

**TRANSPORTATION PLAN
FOR HAZARDOUS WASTE MANAGEMENT FACILITY CLOSURE
SANTA SUSANA FIELD LABORATORY, AREA IV
VENTURA COUNTY, CALIFORNIA
EPA ID NO. CAD000629972**

Prepared for:

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TABLE OF CONTENTS

| <u>Section</u> | <u>Page</u> |
|--|--------------------|
| 1.0 INTRODUCTION | 1-1 |
| 2.0 PURPOSE AND OBJECTIVE | 2-1 |
| 3.0 CHARACTERISTICS OF WASTE/MATERIAL TO BE TRANSPORTED..... | 3-1 |
| 4.0 DESTINATION OF WASTE/MATERIAL | 4-1 |
| 5.0 TRANSPORTATION MODE..... | 5-1 |
| 6.0 ROUTES | 6-1 |
| 7.0 TRAFFIC CONTROL AND LOADING PROCEDURES | 7-1 |
| 8.0 RECORD KEEPING | 8-1 |
| 9.0 HEALTH AND SAFETY | 9-1 |
| 10.0 CONTINGENCY PLAN | 10-1 |

LIST OF FIGURES

| | |
|------------|---|
| Figure T-1 | Site Location Map |
| Figure T-2 | Location of T133 and T029 |
| Figure T-3 | Transportation Route Detail – Inside SSFL |
| Figure T-4 | Transportation Route Detail – SSFL to State Highway 118 |
| Figure T-5 | Transportation Route Detail – Route to Chem Tech, Los Angeles, California |
| Figure T-6 | Transportation Route Detail – Route from State Highway 118 to Chemical Waste Management, Kettleman Hills Facility, Kettleman City, California |

LIST OF ATTACHMENTS

| | |
|--------------|--------------------------------|
| Attachment A | Contaminants of Concern – HWMF |
|--------------|--------------------------------|

LIST OF ACRONYMS

| | |
|---------|---|
| 118 Fwy | Ronald Reagan 118 Freeway |
| 210 Fwy | Pasadena Freeway 210 |
| 5 Fwy | Golden State Freeway 5 |
| AIS | American Integrated Services, Inc. |
| CFR | Code of Federal Regulations |
| CHP | California Highway Patrol |
| COC | contaminant of concern |
| dba | decibels, A-Scale |
| DTSC | Department of Toxic Substances Control |
| EPA | U.S. Environmental Protection Agency |
| EZ | exclusion zone |
| HWMF | Hazardous Waste Management Facility |
| KOH | potassium hydroxide |
| NaK | sodium-potassium |
| NaOH | sodium hydroxide |
| NOx | nitrogen oxide |
| NTS | Nevada Test Site |
| RCRA | Resource Conservation and Recovery Act |
| SSFL | Santa Susana Field Laboratory |
| TSDF | Treatment, Storage, and Disposal Facility |

1.0 INTRODUCTION

This Transportation Plan was prepared by MWH Americas, Inc., in accordance with the Department of Toxic Substances Control (DTSC) document, “*Guidance for Developing Transportation Plans for Removal or Remedial Actions*,” Interim Final, dated May 19, 1994.

This Transportation Plan is an integral part of the Closure Plan for Hazardous Waste Management Facility (HWMF) – Buildings T029 and T133, Santa Susana Field Laboratory, Area IV, Ventura County, California, U.S. Environmental Protection Agency (EPA) ID No. CAD000629972. Amendments to this plan to reflect the use of different project personnel, transportation companies, demolition contractor or disposal facility may be made. This Transportation Plan will be packaged as a stand-alone document so it can be used for training and distribution purposes for all personnel involved in the transportation segment, including each truck driver. The Health and Safety Plan prepared for closure of the HWMF will also be provided to personnel involved in the transportation segment.

The content and the format of the Transportation Plan follows the format described in the DTSC guidance document referenced above and described below:

1. Introduction (Background)
2. Purpose and Objective
3. Characteristics of Waste/Material to be Transported
4. Destination of Waste/Material
5. Transportation Mode
6. Routes
7. Traffic Control and Loading Procedures
8. Record Keeping
9. Health and Safety
10. Contingency Plan

1.1 BACKGROUND

1.1.1 Site Location

The Site is the Hazardous Waste Management Facility (HWMF), consisting of buildings T029 and T133 (also known as Buildings 4133 and 4029, respectively) in Area IV of the Santa Susana Field Laboratory (SSFL). The Site is owned by the United States Department of Energy and is co-operated by Boeing and the U.S. Department of Energy.

