

STATEMENT OF BASIS

for the Proposed Modification to Closure Plan for the
Gallade Chemicals, Incorporated Hazardous Waste Drum Storage Area

The Department of Toxic Substances Control (DTSC) has reviewed the following documents (1) "Groundwater Monitoring and Remediation Report", dated September 22, 2000, prepared on Gallade Chemicals, Inc.'s (Gallade) behalf by IT Corporation; (2) "Corrective Action Plan", dated September 2, 1999, prepared on Gallade's behalf by EMCON; (3) "Hazardous Waste Drum Storage Area Closure Assessment Report", dated September 30, 1996, prepared on Gallade's behalf by EMCON; and, (4) "Final Closure Plan Hazardous Waste Drum Storage Area, Gallade Chemical, Incorporated", dated October 6, 1995.

Based on the data presented in these documents, it is clear that the "Hazardous Waste Drum Storage Area", a hazardous waste management unit (HWMU), has contributed to soil and groundwater contamination. Based on Document (1), despite on-going clean-up efforts under the auspices of the Santa Ana Regional Water Quality Control Board (SARWQCB), lead agency for corrective action at the facility, hazardous wastes have not been cleaned up and remain in the saturated zone materials underlying the HWMU. Moreover, based on Document (3), significant hazardous waste contamination remains in the unsaturated (vadose) zone materials underlying the HWMU. Document (3) clearly demonstrates that releases of hazardous waste constituents of concern occurred to the surface of the HWMU which penetrated the concrete of the HWMU and into the underlying soil to a depth of at least two (2) feet below ground surface (bgs) with concentrations of perchloroethylene (PCE) of 7,387 µg/kg being reported.

Depth to ground water at MW-3, adjacent to the HWMU, has been reported in document (1) above as being as shallow as 4.25 feet bgs (2/3/98). Even though this groundwater has been described as being perched, it is highly likely to be in hydraulic continuity with slightly deeper groundwater; for example, 1790 feet bgs (2/3/98) has been reported for nearby MW-18.

Release(s) from the HWMU have contaminated the underlying soils and ground water and have not been cleaned up to suitable closure performance standards. Therefore the HWMU is subject to post-closure requirements under California Code of Regulations, title 22, section 66264.117. The originally approved (by DTSC) closure plan dated October 6, 1995 does not propose removal of contaminated soils, nor does it propose specific soil cleanup of any kind.

Document (2) proposes site-wide soil vapor extraction as a means of cleaning up the unsaturated zone including hazardous wastes released from the HWMU. Document (1) describes intermittent groundwater extraction and treatment from

MW-2 and MW-3 and indicates that a proposal for a dual-phase extraction system was submitted to the SARWQCB in September 1999 which would include removal and treatment of hazardous wastes released from the HWMU.

Closure activities have been on-going since DTSC's approval of Document (4), as referenced above, in May 22, 1996. It is expected that removal of hazardous wastes from soil and ground water at the facility will take considerable additional time to achieve appropriate closure performance standards. Therefore, DTSC has determined that the closure must be completed with waste in place and that Gallade must submit a closure certification to this effect.

The proposed Modification to Closure Plan is intended to allow such completion of closure. Moreover, Gallade must submit a Post-closure Care Plan to provide for post-closure care of the HWMU after closure. The Post-closure Care Plan is required by California Code of Regulations, title 22, sections 66270.1 and 66264.117. The Post-closure Care Plan shall address applicable requirements of California Code of Regulations, title 22, division 4.5, including those of chapter 14, and those pertaining to water quality monitoring, corrective action, and post-closure care.