

Chemical Waste Management Bakersfield Proponent Opening Brief on Appeal

This is a listing of 22 tabs included in the brief submitted by Karen J. Nardi of Arnold & Porter LLP on behalf of Chemical Waste Management Inc.

Many of these documents are too large to upload to DTSC's Web site. To receive an electronic copy of these documents, send a request to appeals@dtsc.ca.gov or phone Mike O'Docharty at (916) 324-4754.

Tabs

1. Letter from Christopher Cullison (CWM) to Tony Hashemian (DTSC), June 10, 2004
2. Letter from Tony Hashemian (DTSC) to Christopher Cullison (CWM), January 26, 2004
3. Letter from Barbara Coler (DTSC) to Charles White (CWM), dated March 22, 2004
4. Letter from Wade Cornwall (DTSC) to Christopher Cullison (CWM), April 14, 2004
5. Letter from Scott Ward (DTSC) to Phil Perley (CWM), May 4, 2005
6. Letter from Phil Perley (CWM) to Scott Ward (DTSC), August 31, 2006
7. DTSC Response to Comments, June 19, 2007
8. Letter from Phil Perley (CWM) to Watson Gin (DTSC), July 19, 2007
9. Letter from Scott Ward (DTSC) to Phil Perley (CWM), December 6, 2007
10. CWM Bakersfield Waste-In Report, prepared by Professional Environmental Group, submitted February 7, 2008
11. Letter from Scott Ward (DTSC) to Phil Perley (CWM), March 27, 2008
12. Waste Characterization Report, prepared by AMEC Geomatrix, Inc., November 4, 2008
 - 12A. Appendix A to Waste Characterization Work Plan, February 2008
 - 12B. Appendix B to Waste Characterization Work Plan, February 2008
 - 12C. Waste Characterization Work Plan, February 2008
 - 12D. Appendix A to Waste Characterization Work Plan, February 2008
 - 12E. Appendix b-D to Waste Characterization Work Plan, February 2008

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13. Letter from Phil Perley (CWM) to Dr. Brian Endlich (DTSC), enclosing Draft Human Health Risk Assessment Calculations, February 25, 2009
14. Second Semiannual and Annual 2008 Monitoring Report, prepared by AMEC Geomatrix, Inc., February 26, 2009
 - 14A. Site-Specific Water Quality Monitoring Plan, July 2006
15. Documentation of Environmental Indicator Determination Interim Final, February 5, 1999
16. RCRA Corrective Action Environmental Indicator Forms Addendum, completed by Wade Cornwall (DTSC), Michael Choe (DTSC), Jennifer Wu (EPA), April 5, 2000
17. California Regional Water Quality Control Board, Central Valley Region, Waste Discharge Requirements Order 99-08 (June 11, 1999) ("Water Board Order")
18. CWM Petition for Review, Supplemental Brief, submitted February 25, 2008
19. Comprehensive Groundwater Monitoring Evaluation Report for Chemical Waste Management, Inc., Bakersfield Facility, dated September 3, 2002
20. ET Cover Performance and Leachate Source Evaluation Report (Cover Performance Report), March 17, 2009
 - 20A. ET Cover vs. Prescriptive Cover, March 2009
 - 20B. Final Cover Modeling Report, March 2009
21. CWM Bakersfield Post-Closure Inspection 2008, prepared by Centra Consulting, dated September 19, 2008
22. Closure Cap Repair Maintenance Memorandum, March 19, 1991 and Rainstorm Report