The SSFL is located in the Simi Hills of southeastern Ventura County in Southern California, approximately 29 miles northwest of Los Angeles. Figure T-1 shows the general location of the SSFL in the region. The HWMF consists of Buildings T133 and T029, which are located toward the west and northwestern parts of the SSFL, within Area IV. The locations of Buildings T133 and T029 within the SSFL are shown on Figure T-2.

1.1.2 Site History

The HWMF was used for the storage and treatment of non-radioactive metallic sodium and NaK (a liquid mixture of sodium and potassium) wastes from various test components (pumps, valves, etc.). The facility was operated from 1978 to 1997. The HWMF consisted of two buildings: T029, the storage building, and T133, the treatment building.

Building T029 was operated as storage facility for the containerized alkali metal waste material. The facility is currently not active. The building consists of an 800-square foot steel frame with corrugated steel roof and siding, constructed on a concrete pad. There is a 20-foot wide and approximately 125-foot long asphalt driveway leading to the facility. Metal boxes (referred to as B-boxes), and drums containing waste components were stored on pallets along the perimeter of the building, allowing approximately 12 feet of aisle space in the middle of the building. Total storage capacity at T029 was approximately 5,500 gallons in any combination of containers.

Alkali metals were treated at the Building T133 area. The overall area is fenced and is approximately 87 by 71 feet. The T133 area was designed and constructed in 1978 for the treatment of alkali metals. This area includes the treatment building, the office building, two sodium hydroxide storage tanks (referred to as tanks T-1 and T-3), and a NaK feed tank (referred to as Tank T-2).

Building T133 was operated as a metallic sodium treatment facility from 1978 to 1997. The facility was used to react sodium and NaK to form sodium hydroxide and potassium hydroxide. The facility is no longer active. The building itself includes a treatment chamber where the alkali metals were reacted and an adjacent control room/office area. External to the building is a scrubber, a preparation and handling pad, a subsurface belowground steel-lined 1,000-gallon collection tank (T-1), and a 5,000-gallon poly hydroxide storage tank with secondary containment (T-3) and a 270 gallon NaK stainless steel feed tank (T-2). The entire site sits on a footprint of approximately 6,000 square feet. The majority of the site is asphalt paving with some concrete for the building pad and foundation. The preparation handling pad and various support concrete slabs also include polymer coated surfaces.

1.1.3 Regulatory Status

Cal-EPA DTSC will have jurisdiction over this remediation performed at the HWMF as part of Closure activities.

1.1.4 Proposed Remediation

In general, the closure of the HWMF buildings involves the decontamination and dismantlement of facility structures and foundations, the sampling of the underlying soil to determine the presence, if any, of chemical impacts and the removal of the impacted soil as required.

The proposed remediation as part of Closure activities consists of facility decontamination using high-pressure water, structure demolition, and soil excavation, backfilling with clean soil as required and compaction. The off site transportation of wastes will take place following the demolition and excavation activities and are expected to take place more than a month apart.

1.1.5 Estimate of Excavation

At this stage of preparation of Closure Plan documents, the excavation has been estimated at 2,000 cubic yards of soil. This volume is just an estimate, based on the type and areas where wastes were handled at the HWMF. This volume estimate is not based on any analytical data, as no such data exist at this time. If larger quantities of soil are to be excavated, this fact will not constitute a major change to the HWMF Closure Plan, including this Transportation Plan, and no further approval would be needed.

2.0 PURPOSE AND OBJECTIVE

The purpose of the Transportation Plan is to minimize potential health, safety, and environmental risks resulting from the implementation of the proposed cleanup plan, particularly during loading, site entry, and egress, and during transportation of waste on public roads. The plan will be used as a stand-alone document by all personnel involved in the transportation of the contaminated soil to achieve the plan's purposes, including the proper implementation of the Contingency Plan.

3.0 CHARACTERISTICS OF WASTE/MATERIAL TO BE TRANSPORTED

Different types of waste will be generated during implementation of the following closure activities at the HWMF such as:

- Decontamination and demolition of structures
- Excavation of potentially contaminated soils

3.1.1 Appearance and Chemical Nature

The waste generated from decontamination and demolition of structures will include wastewater collected in aboveground tank or drums, concrete, asphalt, metallic debris from dismantling of tanks, treatment chamber, etc., and other construction material debris such as dry wall, roofing material, and wood. Other types of waste may include contaminated soils, if found, during investigations at the HWMF and groundwater generated from dewatering activities, if present during excavation of contaminated soils.

