cheryl Nelson, U.S. EPA Region 9. February 25, 2010.
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  - b. “Chemical Waste Management, Inc. – Kettleman Hills Facility, Responses to Comments, USEPA Review of ecological components (Section 5.1, 5.2., and 5.4) of the revised risk assessment submitted by Chemical Waste Management on January 19, 2010 – Toxic Substance Control Act (“TSCA”) B-18 Application Kettleman Hills Facility. Comment Memorandum dated February 5, 2010.” Wenck Associates, March 12, 2010.
  - c. “Chemical Waste Management, Inc. – Kettleman Hills Facility Revised Ecological Risk Assessment for the PCB Congener Study, Previously submitted January 19, 2010.” Letter, William Brown, Wenck Associates, Inc. to Edwin Poalinelli, U.S. EPA Region 9. March 12, 2010.



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50. “ERA Questions.” Emails, Edwin Poalinelli, U.S. EPA Region 9, to/from Bill L. Brown, Wenck Associates and Katherine Cole, Waste Management, Inc. March 16 – 18, 2010.
51. “Organic Data Quality Review Report, PCB Congeners by EA 1668A.” Diane Short & Associates, Inc. March 18, 2010.
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53. “ERA- Kettleman Hills Facility Action Items and Final Edits.” Emails, Edwin Poalinelli, U.S. EPA Region 9, to/from Katherine Cole, Waste Management, Inc. March 23-25, 2010.
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55. “Kettleman Hills Facility PCB Congeners Study – Human Health Risk Assessment.” Email, Susan Provenzano, AECOM, to Edwin Poalinelli, U.S. EPA Region 9. April 6, 2010.
56. “AECOM SendFiles Notification: Susan Provenzano has sent you files.” Email, Susan Provenzano, AECOM, to Edwin Poalinelli, U.S. EPA Region 9. April 6, 2010 (4:00 pm)
57. “Draft Human Health Risk Assessment Chapter 5, Tables 5.2.1. – 5.3-32, Figure 6.” Wenck Associates, Inc. April 6, 2010.
58. “AECOM SendFiles Notification: Susan Provenzano has sent you files.” Email, Susan Provenzano, AECOM, to Edwin Poalinelli, U.S. EPA Region 9. April 6, 2010 (4:31 pm).
59. “Draft Human Health Risk Assessment Tables L5.3.1. – 32 and M5.3.1 – 32.” Wenck Associates, Inc. April 6, 2010.
60. “AECOM SendFiles Notification: Susan Provenzano has sent you files.” Email, Susan Provenzano, AECOM, to Edwin Poalinelli, U.S. EPA Region 9. April 6, 2010 (4:42 pm).
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  64. “WM KHF HHRA Response to Comments.” Emails, Bill L. Brown, Wenck Associates, to/from Edwin Poalinelli, U.S. EPA Region 9. April 7 and 8, 2010. With attachment: “Chemical Waste Management, Inc. – Kettleman Hills Facility, Responses to Comments, USEPA Review of Human Health Components of Section 5.0, Risk Assessment Submitted by Chemical Waste Management on October 27, 2009 – Toxic Substance Control Act (“TSCA”) B-18 Application Kettleman Hills Facility. Comment Memorandum dated February 5, 2010.” Wenck Associates, April 7, 2010.
  65. “WM KHF HHRA Response to Comments.” Emails, Bill Brown, Wenck Associates, Inc. to/from Edwin Poalinelli, U.S. EPA Region 9. April 7-8, 2010.
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  67. “WM KHF Working Draft of PCB Congener Study Report” Email, Bill Brown, Wenck Associates, Inc. to Edwin Poalinelli, U.S. EPA Region 9. April 9, 2010. With attachment: “Draft Dioxin-Like Polychlorinated Biphenyl (PCB) Congeners Study Report.” Wenck Associates, Inc. April 2010.
  68. “Congener Study Update?” Emails. Edwin Poalinelli, U.S. EPA Region 9, to/from Paul Turek, Chemical Waste Management, Inc. May 7 and 11, 2010.
  69. “Congener Study Update?” Emails, Paul Turek, Chemical Waste Management, Inc. to/from Cheryl Nelson, U.S. EPA Region 9. May 20 and May 26, 2010.
  70. “Congeners vs non-dioxin-like PCBs in the Kettleman ecological risk assessment.” Email, John Beach, U.S. EPA to Edwin Poalinelli, U.S. EPA Region 9. August 19, 2010.
  71. “EPA Comments on the Draft Congener Study Report.” Email, Edwin Poalinelli, U.S. EPA Region 9, to Bob Henry, Chemical Waste Management, Inc. August 19, 2010. With attachment:
    - a. “U.S. EPA Review of the Draft Congener Study Report Submitted by Chemical Waste Management on April 7, 2010 – Toxic Substances Control Act (“TSCA”) B-18 Application Kettleman Hills Facility (CAT 000646117).” Letter, Cheryl Nelson, U.S. EPA Region 9, to Bob Henry, Chemical Waste Management, Inc. August 19, 2010. With enclosure: “Environmental Protection (“EPA”) Review of the Draft Congener Study Report Submitted by Chemical Waste Management on April 7, 2010 – Toxic Substances Control Act (“TSCA”) B-18 Application Kettleman Hills Facility (“KHF”)” August 19, 2010.
  72. “EPA Comments on Draft Congener Study Report.” Emails, Edwin Poalinelli. U.S. EPA Region 9, to/from Paul Turek, Chemical Waste Management, Inc. August 24, 2010.





