



March 25, 2020

Mr. Stephen McArdle
Project Manager
Department of Toxic Substances Control
9211 Oakdale Avenue
Chatsworth, California 91311

sent via email to Stephen.McArdle@dtsc.ca.gov

Subject: Request for Interim Measure Field Work Schedule,
Phibro-Tech, Inc., Santa Fe Springs, California (Site or Facility)

Dear Steve:

On behalf of Phibro-Tech, Inc. (Phibro-Tech), Terraphase Engineering is submitting this discovery notification for a previously unidentified Solid Waste Management Unit (SWMU) at the Phibro-Tech Facility located at 8851 Dice Road, Santa Fe Springs, California. This submittal is issued pursuant to part V, section E.13.b of the Hazardous Waste Facility Permit 1995 Corrective Action Permit Modification and section 5.2 of the Corrective Action Consent Order dated February 22, 2012.

The newly identified SWMU (new SWMU) is currently not a threat to human health or the environment. All indications are that the discovered chromium impacts to soil predate the current configuration of the Facility and appear to have been associated with operations prior to 1980.

Ongoing soil investigations in the southwest portion of the Facility encountered yellow discolored soils beneath an upper fill layer below current pavement (Figure 1). Laboratory testing of soil samples from the area indicate that both trivalent and hexavalent chromium are present. No elevated concentrations of other chemicals of concern were reported.

Thirty-two soil borings were drilled and sampled to characterize the depth and areal extent of the soil impacts. Over 240 soil samples and two grab groundwater samples were analyzed by the laboratory. The extent of the soil impacts is reasonably well defined and limited to the Facility property (Figure 2).

Review of historical documents compiled by CDM and presented in the 2005 Conceptual Site Model report (CDM 2005) located two chromium-related tanks that were operated in the same location as the discovery. Thus, the new SWMU can reasonably be associated with historical operations. Substantial environmental investigations were conducted in this area by USEPA Contractors, DTSC, and previous consultants. However, no documentation has been identified suggesting that a SWMU existed in the area or that soil sampling performed in the area detected a consistently impacted zone.

Groundwater monitoring for the new SWMU area is within the range of existing downgradient wells MW-15S and D. This well pair has consistently had reported concentrations of total and hexavalent chromium similar to, or below, background concentrations. These data indicate that the new SWMU

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area has not adversely impacted groundwater conditions in the Hollydale Aquifer at least since monitoring began at wells MW-15S&D in 1990.

Terraphase verbally notified DTSC staff of these findings on March 11, 2020 after evaluating whether the data indicates a previously unidentified SWMU associated with historical operations.

Terraphase, on behalf of Phibro-Tech, also communicated to DTSC, its intent to mitigate this newly discovered area of impact pursuant to the Interim Remedial Measure (IRM) program currently in place. A separate work plan supplement will be submitted to DTSC shortly, proposing the application of calcium polysulfide solution (CPS) injections in the discovery area.

If you have any question or comments regarding this submittal, please contact me at (510) 645-1850, x58.

For Terraphase Engineering Inc.

A handwritten signature in black ink, appearing to read "CS Alger", with a long horizontal flourish extending to the right.

Christopher S. Alger, PG, CEG, CHG
Principal Engineering Geologist

cc:

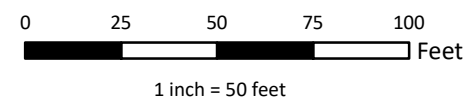
David Thaete, Phibro-Tech, Inc.

Dwight Glover, Phibro-Tech, Inc.