The types of contaminants suspected to be present at the HWMF are based on knowledge of material used, stored, or generated as part of activities. Testing has not been performed at the HWMF to determine the types and concentrations of suspect contaminants at the time this plan was prepared. A contaminant of concern (COC) list has been prepared as part of preparation of the Closure Plan and is included in Attachment A.

All generated wastes will be sampled, analyzed and managed in accordance with California Code of Regulations Title 22, Division 4.5. The waste will be classified and profiled in accordance with the analytical results.

3.1.2 Waste Source

The waste will be generated as part of implementation of the Closure Plan for the HWMF. The wastewater will be generated from decontamination of the structures at the HWMF, or if groundwater is encountered, from the dewatering of excavation areas. The demolition debris will be generated due to removal of structures at the HWMF (tanks, buildings, pipes, concrete and asphalt pavement, etc.). If the soil is found to be contaminated at levels exceeding the cleanup level, as described in the Closure Plan, the soils will be excavated. The generated waste may be contaminated with one or more suspect chemical, as described in the COC list.

3.1.3 Estimated Waste Quantity

The volume of demolition debris has been estimated based on visual inspection of the facilities. The amount of demolition debris has been estimated at approximately 10 to 20 truck loads. If additional trucks are needed, due to larger volume of demolition debris than currently anticipated, this fact will not constitute a major change to the Transportation Plan and no further approval will be necessary.

The volume of generated wastewater from decontamination activities has been estimated at 2,000 gallons. This is only an estimate, as this waste has not yet been generated. If additional water is used during decontamination activities, the change in wastewater volume will not be considered as a major change to this Transportation Plan, and no further approval will be necessary. Additional wastewater may be generated from dewatering activities, if near surface groundwater is found during excavation activities.

For purposes of providing an approximation of the amount of soil that might be excavated, a volume of 2,000 yd³ is proposed. This volume is an initial estimate, based on the type and areas where wastes were handled. This volume is not based on any analytical data, as no such data exist at the time when this plan was prepared. If larger quantities are to be excavated, the event

will not constitute a major change to this Transportation Plan, and no further approval would be needed.

3.1.4 Physical Nature of Contaminants

The physical nature of the generated demolition and excavation wastes is solid. It can be defined as soil or demolition debris with concentration of constituents of potential concern in the parts per million and below range. The wastewater generated from decontamination or dewatering activities will be liquid, with low concentrations of COCs.

3.1.5 Chemical Nature of Contaminants

For the purpose of disposal, chemical analysis will be conducted by collecting representative samples of the demolition debris, wastewater, and excavated material and analyzing them in a state-certified laboratory. The waste will be classified in accordance with regulations described in California Code of Regulations, Title 22, Sections 66261.21 to 66261.24.

Because no testing has yet been performed at the HWMF, a waste classification cannot be provided at this time.

3.1.6 Applicable Regulations for Waste Transportation

The following regulations are applicable to the management of the hazardous waste material generated from the cleanup:

| Training Requirements Department of Transportation Hazardous Material | Regulation 181 and Department of Transportation Hazardous Material 126 F. |
|--|--|
| Hazard Communication Standard | 28 CFR 1910, 1200 and 8 CCR 5094 |
| List of Hazardous Substances | 8 CCR Section 339 |
| Lethal or Permissible Exposure Limit | 8 CCR 51555 |

