

ADMINISTRATIVE RECORD
for
DUCOMMUN AEROSTRUCTURES INC. EL MIRAGE FACILITY
POST-CLOSURE PERMIT ISSUED MARCH 8, 2010

- LIST OF DOCUMENTS -

The following documents are provided to the DTSC Appeals Office as the Administrative Record for the Final Permit Decision of the Hazardous Waste Post-Closure Facility Permit issued on March 8, 2010 to Ducommun AeroStructures Inc. El Mirage Facility (CAD093245645). The Administrative Record documents are provided to the DTSC Permit Appeals Office in electronic files stored on the attached recordable DVD-R. The documents on the DVD-R are listed below in chronological order. All of these documents are available for public review and are stored at the DTSC Cypress Office.

- **(1986 Sept) - Aerochem RCRA Facility Assessment (RFA)**
“RCRA FACILITY ASSESSMENT OF SOLID WASTE MANAGEMENT UNITS AT AEROCHEM, INC., EL MIRAGE, CALIFORNIA, EPA Region 9 Number CAD093245645”, dated September 5, 1986. Submitted by A.T. Kearney, Alexandria, VI, and by Science Applications International Corporation, Bellevue, WA. Submitted to EPA Region 9, San Francisco, CA. *[NOTE: Scan of copy located in the DTSC Cypress office. File copy does not have pages 34 and 35.]*
- **(1987 May) - CRWQCB Cleanup and Abatement Order**
“CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD, LAHONTAN REGION, CLEANUP AND ABATEMENT ORDER NO. 87-10 - Requiring Aerochem Inc. (El Mirage Chemical Milling Facility) to Cleanup and Abate the Discharge of Caustic Wastewater to Groundwaters of the El Mirage Hydrologic Subunit of the Mojave Hydrologic Unit.” Signed May 12, 1987.
- **(1991 Nov) - Aerochem Closure Certification [As-Built] Report**
“AS-BUILT REPORT FOR THE AEROCHEM EL MIRAGE POND CLOSURE, ADELANTO, CALIFORNIA”, dated November 27, 1991, Prepared by The Earth Technology Corporation, Irvine, CA. Prepared for Aerochem, Inc., Orange, CA. *[NOTE: Scan provided by Ducommun, as attached to the Permit Renewal Application (electronic version). A number of large figures and maps are missing from the Figure Section in the electronic file, but available in the hard copy located in the DTSC Cypress Office. The rest of the electronic file appears to match the DTSC hard copy.]*
- **(1992 May) - Additional Closure Certification Information**
Letter: from Aerochem to DTSC-Long Beach, dated May 21, 1992, re: Closure Report for Aerochem, Inc. - El Mirage Facility, (EPA ID No. CAD0932456).
- **(1992 June) - DTSC Approval of Aerochem Closure Certification**
Letter: from DTSC-Long Beach, to Aerochem-Adelanto, dated June 22, 1992, re: CLOSURE CERTIFICATION: AEROCHEM, INC. - EL MIRAGE FACILITY, (EPA ID NO. CAD 093245645).
- **(1995 Nov) - 1995 Aerochem Post-Closure Permit**
California Environmental Protection Agency, Department of Toxic Substances Control, Region 4, Long Beach, Hazardous Waste Facility Post-Closure Permit; Aerochem, Inc., 4001 El Mirage Road, Adelanto, California 92301; EPA ID Number: CAD09324545. Sign-Issued: 11-27-95. Effective Date: January 9, 1996. Expiration Date: January 9, 2006.
- **(2004 Apr) - Ducommun Demonstration Report**
“DEMONSTRATION REPORT - TCE, PCE, AND CHROMIUM FROM SOURCES OTHER THAN REGULATED UNIT, DUCOMMUN AEROSTRUCTURES EL MIRAGE FACILITY, EL MIRAGE, CALIFORNIA”, dated April 2004. Prepared by Balderman Consulting, Inc., Dana Point, CA. Prepared for Ducommun AeroStructures, Inc., El Mirage, CA. Transmittal letter dated April 14, 2004.
[NOTE: Scan provided by Ducommun, as attached to the Permit Renewal Application (electronic version).]
- **(2004 Sept) - DTSC-GSU Memo Reviewing Ducommun Interim Measures Workplan (June 15, 2004)**
Memo: from DTSC-Geological Services Unit, to DTSC-Permitting Branch, re: REVIEW OF “INTERIM MEASURES WORKPLAN, DUCOMMUN AEROSTRUCTURES EL MIRAGE FACILITY, EL MIRAGE, CALIFORNIA. Memo dated September 2, 2004.
- **(2004 Sept) - DTSC Letter to Ducommun Transmitting DTSC-GSU Memo dated September 2, 2004.**
Letter: from DTSC-Glendale to Ducommun-Adelanto, re: REVIEW OF INTERIM MEASURES WORKPLAN, DUCOMMUN AEROSTRUCTURES (FORMERLY AEROCHEM, INC.), EL MIRAGE FACILITY, EPA I.D. # CAD093245645. Letter dated September 8, 2004. Attached Memo from DTSC-GSU, to DTSC Permitting, Memo dated September 2, 2004.