73. “EPA Comments on the Draft Congener Study Report.” Emails, Paul Turek, Chemical Waste Management, Inc. to/from Chip Poalinelli, U.S. EPA Region 9. August 30, 2010.
74. “Proposed Approach for Addressing Comment 17 of EPA Region 9 Comments (19 August 2010) on the Draft PCB Congener Study Report (7 April 2010) for the Kettleman Hills Facility.” Wenck Associates, Inc. September 2010.
75. “Follow-up to the 9-14-10 CWM/EPA Draft Congener Study Conference Call (Discussion on Comment #17[b])” Email, Edwin Poalinelli. U.S. EPA Region 9, to Bob Henry, Chemical Waste Management, Inc. September 16, 2010.
76. “Follow-up to the 9-14-10 CWM/EPA Draft Congener Study Conference Call (Discussion on Comment #17[b])” Email, Paul Turek, Chemical Waste Management, Inc. to Edwin Poalinelli. U.S. EPA Region 9. September 20, 2010.
77. “Draft-Final Dioxin-Like Polychlorinated Biphenyl (PCB) Congeners Study Report.” Wenck Associates, Inc. October 2010.
78. “[DRAFT] Executive Summary -Final Dioxin-Like Polychlorinated Biphenyl (PCB) Congeners Study Report.” Wenck Associates, Inc. October 2010.
79. “Chemical Waste Management, Inc. – Kettleman Hills Facility, Draft Congeners Study Report – Response to Comments.” Letter, Paul Turek, Chemical Waste Management, Inc. to Cheryl Nelson, U.S. EPA Region 9. October 22, 2010. With Enclosure: Chemical Waste Management, Inc. – Kettleman Hills Facility Response to Comments, Environmental Protection Agency (“EPA”) Review of the Draft Congeners Study Report Submitted by Chemical Waste Management on April 7, 2010 – Toxic Substance Control Act (“TSCA”) B-18 Application Kettleman Hills Facility (“KH”) August 19, 2010.” October 22, 2010.
80. “FW: AECOM SendFiles Notification: Tony Collins has sent you files.” Email, Paul Turek, Chemical Waste Management, Inc. to , Edwin Poalinelli, U.S. EPA Region 9. October 28, 2010. With Attached Tables (in folder titled 2010-10-28 Email – tables).
81. “Minor Comments on the Draft Final Congener Report.” Email, Edwin Poalinelli. U.S. EPA Region 9, to Paul Turek, Chemical Waste Management, Inc. November 1, 2010.
82. “Minor Comments on the Draft Final Congener Report.” Emails, Edwin Poalinelli. U.S. EPA Region 9, to/from Paul Turek, Chemical Waste Management, Inc. November 1 -3, 2010 (12:58 pm).
83. “Two Additional Comments Regarding the ERA Sections.” Emails, Edwin Poalinelli. U.S. EPA Region 9, to Paul Turek, Chemical Waste Management, Inc. November 2, 2010.
84. “Minor Comments on the Draft Final Congener Report.” Emails, Paul Turek, Chemical Waste Management, Inc. to/from Edwin Poalinelli. U.S. EPA Region 9. November 3, 2010 (1:38 pm).
85. “Minor Comments on the Draft Final Congener Report.” Emails, Edwin Poalinelli. U.S. EPA Region 9, to/from Paul Turek, Chemical Waste Management, Inc. November 3, 2010 (3:10 pm).