| Training Requirements Department of Transportation Hazardous Material | Regulation 181 and Department of Transportation Hazardous Material 126 F. |
|---|--|
| Emergency Response | 40 CFR Subpart G Section 172.600 |
| Hazards Material Regulations | 49 CFR 171, Section 180 |
| Motor Carrier Safety Regulation | 49 CFR Section 390 |
| Qualification of Drivers | 49 CFR Section 391 |
| Driving of Motor Vehicles | 49 CFR Section 392 |
| Parts and Accessories Necessary for Safety Operation | 49 CFR Section 393 |
| Notification and Reporting of Accidents | 49 CFR Section 394 |
| Hours of Service of Drivers | 49 CFR Section 395 |
| Inspection, Repair and Maintenance | 49 CFR Section 396 |
| Transportation of Hazardous Materials, Driving and Parking Rules | 49 CFR Section 397 |
| Personal Protective Equipment | 29 CFR 1910.95, 1910.132, 1910.133, 1910.134 and 1910.135. 8 CCR 5095, 3401, 3403, 3404 and 5144 |
| Hazardous Material Use and Control tracking, Monitoring, and Spill Control | 40 CFR 262 and 22 CCR 66262 |
| Material Handling | 29 CFR 1910.176 and 8 CCR 3650 |
| Hazardous Waste Transport | 29 CFR 1910.120 8 CCR 5192 |
| Identification and Listing of Hazardous Waste | 40 CFR 261 and 22 CCR 66261 |
| Standards Applicable to Generators of Hazardous Waste | 40 CFR 262 and 22 CCR 66262 |
| Standards Applicable to Transporters of Hazardous Waste | 40 CFR 263 and 22 CCR 66263 |
| Standards for Owners and Operators of Hazardous Waste Treatment, Storage and Disposal Facilities | 40 CFR 265 and 22 CCR 66265 |
| California Environmental Protection Agency Department of Toxic Substances Control “Transportation Plan, Preparation Guidance for Site Remediation”, Interim Final, May 1994 | |

4.0 DESTINATION OF WASTE/MATERIAL

4.1 DESTINATION OF CONTAMINATED SOIL FROM T133

4.1.1 Facility Identification and Facility Contact

The contaminated soil from Building T133 that is excavated as part of the remediation at the HWMF will be hauled to Chemical Waste Management, Kettleman Hills Facility.

Facility Address and Certification

Chemical Waste Management, Inc.
35351 Old Skyline Road
Kettleman Hills Facility
Kettleman City, California 93239
Class I hazardous waste landfill
Facility state ID# CAT000 646117
US EPA ID# CAT 000646117

Facility Contact

Mr. Vince Bartleman
Title: Regional Field Manager
(310) 792-9451

4.1.2 Waste Fate

The waste will be landfilled directly into the appropriate cells, unless it is subject to land-ban regulation, in which case the waste will be treated to the applicable treatment standard prior to landfill. The need for pretreatment will be determined prior to shipment by submitting representative samples of the excavated soil to the landfill for treatability determination. Should pretreatment be necessary, it will be performed at the disposal facility.

4.2 DESTINATION OF WASTE FROM BUILDING T029

It is anticipated that all debris from the Building T029 demolition will be decontaminated sufficiently to meet non-hazardous waste classification criteria. All Building T029 materials and debris are expected to be disposed of at the Chemical Waste Management Kettleman Hills Facility. The shipment of all T029 demolition debris and materials to the Kettleman Hills

facility is in accordance with California State directives regarding the management of Decommissioned wastes, which requires certain wastes from locations with former radiological usage to be sent to a Class 1 disposal facility.

4.3 RESPONSIBILITIES DURING TRANSPORTATION

During transportation several responsibilities are required by the generator of the waste, the transporter of the waste, and by the facility accepting the waste. The following sections describe the responsibilities for each party.

4.3.1 Responsibilities of Waste Generator

The responsibilities of the waste generator (The Boeing Company) include but are not limited to:

- Ensuring the waste transporter has correct licenses
- Characterizing the waste to be disposed of
- Properly labeling the containers the waste will be shipped in
- Generating the manifest and shipment papers
- Signing the manifest
- Providing the waste transporter with emergency response guidelines that includes an emergency contact list, waste profile, manifests, facility acceptance times and approval letters and transportation route to the disposal facility
- Requesting a certificate of disposal from the facility where the waste was disposed of

4.3.2 Responsibilities of Waste Transporter

The responsibilities of the waste transporter include but are not limited to:

- Ensuring that the following shipping papers accompany the waste at all times, except when requested during inspection:

- Manifests
- Land disposal restrictions
- Emergency response guidelines
- Transportation route map
- Waste profile
- Facility acceptance time/approval letter
- Ensuring the waste is secure and covered in the vehicle
- Ensuring the waste is delivered to the specified disposal facility

4.3.3 Responsibilities of Disposal Facility

The responsibilities of the disposal facility (varies depending on type of waste) include but are not limited to:

- Securing proper profile for hazardous waste and secure permits to dispose at the landfill
- Coordinating trucking and unloading at the landfill
- Providing waste generator with certificate of disposal

4.4 TRANSPORTATION CONTINGENCY

Before leaving the site, the driver will be given a manifest and instructions for reaching the project transportation manager. Should screening by the facility identify the presence of conditions in a load that preclude its acceptance, the driver shall contact the transportation manager or his/her designee. The following procedures will then be followed:

- Suspend truck loading and export operations at the HWMF, pending investigation into the condition and corrective action to preclude recurrence.
- If the condition identified is compatible with the haul vehicle licenses and certifications, the load will either be redirected to another compatible facility, or will be returned to Boeing SSFL via the same routing. This determination will be made by the Project Manager in consultation with the Boeing representative.
- If the condition identified is incompatible with the haul vehicles licenses and certifications (i.e., hazardous material in a trailer not rated to haul this material), the

transporter and Boeing may dispatch a team to the landfill site with appropriately rated haul vehicles. The load will be transferred, and the original truck cleaned prior to release. The load will then be re-manifested and shipped to an appropriate facility.

4.5 DESTINATION OF DEMOLITION WASTE

The waste generated from demolition activities, including decontamination activities, will be sampled and categorized as described in Section 3. All demolition wastes, both hazardous and non-hazardous, generated at Building T133 will be hauled to and disposed of at the Chemical Waste Management, Inc. Kettleman Hills Facility following the steps described in Section 4.3.

Waste waters generated from the decontamination of Building T133 is expected to be disposed of at the facility identified below:

| | |
|-------------------|--|
| <u>Wastewater</u> | Chem Tech 3650 East 26 th Street Los Angeles, CA 90023 Tel: (323) 268-5056 |
|-------------------|--|

5.0 TRANSPORTATION MODE

5.1.1 Transportation Mode

The contaminated soil originating from the T133 and T029 areas will be hauled by trucks, certified for hazardous waste as required, from the site to the Kettleman Hills Facility. All waste from the T029 area will be hauled by trucks from the site to the Nevada Test Site.

5.1.2 Vehicle & Container Description & Capacity

Resource Conservation and Recovery Act (RCRA) or California-hazardous wastes will be transported in closed-top roll-off bins, each with a capacity of 20 to 25 tons. The wastewater will be transported by a vacuum truck. If the wastewater was placed in drums, the drums will be transported in a covered truck.

5.1.3 Special Features

Each truck box will be covered and secured with a tarp prior to leaving the site.

5.1.4 Transporter Registration

The transporter involved with moving the wastes on public routes will have the appropriate authorization for the transportation of hazardous waste and non-hazardous wastes.

It is expected that J. Torres Co. will be utilized for transporting hazardous and non-hazardous soil waste. J. Torres' EPA identification number is CAD980887046. The demolition debris and wastewater are also expected to be transported by J. Torres Co.

6.0 ROUTES

6.1.1 Site's Regulatory Status

The HWMF is a RCRA Part B permitted facility, and is undergoing closure activities.

6.1.2 Primary Route

The primary truck route to the various facilities will be based on reaching the Ronald Reagan 118 Freeway (118 Fwy). To exit the SSFL site from Building T029 or Building T133, take the Area I road to the site gate. Figure T-3 shows the transportation route inside the SSFL.

Primary Route to the 118 Freeway

Beginning at the Site's gate, right on Woolsey Canyon Road (easterly direction), right on Valley Circle Boulevard (southerly direction), left on Roscoe Boulevard (westerly direction), left on Topanga Canyon Boulevard (northerly direction). The entrance to the 118 Fwy is on Topanga Canyon Boulevard. This route is shown on Figure T-4.

Route to Chem Tech

East on 118 Fwy, South on Golden State Freeway 5 (5 Fwy), Euclid Avenue Exit, right on Euclid Avenue, left on 8th Street, right on South Grande Vista Avenue, stay straight to go onto South Downey Road, right on east 26th Street. The facility is located at 3650 East 26th Street, Los Angeles, California. This route is depicted on Figure T-5.

Route to Chemical Waste Management – Kettleman Hills Facility

East on 118 Fwy, north on San Diego Freeway 405, north on 5 Fwy to Kettleman Hills, then south on Skyline Boulevard, and finally left on Old Skyline Road. The landfill is located at 35351 Old Skyline Road, Kettleman Hills. This route is depicted on Figure T-6. The route between the site and 118 Fwy will also be used in the event imported fill soil is required for the project.

6.1.3 Rationale

These routes were selected because they are the least restrictive and believed to be the safest by causing the least inconvenience to nearby residents, and utilizing the widest available artery between the site and the receiving facilities. The route is accessible to emergency service organization and traffic control agencies.