- **(2004 Sept) - DTSC-GSU Memo Reviewing Several Historical Documents for Ducommun (including Demonstration Report dated April 2004)**
Memo: from DTSC-Geological Services Unit, to DTSC Permitting Branch, re: SUMMARY OF FACILITY INVESTIGATION ISSUES AT DUCOMMUN AEROSTRUCTURES EL MIRAGE FACILITY, EL MIRAGE, CALIFORNIA. Memo dated September 14, 2004.
- **(2004 Sept) - DTSC Letter to Ducommun Transmitting DTSC-GSU Memo dated September 14, 2004.**
Letter: from DTSC-Glendale, to Ducommun-Adelanto, re: SUMMARY OF FACILITY INVESTIGATION ISSUES, DUCOMMUN AEROSTRUCTURES (FORMERLY AEROCHEM, INC.), EL MIRAGE FACILITY, EPA I.D. # CAD093245645. Letter dated September 22, 2004. Attached Memo from DTSC-GSU, to DTSC Permitting, Memo dated September 14, 2004.
- **(2009 May) - Draft Post-Closure Cost Estimate by DTSC**
Email and Attachments. Email from DTSC to Ducommun, sent May 12, 2009 16:52, subject: Ducommun Post-Closure Permit Application. Attachments included: "DTSC Memo DAS WQSAP Approval.pdf"; "Memo PCC Cost Est (2009.05.12 draft).pdf"; "DAS PC Care Cost Est Worksheet (2009.05.07 dtsc).pdf".
- **(2009 June) - Final Post-Closure Cost Estimate by DTSC**
Memo-to-Administrative File for Ducommun AeroStructures El Mirage Facility, re: REVIEW AND RECALCULATION OF POST-CLOSURE COST ESTIMATE FOR DUCOMMUN AEROSTRUCTURES EL MIRAGE FACILITY (CAD093245645), dated June 12, 2009.
- **(2009 June) - DTSC Memo-to-File re Ducommun Solid Waste Management Units (SWMUs)**
Memo: from DTSC-Permitting, to Ducommun File, re: LIST OF SOLID WASTE MANAGEMENT UNITS FOR DUCOMMUN AEROSTRUCTURES EL MIRAGE FACILITY (CAD093245645). Memo dated June 15, 2009.
- **(2009 August) - Technical Completeness Letter**
Letter from DTSC to Ducommun, dated August 26, 2009, re: TECHNICAL COMPLETENESS FOR POST CLOSURE PERMIT APPLICATION, DUCOMMUN AEROSTRUCTURES EL MIRAGE FACILITY (CAD093245645).
- **(2009 Oct) Resending of Draft Post-Closure Cost Estimate to Ducommun**
Email and Attachments. Email from DTSC to Ducommun, sent October 21, 2009 15:47, subject: Ducommun Post-Closure Permit Application. Attachments included: "DTSC Memo DAS WQSAP Approval.pdf"; "Memo PCC Cost Est (2009.05.12 draft).pdf"; "DAS PC Care Cost Est Worksheet (2009.05.07 dtsc).pdf".

