

Administrative record documents for the
Toxic Substances Control Act (TSCA)
Draft Coordinated Approval issued under 40 CFR 761.77 from the
U.S. Environmental Protection Agency (EPA) for
Polychlorinated Biphenyl (PCB) waste activities at the
Chemical Waste Management, Inc. (CWM) – Kettleman Hills Facility

Table of Contents

Volume I – Summary, approval request, approval, underlying state permit,
and environmental justice assessment

1. Fact sheet
2. Draft approval
3. Justification for draft approval
4. Response to comments on draft approval
5. Final approval decision
6. Justification for final approval decision
7. Draft environmental justice assessment
8. Response to comments on draft environmental justice assessment
9. Final environmental justice assessment
10. TSCA approval from EPA for landfill units B-16 and B-19 (February 22, 1988)
11. TSCA approval from EPA for landfill units B-14, B-16, B-19 and ancillary commercial storage activities (December 3, 1990)
12. TSCA approval from EPA for landfill unit B-18 (May 19, 1992)
13. CWM request for renewal of TSCA approval for landfill unit B-18 (April 1, 1997)
14. CWM request for renewal of TSCA approval for landfill units B-14, B-16, and B-19 and ancillary commercial storage activities (July 1, 1997)
15. CWM request for TSCA coordinated approval (October 20, 2003)
16. State of California, Department of Toxic Substances Control, Hazardous waste facility permit and operation plan, Chemical Waste Management, Inc. – Kettleman Hills Facility, Permit number: 02-SAC-03, Facility EPA ID number: CAT000646117 (June 16, 2003)
17. Copies of waste-related permits (March 28, 2005)
18. Updated Chemical Waste Management, Inc. – Kettleman Hills Facility Operation Plan (December 8, 2003)

Volume II – Operation plans

1. Waste analysis plan (September 3, 1998)
2. PCB tracking user guide (July 1992)
3. PCB flushing/storage unit operation plan (February 4, 1994)
4. Spill prevention control and countermeasure plan (September 2001)
5. Contingency plan (August 19, 1998)
6. EPA letter requesting US Fish and Wildlife Service concurrence on action (September 5, 2002)
7. US Fish and Wildlife Service response indicating action is not likely to adversely affect endangered species (November 15, 2002)
8. Mitigation and monitoring plan (Revised April 26, 1991)
9. Additional mitigation documents

Volume III – Operation and closure of landfill B-18

1. Construction specifications and quality assurance plan, Landfill B-18 phases 1 and II and final closure (July 31, 1990)
2. Test fill and infiltrometer test results, Landfill B-18 phases 1 and II and final closure (January 23, 1992)

Volume IV – Information request letters

1. EPA information request letter (June 4, 1999) and CWM response letter #1 (July 7, 1999) – financial assurance, personnel, landfill activities, storage activities, remedial work orders, recordkeeping, notice
2. EPA information request letter (September 16, 1999) and CWM response letter #2 (October 11, 1999) – waste analysis, leachate and groundwater monitoring, landfill B-18 operation plan, landfill B-16 closure plan, worker training
3. EPA information request letter (December 16, 1999) and CWM response letter #3 (January 10, 2000) – air monitoring, remedial work orders, groundwater, tracking PCB waste
4. Letter #4 – Sought updated documents; Retracted when additional options to implement changes identified
5. EPA information request letter (May 19, 2000) and CWM response letter #5 (June 8, 2000) – tracking PCB waste
6. EPA information request email (November 27, 2000) and CWM response letter #6 (December 4, 2000) – closure plans, PCB storage tank
7. EPA information request letter (April 4, 2001) and CWM response letter #7 (May 11, 2001) – certification, ownership, capacity of landfills B-16 and B-18
8. EPA information request letter (December 5, 2002) and CWM response letter #8 (January 21, 2003) – closure and closure cost estimates
9. CWM response letter #9 (April 11, 2003) – management resumes, landfill B-16 construction certification report, closure cost estimates, financial assurance

Volume V – Leachate and Groundwater monitoring

1. Revised groundwater monitoring and reporting program (March 20, 2001)
2. Site-specific groundwater monitoring plan (May 2001)
3. Supplemental details for feasibility study to test the existing leachate collection and removal systems and request for EPA approval (May 4, 2001)
4. EPA request for additional information about feasibility study to test the existing leachate collection and removal systems (July 5, 2001)
5. CWM response to EPA request for additional information about feasibility study to test the existing leachate collection and removal systems (August 8, 2001)
6. 2005 annual LCRS fluid analysis report (April 12, 2006)

