



California Regional Water Quality Control Board

Santa Ana Region



Terry Tamminen
Secretary for
Environmental
Protection

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**Arnold
Schwarzenegger**
Governor

September 2, 2004

Mr. Peter A. Nyquist
Weston Benshoof Rochefort Rubalcava MacCuish LLP
333 South Hope Street, Sixteenth Floor
Los Angeles, CA 90071

APPROVAL OF PROPOSED WORK PLAN ADDENDUM FOR ADDITIONAL PERCHLORATE INVESTIGATION AT ASTRO PYROTECHNICS (LOT 7), 2298 WEST STONEHURST DRIVE, CITY OF RIALTO, SAN BERNARDINO COUNTY

Dear Mr. Nyquist:

Board staff has reviewed the August 13, 2004 submittal entitled "Addendum to Work Plan for Additional Perchlorate Investigation" for San Bernardino County assessor Parcel No. 1133-071-07, 2298 West Stonehurst Drive (site), Rialto, California. Kleinfelder submitted the work plan on behalf of your client, Pyro Spectaculars, Inc., on August 13, 2004, in compliance with Cleanup and Abatement Order (CAO) No. R8-2004-0042. The CAO was adopted by the Regional Board on April 30, 2004, for investigation and cleanup of perchlorate at the five-acre parcel by Pyro Spectaculars, Inc, Thomas O. Peters and the Peters Trust, and Whittaker Corporation. I approve the proposed work plan addendum, which describes changes and modifications to the proposed work plan that I approved on July 16, 2004.

The objective of the proposed additional investigation is to further assess the lateral and vertical extent of perchlorate in the soil beneath the former liquid collection pads, specifically those associated with the chemical mixing rooms in Building Nos. 1, 8, 10 and 15.

The proposed field work at Lot 7 and at one location on Lot 6 of the site consists of a total of 17 soil borings to be drilled using a combined direct-push and hollow-stem auger drilling technology. On July 23, 2004, Board staff and Ms. Lizanne Simmons of Kleinfelder and other interested parties inspected the site and identified the proposed soil sampling locations. As a result of the joint site visit, the following modifications are proposed in the addendum:

- Addition of soil sample location B-5, adjacent to the concrete pathway near Building No. 15.
- Repositioning of several proposed soil borings surrounding former liquid collection pads.
- Addition of two surface soil samples at soil borings B-3D and B-4D.
- Advancing three soil borings, B-2D, B-3D and B-5 to total depths of approximately 10 feet below ground surface (bgs) instead of 50 feet.

All soil borings (except B-2D, B-3D and B-5) will be advanced to maximum depths of 50 feet, or to the point of refusal of the drill rig. Soil samples are proposed to be collected at 10-foot

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intervals or where observed field conditions suggest the potential for favorable recoveries (i.e. to recover fine-grained materials where available). Soil samples will be analyzed for perchlorate, using U.S. EPA Method 314.0. In addition to perchlorate, the 10-foot soil samples collected from the 14 proposed deep borings will be analyzed for specific metals and several other analytes which are listed on Page 2 of the work plan addendum, while the 20-foot soil samples will be analyzed for volatile organic compounds (VOCs), using U.S. EPA Method 8260B. However, with respect to the 3 boring locations to be advanced to total depths of 10 feet bgs, soil samples will be collected at approximate depths of 5 and 10 feet bgs. Both of the soil samples from these borings will be analyzed for perchlorate, metals and VOCs.

Since the work plan addendum did not include a schedule for completion of the field work and submittal of the final report, Board staff contacted Ms. Lizanne Simmons of Kleinfelder on August 24, 2004. Ms. Simmons stated that 60 days is needed to complete the project and prepare a final report. This schedule is approved. The final report must be submitted by November 2, 2004.

Please be aware that the need for additional site investigation of the soil and groundwater will be evaluated once this phase of investigation has been completed and Board staff has reviewed and evaluated the soil sampling results.

Please notify the following individuals at least 24 hours prior to all field work to allow for inspection and oversight as needed: Kamron Saremi, RWQCB, (951) 782-4303 and Wendy Arano, DTSC, (714) 484-5480.

If you have any questions, please contact me at (951) 782-3286, or Robert Holub, Division Chief, at (951) 782-3298.

Sincerely,

Kurt V. Berchtold
Assistant Executive Officer

cc: Jorge Leon, SWRCB, Office of Chief Counsel
Bruce Cash, United Strategies
Lizanne Simmons, Kleinfelder
John Van Vlear, Voss Cook & Thel LLP
Richard Dongell, Dongell Lawrence Finney, LLP
Inland Empire Perchlorate Regulatory Task Force (mailing list attached)

KS: Rialto perchlorate/CAOR8-2004-0042/AstroPyroworkplanaddendum