6.1.4 Alternate Route

An alternate route between the Site and freeway entrance includes avoiding 118 Fwy, utilizing 101 Fwy and 405 Fwy instead. This alternate route is not recommended because traffic on 101 Fwy is usually heavier than on 118 Fwy. Another alternate route is access to 118 Fwy through De Soto Avenue instead Topanga Canyon Boulevard. This route is further discussed below.

6.1.5 Discussion of Alternate Route

Access to 118 Fwy is recommended through Topanga Canyon Boulevard. An alternate freeway access is through De Soto Avenue. This alternate will cause the truck to be driven more miles on surface roads than it would on the Topanga Canyon Boulevard primary route. De Soto Avenue access should be considered in case of congestion on Topanga Canyon Boulevard due to unforeseen accidents, construction work, etc. Access to 118 Fwy from the west side, through Black Canyon Road, was not considered because of the difficult terrain through which the road was constructed, the width of the road, and the sharp turns that make it unsafe for large trucks.

6.1.6 Transportation Hours

Inquiries were performed with the City and County of Los Angeles regarding trucking restrictions (i.e., truck frequency and hauling hours).

Boeing SSFL has traditionally and voluntarily tried to minimize hauling to and from its site on Woolsey Canyon Road during commute hours. Thus, for this project, Boeing intends to maintain a minimum 10-minute interval between trucks entering and exiting the site. Truck operations during project implementation will be limited to Monday through Friday between 7 a.m. and 7 p.m.

Truck travel over city streets will be limited to off-peak hours of 9 a.m. and 4 p.m. when hauling excavated contaminated soil from the site.

Truck travel to and from off-site borrow sources will be scheduled and controlled to limit nitrogen oxide (NO_x) emissions to a maximum of 350 pounds per day. NO_x calculations will assume peak hours of 7 a.m. to 9 a.m. and 4 p.m. to 7 p.m., peak hour round trip travel time of 3 hours, off-peak hour round trip travel time of 2 hours, vehicle NO_x emission factor of 4.17 pounds per hour.

This plan complies with the Los Angeles Municipal Code Prohibition Against Truck Traffic Through Residential Zones Before 6:30 a.m.

6.1.7 Hazardous Road Conditions

No trucking will be conducted under inclement weather conditions such as heavy rains, bad visibility, high winds, etc. Potential hazards on the road may be encountered in the narrow, steep hill on Woolsey Canyon Road and narrow portions of Valley Circle Drive.

6.1.8 Emergency Response Resources

When the transportation effort involves ten or greater truck trips per day, a traffic coordinator will be stationed at the entrance of 118 Fwy, at Topanga Canyon Boulevard. A second traffic coordinator will be stationed at the intersection of Woolsey Canyon Road and Valley Circle

Boulevard. Both traffic coordinators will be equipped with lightweight vehicles and two-way communication radios to coordinate trucking and respond to emergencies between the site and the freeway entrance. The traffic coordinator will drive the transportation route a minimum of 1 round trip every 2 hours to monitor loaded and empty trucks, between 118 Fwy and the front gate at the SSFL. The coordinator will monitor for debris, hazardous conditions, congestion, and any inconvenience to the residents that could be mitigated. The traffic coordinators will initiate emergency response as needed by communicating with the transportation manager and emergency response dispatcher as detailed in the Contingency Plan (Section 10.0). Additional emergency response resources include the local police, fire department and California Highway Patrol (CHP). A copy of the Transportation Plan and schedule will be provided to them prior to commencing site activities.

6.1.9 Repair Facilities along the Route

Various truck repair facilities are located between the site and 118 Fwy, on Topanga Canyon Boulevard, along the route, and on De Soto Avenue. Truck repair facilities are also available in the following towns and cities along the route to the Chemical Waste Management – Kettleman Hills facility: San Fernando, Sylmar, Santa Clanta, Valencia, Castaic, Gorman, Grapevine, Wheeler Ridge, Button Willow, and Kettleman City. The remaining receiving facility is located within the larger Los Angeles metropolitan area, and numerous truck repair facilities are located throughout the truck route to each facility. Emergencies on the freeways will be handled in accordance with the Contingency Plan (Section 10.0).

6.1.10 Verification of Route Non-Restriction by CHP

The routes specified in this traffic plan are not restricted by the CHP, local ordinance, or road maintenance activities as of the date of preparation of this plan. Should unforeseen future restrictions be imposed on any particular section of the route, this Transportation Plan will be amended by developing an alternate route for the restricted section.