Volume VI – Closure cost estimates, financial assurance, and post-closure inspections

1. Closure and post-closure cost estimates (Revised January 31, 2002)
2. Review of PCB flushing/storage unit closure plan and closure cost estimate (2002)
3. Financial assurance review (February 27, 2003)
4. B-16 closure/post-closure cost estimate (February 24, 2004)
5. Fax of financial assurance as of January 18, 2006
6. Request for financial assurance information (July 12, 2006)
7. 2004 annual post-closure inspection report (September 30, 2004)
8. 2005 annual post-closure inspection report (September 27, 2005)

Volume VII – Public participation & Monthly Monitoring Reports

1. EPA open house regarding PCB permit (December 7, 1999)
2. Freedom Of Information Act request letter #1 from Center on Race, Poverty & the Environment (April 5, 2004)
3. EPA response to April 5, 2004 letter – Part 1 (May 18, 2004)
4. EPA response to April 5, 2004 letter – Part 2 (June 3, 2004)
5. EPA response to Freedom Of Information Act request letter #2 from Center on Race, Poverty & the Environment (September 28, 2004)
6. Monthly monitoring reports for 2005 – 2006

Volume VIII – Inspection reports (also see Volume XI)

1. EPA inspection report for October 14 – 15, 1998
2. EPA inspection report for April 14 – 15, 2004

Volume IX (Binder A & B) – Closed TSCA units, Landfill B-14 & B-16

1. Landfill Unit B-14 post closure care inspection (November 1, 1991)
2. Decommissioning of landfill B-14 sounding wells (January 19, 2006)
3. Closure plan for landfill B-16, Revision 1 (March 1993)
4. Review of landfill B-16 and B-18 closure (November 25, 2002)
5. Landfill B-16 cover slope stability analysis (January 15, 2004)
6. Landfill B-16 LCRS sump (June 1, 2004)
7. Construction quality assurance report on final closure of landfill B-16 (December 2004)
8. Landfill Unit B-16 closure construction certification report (December 15, 2004)
9. Landfill Unit B-16 closure construction certification report – response to comments (March 16, 2005)

Volume X (Binder A & B) – Closed TSCA units, Landfill B-19

1. Construction quality assurance report on landfill B-19 perimeter berm (May 2005)
2. Revisions to the as-built construction and partial closure report for landfill B-19 perimeter berm (August 10, 2005)
3. CIWMB concurrence on construction quality assurance report for landfill B-19 perimeter berm (August 19, 2005)
4. Construction quality assurance report for landfill B-19 perimeter berm (June 2006)
5. Modification #2, Landfill Unit B-19, Closure plan for Class 1 portion, (April 2006)
6. Response to DTSC comments on Modification #2, Landfill Unit B-19, Closure plan for Class 1 portion (May 2, 2006)
7. Supplemental information on landfill B-19 closure (June 2, 2006)

Volume XI – Miscellaneous

1. Final ambient air monitoring plan (February 2006)
2. EPA letter regarding air risk analysis (September 8, 2006)
3. CWM letter removing CBI claim on financial assurance information (August 25, 2006)
4. National Guaranty Insurance Company of Vermont Closure and Post-Closure Insurance Policy No. CPCH03-0001, along with Endorsements 1 through 5.
5. EPA letter to CWM regarding financial assurance (November 15, 2006)
6. EPA letter to clarifying letter of November 15, 2006. (December 18, 2006)
7. EPA HQ letter to Waste Management regarding financial assurance. (October 31, 2006)
8. Follow-up to 1,000 year storm event (February 2006)
9. CWM letter requesting EPA approval of changes in use of final stabilization unit (January 13, 2005)
10. EPA letter responding to January 13, 2005 by seeking additional information (March 8, 2005)
11. 2006 annual post-closure inspection report (September 29, 2006)
12. EPA inspection report for October 25 – 26, 2001
13. Regional Water Quality Control Board resolution (1989) and order (1998)

Volume XII - Comparison between Federal Toxic Substances Control Act (TSCA) regulations and California Hazardous Waste Control Law (HWCL) regulations that apply to facilities in California that store and dispose of PCB waste.