DRAFT PERMIT

- **(2009 May) - Permit Application for draft Permit**
"Ducommun AeroStructures -- Post-Closure Permit Application", dated February 9, 2009; and Revised Appendix 5 "Ducommun AeroStructures -- May 2009, Surface Impoundment Post-Closure, Water Quality Sampling and Analysis Plan, Appendix 5", dated March 2009, submitted May 22, 2009.
- **(2009 June) - Draft CEQA Notice of Exemption for draft Permit**
"-DRAFT 2009 June 24 DRAFT -, NOTICE OF EXEMPTION", Project Title: Post-Closure Permit Renewal for Ducommun AeroStructures El Mirage Facility.
- **(2009 Sept) - Ducommun Draft Post-Closure Permit for Public Review**
California Environmental Protection Agency, Department of Toxic Substances Control, HAZARDOUS WASTE POST-CLOSURE FACILITY PERMIT; Facility: Ducommun AeroStructures, Inc., 4001 El Mirage Road, El Mirage, California 92301, San Bernardino County; FACILITY EPA ID NUMBER: CAD 093 245 645; EFFECTIVE DATE: April 13, 2010; EXPIRATION DATE: April 13, 2020; Sign-Issued: 3/8/2010.
- **(2009 Sept) - Fact Sheet for Ducommun Draft Post-Closure Permit**
Fact Sheet, September 2009, "Ducommun AeroStructures Draft Post-Closure Permit is Available for Review".
[NOTE: DTSC misspelled the previous facility "Anadite" in the earlier version of the Fact Sheet. It was incorrectly spelled "Andalite". The Fact Sheet with the misspelling was sent out with the public notice. The misspelling was found and corrected less than one week after public notice. Both versions are presented in the Administrative Record.]
- **(2009 Sept) - Public Notice for Public Review of Ducommun Draft Post-Closure Permit**
"Notice of Public Comment Period and Public Meeting, Draft Post-Closure Permit for Ducommun AeroStructures El Mirage Facility, San Bernardino County, California, Public Comment Permit: September 9, 2009 through October 26, 2009".
- **(2009 Sept) - Mailing List for Public Notice of Ducommun Draft Post-Closure Permit**
Facility Mailing List used for Draft Post-Closure Permit Review Period.

- **(2009 Sept) - Radio Announcement for Public Notice of Ducommun Draft Post-Closure Permit**
PAID RADIO ANNOUNCEMENT, 60 Second Announcement, AIR ONCE ONLY, AIR DATE: September 9, 2009.