86. “Minor Comments on the Draft Final Congener Report.” Emails, Edwin Poalinelli. U.S. EPA Region 9, to/from Paul Turek, Chemical Waste Management, Inc. November 3, 2010 (4:13 pm).
87. “Two Additional Comments Regarding the ERA Sections.” Emails, Edwin Poalinelli. U.S. EPA Region 9, to/from Paul Turek, Chemical Waste Management, Inc. November 3, 2010.
88. “[DRAFT] Executive Summary -Final Dioxin-Like Polychlorinated Biphenyl (PCB) Congeners Study Report.” Wenck Associates, Inc. November 2010.
89. “Congener Study Report Executive Summary.” Email, Edwin Poalinelli. U.S. EPA Region 9, to Paul Turek, Chemical Waste Management, Inc. November 4, 2010. (8:17 am)
90. “Congener Study Report Comments and Proposed Schedule.” Email, Edwin Poalinelli. U.S. EPA Region 9, to Paul Turek, Chemical Waste Management, Inc. November 4, 2010 (8:24 am).
91. “Congener Study Report Comments and Proposed Schedule.” Email, Edwin Poalinelli. U.S. EPA Region 9, to/from Paul Turek, Chemical Waste Management, Inc. November 4, 2010 (9:05 am).
92. “Minor Comments on the Draft Final Congener Report.” Emails, Edwin Poalinelli. U.S. EPA Region 9, to/from Paul Turek, Chemical Waste Management, Inc. November 4, 2010 (10:47 am).
93. “Congener Study Report Comments and Proposed Schedule.” Emails, Edwin Poalinelli. U.S. EPA Region 9, to/from Paul Turek, Chemical Waste Management, Inc. November 4, 2010 (3:00 pm).
94. “Congener Study Report Comments and Proposed Schedule.” Emails, Edwin Poalinelli. U.S. EPA Region 9, to/from Paul Turek, Chemical Waste Management, Inc. November 8, 2010.
95. “Final Dioxin-Like Polychlorinated Biphenyl (PCB) Congeners Study Report.” Wenck Associates, Inc. November 2010.
  - a. Appendices A – O (except for Appendices D and G) -- “Dispersion Modeling Report Associated with the PCB Congener Study.” Wenck Associates, Inc. October 2009.
  - b. Appendix D – Field Notes/Data Sheets/Photo Log for Soil and Vegetation Sampling (No date).
  - c. Appendix G – Laboratory Analytical Data.
96. “Resumen Ejecutivo, Informe Final: Estudio de Congéneres de Bifenilos Policlorados (PCB) de Tipo Dioxina.” Wenck Associations, Inc. November 2010.
97. “Questions and EPA Responses Received from Greenaction/Center on Race, Poverty, and the Environment Regarding CWM PCB Congener Study Report.” U.S. EPA Region 9. December 2010.



98. “EPA Information Sheet – Results of the Polychlorinated Biphenyls (PCB) Congener Study Chemical Waste Management Kettleman Hills Facility.” U.S. EPA Region 9. January 2011. (English and Spanish)
99. “CWM Kettleman Hills Polychlorinated Biphenyls (PCB) Congener Study, EPA’s Quality Assurance/Oversight Efforts.” Memorandum, EPA’s Kettleman PCB Congener Study Team to Cheryl Nelson, U.S. EPA Region 9. January 3, 2011.