6.1.11 Round Trip Time

The trip time between the Site and the Chemical Waste Management – Kettleman Hills facility is approximately 4 hours; therefore, each truck will be loaded once per day, and no round trip is foreseen on any particular day.

The trip time between the various facilities receiving the non-hazardous demolition debris and the Site varies between approximately 40 minutes to 1.5 hours. Between two and four round trips may be performed by the trucks hauling non-hazardous demolition debris.

6.1.12 Number of Vehicles Per Day

It is expected that an average of 18 trucks per day, over an 8-day duration, will be necessary to remove the approximated 2,000 cubic yards of estimated contaminated soil. Although not anticipated during transportation of the contaminated soil off site, a maximum of 39 trucks per day may enter and leave the site 5 days a week, between the non-peak hours of 9 a.m. and 4 p.m.. This is based on a maximum of six trucks per hour departing the site between the hours of 9 a.m. and 3:30 p.m.

The total of 36 trucks per day will be required for hauling import fill soil to the site. Truck travel to and from off-site borrow sources will be scheduled and controlled to limit NOx emissions to a maximum of 350 pounds per day. NOx calculations will assume peak hours of 7 a.m. to 9 a.m. and 4 p.m. to 7 p.m., peak hour round trip travel time of 3 hours, off-peak hour round trip travel time of 2 hours, and a vehicle NOx emission factor of 4.17 pounds per hour. The Contractor will maintain a daily log of trucks entering and exiting the site and will calculate daily NOx emissions to ensure the 350-pound threshold is not exceeded. A sample calculation follows:

| | | | |
|-----------------------|--------------------------------------|---|-------------------|
| Peak Trucks | 12 at 3 hours x 4.17 pounds per hour | = | 150 pounds |
| Off-Peak Trucks | 24 at 2 hours x 4.17 pounds per hour | = | <u>200 pounds</u> |
| Total Daily Emissions | | = | 350 pounds |

The Contractors Daily Log will be available to DTSC for review.

It has been estimated that up to 20 trucks may be needed for hauling the demolition debris. This estimate is based on visual inspection of the structures and general area. If additional trucks are needed, due to larger volume of demolition debris than currently anticipated, this fact will not constitute a major change to the Transportation Plan and no further approval will be necessary.

6.1.13 Schedule of Truck Operation

Restrictions on the schedule for trucking were discussed in Section 6.1.6, “Transportation Hours.” The time interval between dispatching each truck is approximately 10 minutes, which is the time required to load and sign the manifest for each truck. A minimum 15-minute spacing will be voluntarily used for trucks during peak hours. If it is necessary to import fill from an off-site borrow source, trucks used for hauling imported soil to the site will be operational for approximately 8 hours. The estimated time to complete importing fill soil is 30 days.

7.0 TRAFFIC CONTROL AND LOADING PROCEDURES

7.1.1 Procedure for Entering and Leaving the Site

Procedure for transportation personnel entering the site and leaving the site is described below:

Each truck driver will make a temporary stop at the facility entrance at Woolsey Canyon Road. The driver will park the truck at an area designated by the security guards. The security guard will issue a temporary pass permit to the driver and authorize the truck entry to the facility. The driver will proceed to the loading area following the posted signs. The truck route within the facility will be determined by the Client.

7.1.2 Staging Area

At any time, approximately four to five trucks can be staged at the loading area. No trucks will be staged along the truck route.

Excess trucks (those showing up faster than planned) will be diverted by the traffic controller to De Soto Boulevard, where they will be staged north of 118 Fwy, at the truck staging area. The traffic coordinator will then mobilize the empty trucks towards the facility, as the need arises at the loading area, in coordination with the transportation manager. There will be no staging area required for trucks carrying loads of waste to the disposal facility since those trucks don't need to stop after leaving the facility. For empty trucks headed towards the SSFL, it is planned to dispatch trucks at set intervals to avoid traffic problems along Woolsey Canyon Road, the traffic bottleneck. The interval will be about 15 minutes between trucks when these trucks will traverse City of Los Angeles streets between 7 a.m. to 9 a.m. and 4 p.m. to 7 p.m. For other periods, the interval will be 10 minutes. Although truck drivers will be instructed to approach the site at the prescribed intervals, there is always the possibility that some trucks will approach the site ahead of time. Therefore, it is planned to have those trucks park in an industrial section on De Soto

Boulevard, between Roscoe and 118 Fwy, on available parking space, rather than drive toward the site and create traffic congestion on Woolsey Canyon.