FINAL PERMIT

- **(2010 Feb) - Revised Permit Application for Post-Closure Permit**
“Ducommun AeroStructures -- Post-Closure Permit Application”, dated February 9, 2009; and Revised Appendix 5 “Ducommun AeroStructures -- May 2009, Surface Impoundment Post-Closure, Water Quality Sampling and Analysis Plan, Appendix 5”, dated March 2009, submitted May 22, 2009; and Revised Pages changing “Ducommun AeroStructures” to “Ducommun AeroStructures, Inc.”, submitted February 15, 2010.
- **(2009 Sept) - Public Comment 1 for Public Review of Ducommun Draft Post-Closure Permit**
Comment Form: from Michael E. Neumeyer, 18880 Sheep Creek Rd. Received September 14, 2010 by DTSC via postal mail.
- **(2009 Oct) - Public Comment 2 for Public Review of Ducommun Draft Post-Closure Permit**
Comment Form: from Roni Becker, 19376 Monroe Rd. Hand delivered to DTSC during Public Meeting held October 15, 2009.
- **(2009 Oct) - Public Comment 3 for Public Review of Ducommun Draft Post-Closure Permit**
Letter: from Charles H. Pomeroy, McKenna Long & Aldridge, dated October 26, 2009, RE: Ducommun Aerostructures, Inc. Draft Post-Closure Permit, 4001 El Mirage Road, El Mirage, CA.
- **(2010 Mar) - Response to Comments from Public Review of Ducommun Draft Post-Closure Permit**
“RESPONSE TO COMMENTS, Public Comment Period for Draft Post-Closure Permit, Ducommun AeroStructures, Inc., El Mirage, California, March 4, 2010.”
- **(2010 Mar) - Edited Version of Ducommun Draft Permit Showing Changes to Final (redline/strikeout)**
California Environmental Protection Agency, Department of Toxic Substances Control, HAZARDOUS WASTE POST-CLOSURE FACILITY PERMIT - EDITED VERSION -, (redline/strikeout). Edited Version dated March 04, 2010.
- **(2010 Mar) - Final CEQA Notice of Exemption for Ducommun Post-Closure Permit**
NOTICE OF EXEMPTION, Project Title: Post-Closure Permit Renewal for Ducommun AeroStructures El Mirage Facility. Signed 3/8/2010. RECEIVED MAR 10, 2010 STATE CLEARING HOUSE.
- **(2010 Mar) - Final Post-Closure Permit for Ducommun AeroStructures Inc. El Mirage Facility**
California Environmental Protection Agency, Department of Toxic Substances Control, HAZARDOUS WASTE POST-CLOSURE FACILITY PERMIT; Facility: Ducommun AeroStructures, Inc., 4001 El Mirage Road, El Mirage, California 92301, San Bernardino County; FACILITY EPA ID NUMBER: CAD 093 245 645; EFFECTIVE DATE: April 13, 2010; EXPIRATION DATE: April 13, 2020; Sign-Issued: 3/8/2010.
- **(2010 Mar) - Final Permit Decision Letter to Facility**
Letter from DTSC to Ducommun dated March 9, 2010, re: FINAL HAZARDOUS WASTE POST-CLOSURE FACILITY PERMIT DECISION FOR DUCOMMUN AEROSTRUCTURES, INC EL MIRAGE FACILITY (CAD093245645).
- **(2010 Mar) - Final Permit Decision Public Notice, to Facility Mailing List**
NOTICE OF FINAL HAZARDOUS WASTE POST-CLOSURE FACILITY PERMIT DECISION - DUCOMMUN AEROSTRUCTURES, INC. EL MIRAGE FACILITY (CAD093245645). “To Interested Party:”, dated March 9, 2010.
- **(2010 Mar) - Facility Mailing List for Final Permit Decision**
Facility Mailing List for Public Notice (56x contacts).
- **(2010 Mar) - Public Notice to Commenter for Final Permit Decision, to Commenters**
NOTICE OF FINAL HAZARDOUS WASTE POST-CLOSURE FACILITY PERMIT DECISION - DUCOMMUN AEROSTRUCTURES, INC. EL MIRAGE FACILITY (CAD093245645). “To Person Who Submitted a Comment:”, dated March 9, 2010.
[NOTE: The Response to Comments Document was attached to the Public Notice to Commenters.]
- **(2010 Mar) - Mailing List for Public Notice to Commenters**
Facility Mailing List for Public Notice to Commenters (3x contacts).

PERMIT DECISION APPEAL

- **(2010 Apr) - Request for Review / Appeal of Permit Decision**
Letter: from CHPomeroy/McKenna Long & Aldridge, representing Ducommun, to DTSC Permit Appeals Officer, re: Appeal of Decision per Title 22, CCR §66271.18, Ducommun Aerostructures, Inc. Post-Closure Permit, 4001 El Mirage Road, El Mirage, CA. Letter dated April 8, 2010.
- **(2010 Apr) - DTSC Acknowledgement of Appeal and Stay of Final Permit Decision for Ducommun**
Letter: from DTSC-Permit Appeals Office, to Ducommun-El Mirage, re: ACKNOWLEDGEMENT OF APPEAL AND STAY OF FINAL PERMIT DECISION FOR DUCOMMUN AEROSTRUCTURES INC., SAN BERNARDINO COUNTY, CALIFORNIA, EPA ID. NO. CAD093245645. Letter dated April 15, 2010.
- **(2010 Apr) - Appeals Officer Request for Administrative Record for Ducommun**
EMail: from DTSC Permit Appeals Office, to DTSC Permitting, subject: Request for Administrative Record for Ducommun AeroStructures, Inc., Post Closure Permit. Email sent 2010/04/15-12:08.
- **(2010 Apr) - List of Documents for Administrative Record**
“ADMINISTRATIVE RECORD for DUCOMMUN AEROSTRUCTURES INC. EL MIRAGE FACILITY, POST-CLOSURE PERMIT ISSUED MARCH 8, 2010 - LIST OF DOCUMENT -”, list and files compiled by Stephen Baxter, DTSC Chatsworth Office, 2010 April 26

List and files compiled by
Stephen Baxter
DTSC Chatsworth Office
2010 April 26