## **B. 2010 ENVIRONMENTAL ASSESSMENT**

1. “Comments on draft Kettleman Sampling and Analysis Plan.” Email, Katherine Baylor, U.S. EPA Region 9, to Katherine Baylor, U.S. EPA Region 9. March 29, 2010.
2. “Benzene in Water Supply Wells, Kettleman City, Kings County.” Memorandum, Greg Issinghoff, California Regional Water Quality Control Board, Central Valley Region to Russell W. Walls and others, California Regional Water Quality Control Board, Central Valley Region. October 13, 2010.
3. “Appendix DTSC Report – Kettleman City Site Investigation Report Sampling Results Addendum.” ACS Associates. October 25, 2010.
4. “Investigation of Birth Defects and Community Exposures in Kettleman City, CA. Public Review Draft” California Environmental Protection Agency and California Department of Public Health. November 2010.
5. “Investigation of Birth Defects and Community Exposures in Kettleman City, CA.” California Environmental Protection Agency and California Department of Public Health. December 2010 (revised February 24, 2011).
6. “Investigación de defectos de nacimiento y exposiciones ambientales en la comunidad de Kettleman City, CA.” California Environmental Protection Agency and California Department of Public Health. diciembre del 2010 (24 de Febrero de 2011).
7. “Report to the Office of Environmental Health Hazard Assessment, Kettleman City Air Quality Assessment.” California Air Resources Board, December 2010.
8. “Kettleman City Community Exposure Assessment, Evaluation of Pesticides in Air.” Department of Pesticide Regulation. December 2010.
9. “Response to Public Comments on the Investigation of Birth Defects and Community Exposures in Kettleman City, CA.” California Environmental Protection Agency and California Department of Public Health. February 1, 2011.
10. “Respuesta a comentarios publicos sobre la Investigación de defectos de nacimiento y exposiciones ambientales en la comunidad de Kettleman City, CA.” California Environmental Protection Agency and California Department of Public Health. February 2, 2011.
11. “Question about asthma data in Kettleman City Report.” Email, Meredith Milet, California Department of Public Health, to Debbie Lowe, U.S. EPA Region 9. February 17, 2011.



12. “Errata to Investigation of Birth Defects and Community Exposures in Kettleman City, CA.” California Environmental Protection Agency and California Department of Public Health. February 24, 2011.
13. “Erratum to Investigation of Birth Defects and Community Exposures in Kettleman City, CA.” California Environmental Protection Agency and California Department of Public Health. February 24, 2011.
14. “California Department of Public Health and California Environmental Protection Agency Follow-Up to Kettleman City Investigation: An Update.” California Department of Public Health and California Environmental Protection Agency. October 2011.
15. “Departamento de Salud Publica de California Agencia de Proteccion Ambiental de California Seguimiento a la Investigación en Kettleman City: Actualización.” California Department of Public Health and California Environmental Protection Agency. October 2011.
16. “Birth Defects in Kettleman City and Surrounding Areas 2009-2011 Update.” California Department of Public Health, California Birth Defect Monitoring Program. June 2012.

**C. HEALTH RISK ASSESSMENTS (Department of Toxic Substances Control Requirement)**

1. “Comments on the Draft 2011 Health Risk Assessment, Chemical Waste Management, Inc. Kettleman Hills Facility, 35251 Old Skyline Road, Kettleman City, Kings County, California 93239, Environmental Protection Agency Identification Number CAT 000646117.” Letter, Wayne Lorentzen, Department of Toxic Substances Control to Paul Turek, Chemical Waste Management, Inc. August 4, 2011. With Enclosure: “Chemical Waste Management, Inc. Kettleman Hills Facility, Kings County, California CAT 000646117 Draft 2011 Health Risk Assessment.” Memorandum, Brian Endlich, Department of Toxic Substances Control to Wayne Lorentzen, Department of Toxic Substances Control. July 27, 2011.
2. “Final 2011 Health Risk Assessment.” Wenck Associates, Inc. September 2011.
3. “Final 2011 Health Risk Assessment.” Wenck Associates, Inc. November 2011.
4. “Final Annual Screening Level Health Risk Assessment October 2010 – September 2011, Chemical Waste Management, Inc. Kettleman Hills Facility (KHF)” Wenck Associates, Inc. July 2012.
5. “Annual Screening Level Health Risk Assessment October 2011 – September 2012, Chemical Waste Management, Inc. Kettleman Hills Facility (KHF)” Wenck Associates, Inc. March 2013.
6. “Annual Screening Level Health Risk Assessment October 2012 – September 2014, Chemical Waste Management, Inc. Kettleman Hills Facility (KHF)” Wenck Associates, Inc. March 2014.
7. “Annual Screening Level Health Risk Assessment October 2013 – September 2014, Chemical Waste Management, Inc. Kettleman Hills Facility (KHF)” Wenck Associates, Inc. March 2015.