Zack Walton, SSL Law Firm LLP

Attachments: Figures 1 and 2

Notes:
Dimensions and Shape of Containment are Approximate



SAFETY FIRST



CLIENT:	Phibro-Tech, Inc.
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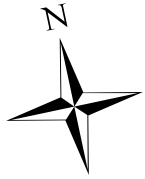
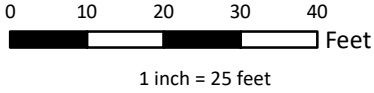
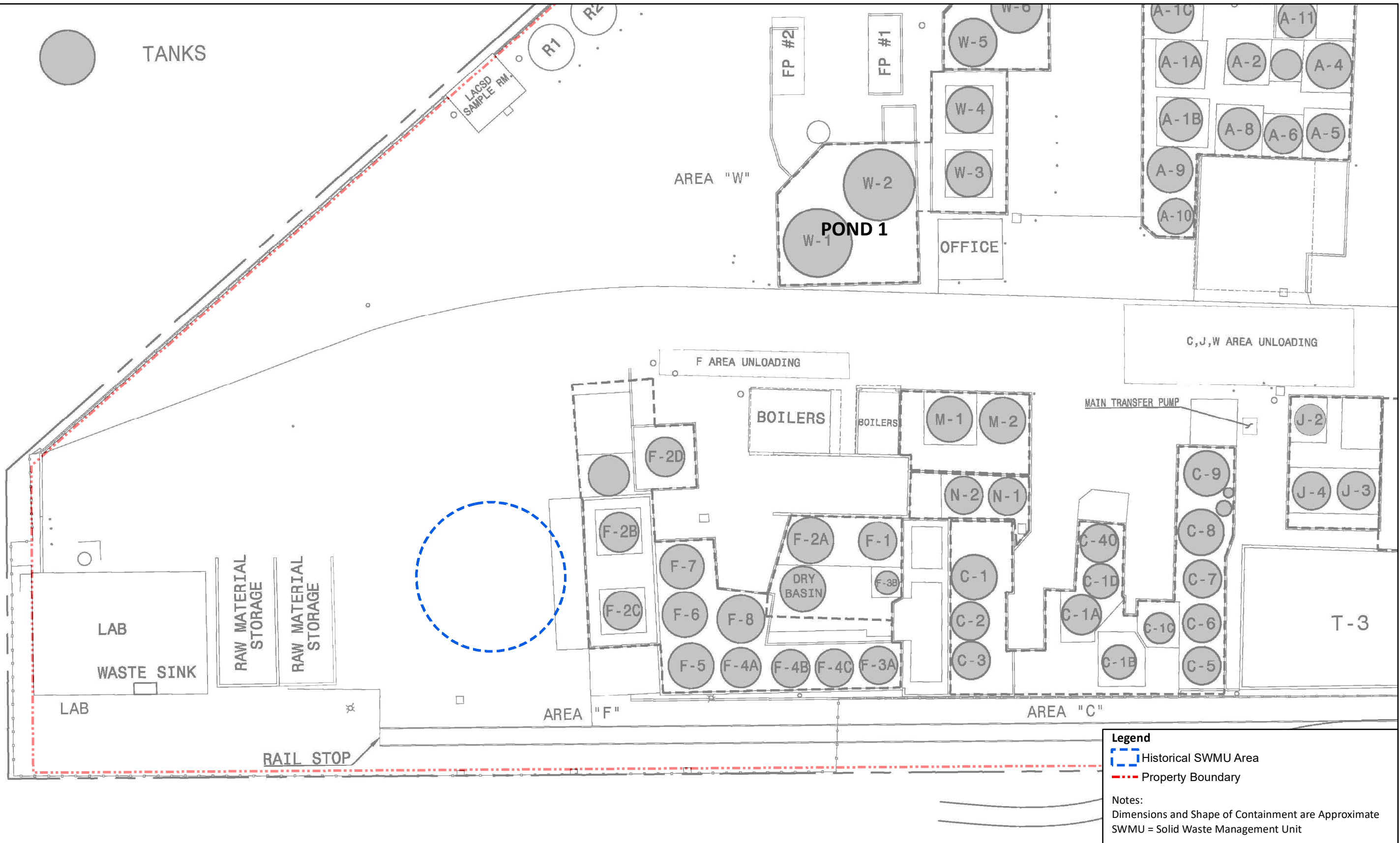
PROJECT:	Wastewater Treatment - Relocation Investigation Santa Fe Springs, CA
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PROJECT NUMBER:	0197.010.004
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Site Plan

FIGURE 1

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SAFETY FIRST 	CLIENT: Phibro-Tech, Inc.	Historical SWMU Area FIGURE 2
	PROJECT: Wastewater Treatment - Relocation Investigation Santa Fe Springs, CA	
	PROJECT NUMBER: 0197.010.004	