8. “Annual Screening Level Health Risk Assessment October 2014 – September 2015, Chemical Waste Management, Inc. Kettleman Hills Facility (KHF)” Wenck Associates, Inc. March 2016.
9. “Annual Screening Level Health Risk Assessment October 2015 – September 2016, Chemical Waste Management, Inc. Kettleman Hills Facility (KHF)” Wenck Associates, Inc. March 2017.
10. “Chemical Waste Management, Inc. – Kettleman Hills Facility Ambient Air Monitoring Program – Annual Screening Level, Health Risk Assessment.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Ryan Batty, Department of Toxic Substances Control. March 27, 2018. With enclosure “Annual Screening Level Health Risk Assessment October 2016 – September 2017, Chemical Waste Management, Inc. Kettleman Hills Facility (KHF)” Wenck Associates, Inc. March 2018.
11. “Chemical Waste Management, Inc. – Kettleman Hills Facility Ambient Air Monitoring Program – Annual Screening Level, Health Risk Assessment.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Ryan Batty, Department of Toxic Substances Control. March 27, 2019. With enclosure “Annual Screening Level Health Risk Assessment October 2017 – September 2018, Chemical Waste Management, Inc. Kettleman Hills Facility (KHF)” Wenck Associates, Inc. March 2019.

#### **D. CALIFORNIA ENVIRONMENTAL QUALITY ACT DOCUMENTS**

1. “Traffic Impact Study, Chemical Waste Management, Inc. Kettleman Hills Facility.” TPG Consulting. February 2009.
2. “Kettleman Hills Facility B-18/B-20 Landfill (Chemical Waste Management, Inc.); Revised Analysis: Hazardous Waste Truck Trips as Percentage of Total Truck Trips on I-5 at State Route 41 and on State Route 41 from Quail Avenue to I-5.” Revised Memorandum, Robert Mason, Ch2M HILL to Bob Henry, Chemical Waste Management, Inc. March 1, 2012.
3. “Environmental Document Analysis – Hazardous Waste Facility Permit Renewal, Chemical Waste Management, Inc. Kettleman Hills Facility.” Department of Toxic Substances Control. May 2019.

#### **E. BIOLOGICAL ASSESSMENT**

1. “Mitigation and Monitoring Plan for the Chemical Waste Management, Inc. Kettleman Hills Facility in King County, California, Revision 6.” Chemical Waste Management, April 1, 2008.
2. “Biological Assessment.” Email, Paul Turek, Chemical Waste Management, Inc. to Edwin Poalinelli, U.S. EPA Region 9. January 19, 2010. With attachment: “Map Perimeter Fence Relocation, Kettleman Hills, California.”
3. “Chemical Waste Management, Inc. – Kettleman Hills Facility Section 7 Biological Assessment – March 2010 Revision.” Email, Paul Turek, Chemical Waste Management, Inc. to Cheryl Nelson, U.S. EPA Region 9. March 12, 2010. With enclosure:



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2. “Muestro Residencial en Kettleman City.” Pesticides Factsheet Spanish, Agencia de Proteccion Ambiental de los Estados Unidos. Julio 2011.
3. “Kettleman City Residential Sampling, Kettleman City Indoor Pesticide Sampling.” U.S. EPA Region 9. July 2011.
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5. “Mujer Saludable es Familia Saludable (A Healthy Woman is a Healthy Family) Prevention of Pesticide Exposure Project.” Final Report. Vision y Compromiso. December 8, 2011.

**X. OTHER DOCUMENTS****A. PREVIOUS APPROVALS**

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8. “TSCA Approval Request for Landfill B-18 Phase II, Chemical Waste Management, Inc.’ Kettleman Hills Facility.” Letter, Catherine R. Pool, Chemical Waste Management, Inc. to Vince Mancus, U.S. EPA Region 9. December 27, 1993.



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#### **B. FINANCIAL ASSURANCE AND LIABILITY INSURANCE**

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2. “Chemical Waste Management, Inc. – Kettleman Hills Facility 22 CCR Financial Assurance for Closure and Post-Closure Costs.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Julie Mullins, Department of Toxic Substances Control. January 17, 2019. With enclosures: “Rider to Performance Bond SUR0047833” Argonaut Insurance Company. Effective January 1, 2019. And “Schedule A to Closure/Post Closure Trust Agreement D068134NS.” U.S. Bank National Association. Revised January 9, 2019.
3. “Chemical Waste Management, Inc. – Kettleman Hills Facility 22 CCR Sudden and Non-sudden Accidental Liability Coverage.” Letter, Reyna Verdin, Chemical Waste Management, Inc. to Permitting Branch, Department of Toxic Substances Control. June 27, 2019. With enclosure: “Liability Certificate of Insurance” Great American E&S Insurance Company. Effective July 1, 2019.



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**C. TECHNICAL ASSISTANCE SERVICES FOR COMMUNITY REPORTS TO KETTLEMAN CITY RESIDENTS**

1. “Memo #1 Some observations and suggestions regarding California Environmental Protection Agency’s Proposed Exposure Assessment for Kettleman City.” Memorandum, Daniel Wartenberg, Technical Assistance Services for Communities Program to Kettleman City Residents. April 6, 2010.
2. “Memo No. 1. Algunas observaciones y sugerencias sobre la propuesta de evaluación de la exposición a sustancias contaminantes en la Ciudad de Kettleman, de la Agencia de Protección Ambiental de California.” Memorandum, Daniel Wartenberg, Programa de Servicios de Asistencia Técnica a Comunidades (TASC) para Residentes de la Ciudad de Kettleman. 6 de abril de 2010.
3. “Memo #2 Some Consideration of the Reported Health Status of Residents of Kettleman City And suggestions for Next Activities.” Memorandum, Daniel Wartenberg, Technical Assistance Services for Communities Program to Kettleman City Residents. April 14, 2010.
4. “Memo #1 Brief.” Memorandum, Daniel Wartenberg, Technical Assistance Services for Communities Program to Kettleman City Residents. June 16, 2010.
5. “Memorandum Breve #1.” Daniel Wartenberg, Programa de Servicios de Asistencia Técnica a Comunidades (TASC) para Residentes de la Ciudad de Kettleman. 16 de junio de 2010.
6. “Memo #2 Brief.” Memorandum, Daniel Wartenberg, Technical Assistance Services for Communities Program to Kettleman City Residents. June 16, 2010.
7. “Memorandum Breve #2.” Daniel Wartenberg, Programa de Servicios de Asistencia Técnica a Comunidades (TASC) para Residentes de la Ciudad de Kettleman. 16 de junio de 2010.
8. “Memo #3 Brief: What can help Kettleman City residents NOW?.” Memorandum, Daniel Wartenberg, Technical Assistance Services for Communities Program to Kettleman City Residents. October 4, 2010.
9. “BREVIARIO del memorándum No. 3 ¿Qué puede ayudar a los residentes de la ciudad de Kettleman AHORA?” Daniel Wartenberg, Programa de Servicios de Asistencia Técnica a Comunidades (TASC) para Residentes de la Ciudad de Kettleman. 4 de octubre de 2010.
10. “Memo #3: What can help Kettleman City residents NOW?.” Memorandum, Daniel Wartenberg, Technical Assistance Services for Communities Program to Kettleman City Residents. October 4, 2010.
11. “Memorandum No. 3 ¿Qué puede ayudar a los residentes de la ciudad de Kettleman AHORA?” Daniel Wartenberg, Programa de Servicios de Asistencia Técnica a Comunidades (TASC) para Residentes de la Ciudad de Kettleman. 4 de octubre de 2010.
12. “Memo #4: Comments and Recommendations in Response to the California Department of Public Health (CalDPH) and California Environmental Protection



- Agency's (CalEPA) INVESTIGATION OF BIRTH DEFECTS AND COMMUNITY EXPOSURES IN KETTLEMAN CITY, CA PUBLIC REVIEW DRAFT released November 22, 2010." Memorandum, Daniel Wartenberg, Technical Assistance Services for Communities Program to Kettleman City Residents. December 1, 2010.
13. "Memorandum #4: Los comentarios y las Recomendaciones en Respuesta al Departamento de California de Sanitaria (CalDPH) y la Organización de Protección del Medio Ambiente de California (CalEPA) INVESTIGACION DE DEFECTOS de NACIMIENTO Y EXPOSICIONES de COMUNIDAD EN la CIUDAD de KETTLEMAN, CA GIRO que PUBLICO de REVISION soltó el 22 de noviembre de, CA PUBLIC REVIEW DRAFT released November 22, 2010." Daniel Wartenberg, Programa de Servicios de Asistencia Técnica a Comunidades (TASC) para Residentes de la Ciudad de Kettleman. 1 de diciembre de 2010.
  14. "Memo #4 Brief: Comments and Recommendations in Response to the California Department of Public Health (CalDPH) and California Environmental Protection Agency's (CalEPA) INVESTIGATION OF BIRTH DEFECTS AND COMMUNITY EXPOSURES IN KETTLEMAN CITY, CA PUBLIC REVIEW DRAFT released November 22, 2010." Memorandum, Daniel Wartenberg, Technical Assistance Services for Communities Program to Kettleman City Residents. December 27, 2010.
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  17. "Memorandum #5: Comentarios y las Recomendaciones en Respuesta al Departamento de Salud Pública del Estado de California (California Department of Public Health o Cal DPH) y de la Agencia de Protección Ambiental del Estado de California (California Environmental Protection Agency o Cal EPA) INVESTIGACION DE DEFECTOS de NACIMIENTO Y EXPOSICIONES de COMUNIDAD EN la CIUDAD de KETTLEMAN, CA PROYECTO DE REVISIÓN PÚBLICA publicado 22 de noviembre 2010 (Segunda Parte)." Daniel Wartenberg, Programa de Servicios de Asistencia Técnica a Comunidades (TASC) para Residentes de la Ciudad de Kettleman. 20 de noviembre de 2011.
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(CDPH's) Response to Community Concerns." Memorandum, Daniel Wartenberg, Technical Assistance Services for Communities Program to Kettleman City Residents. August 20, 2012.

19. "Memorandum #6: Modelos de incidencia de los defectos congénitos y cáncer en la ciudad de Kettleman y el Valle Central de California, incluyendo la respuesta del Departamento de Salud Pública de California (CalDPH, por sus siglas en inglés) a las preocupaciones de la Comunidad." Daniel Wartenberg, Programa de Servicios de Asistencia Técnica a Comunidades (TASC) para Residentes de la Ciudad de Kettleman. 20 de Agosto de 2012.

#### **D. MISCELLANEOUS DOCUMENTS**

1. 40 Code of Federal Regulations Part 136 – Guidelines Establishing Test Procedures for the Analysis of Pollutants (1982 ed.).
2. "Confirmation to Include Public Notice and Comment Prior to Issuance of PCB Commercial Storage or Fixed-site Disposal Approvals." Memorandum, Katherine Taylor, U.S. EPA Region 9, to Lynn R. Goldman, MD, Assistant Administrator, U.S. EPA. May 2, 1995. With enclosure "Region IX Public Notice Procedure for PCB Permits." U.S. EPA Region 9, toxics Section. May 2, 1995.
3. "2002 Modification of PCB Disposal Approval for RMU-1 to add Cell 11/13 CWM Chemical Services, LLC, EPA I.D. No. NYD049836679." Letter, Jane Kenny, U.S. EPA Region 2 to Dennis Vacco, CWM Chemical Services. December 4, 2002.
4. "Approval for Commercial Storage, Processing, and Landfill Disposal of Polychlorinated Biphenyls (PCBs) and PCB Items." Letter, Beverly Bannister, U.S. EPA Region 4 to Roger Henson, Chemical Waste Management, Inc. April 16, 2007.
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6. "Responses to Mr Angel Concerning CWM Kettleman Hills, March 14, 2016." Email, Barbara Gross to Bradley Angel, Greenaction and Maricela Mares-Alatorre, El Pueblo. March 30, 2016.
7. "Agenda." Email, Bob Henry, Waste Management to Frances Wicher, U.S. EPA Region 9. July 20, 2016.
8. "Region 9 Land Division Trip Report for TSCA approval/RCRA permit Chemical Waste Management Kettleman Hills Facility." U.S. EPA Region 9. May 18, 2017.