7.1.3 Local Traffic Hazards

The intersection of Valley Circle Drive and Woolsey Canyon Road is an area where local traffic problems can be encountered due to the potential for missing the intersection; therefore, a traffic coordinator will be posted at the intersection at all times during transportation activities.

7.1.4 Lane Closure

There will be no need to perform lane closure; however, traffic control is essential so that the desired interval between successive trucks is maintained.

7.1.5 Noise Restrictions

All trucks used on this project will comply with all California Department of Motor Vehicle noise restrictions. This will require trucks exceeding 35 mph to have a noise level of less than 90 decibels, A-Scale (dBA) and trucks traveling less than 35 mph to have a noise level of less than 86 dBA. Any truck exceeding these requirements will be removed from service. Noise measurements will be taken 50 feet from the centerline of the road on Valley Circle Drive. These measurements will be taken and recorded during the first day of trucking, and periodically thereafter.

7.1.6 Traffic Control Details

In order to avoid staging trucks along the transportation route, a traffic coordinator will be stationed at the entrance of Topanga Canyon Boulevard to 118 Fwy. The traffic coordinator will coordinate the trucking movement between the freeway and the Site by continuous communication via radio with the transportation manager at the loading area. The traffic

coordinator will authorize empty trucks to proceed in such a fashion that no more than five trucks will be staged at the loading area at any time and that an approximate 10-minute interval will be maintained between consecutive trucks. The interval between trucks will be extended to about 15 minutes between the hours of 7 a.m. to 9 a.m. and 4 p.m. to 7 p.m.

7.1.7 City/County Approval

The above plan does not require city or county approval since it involves neither traffic control of normal activities along the route nor lane closure.

7.1.8 Loading Procedure and Weighing Procedure

The loading of the roll-off bins will be performed according to the following procedure. Each roll-off bin will be pre-weighed, using an on-site scale. The roll-off bins may contain demolition debris or excavated soils. The characteristics of the waste would have been determined prior to transportation.

The non-hazardous material may be loaded using a loader (i.e., would not have been placed in roll-off bins). Truck drivers will not stay in the trucks while loading is in progress. Once the loading is complete, the truck driver will pull the truck through the decontamination station. The truck will then move to the weighing area, where the total weight of the truck will be measured, in order to comply with maximum allowable weight limit while driving on public roads.

Over-loaded trucks will be driven back to the loading area for removal of excess weight, and the decontamination process, if needed, and weighing will be repeated.

7.1.9 Manifest

The characteristics of the waste would have been determined prior to transportation. If the waste is categorized as a hazardous waste, a manifest of hazardous waste will be prepared, for each

roll-off bin, based on analytical data and landfill approval profile sheet. After loading the roll-off, the truck driver will be handed the manifest for signature. The generator's copy (yellow) and the DTSC's copy (blue) will be removed from the manifest package, by the transportation manager, for logging and tracking purposes. The balance of the manifest sheets will be handed over to the driver to accompany the shipment of the waste to the landfill facility.

If the waste is characterized as non-hazardous waste, the truck driver will be handed a non-hazardous waste manifest or bill of lading. The truck driver will sign the non-hazardous waste manifest or bill of lading. A generator's copy will be retained by the transportation manager for logging and tracking purposes.

7.1.10 Dust Suppression

Loading of bins will be performed at the staging area of the roll-off bins, within the T133 area or T029 area, depending on location of waste generation. Highway trucks can approach along the access road for each building. These trucks will be decontaminated to avoid spreading dust or small amounts of soil.

Non-hazardous waste that was not placed in bins will be loaded at the T133 or T029 area (depending on waste generation location). The side of the truck will be draped with plastic to avoid contamination of the sides of the truck and the truck tires. Gentle loading will be performed, and spraying with water will suppress any potential dust generated during the loading process. Care will be taken to apply dust suppression water to the top of the load or source material in the loader to avoid welling the truck tires. Material spilled during loading will be collected. These trucks will then go through the decontamination station prior to weighing and departure from the site.

The generated wastewater collected in drums, will be loaded into a closed-type truck with mounted lift. The drums will be secured. These trucks will be decontaminated to avoid spreading

dust. The wastewater collected in an aboveground tank will be transferred to a vacuum truck. The vacuum truck will park in proximity of the aboveground tank. The hose from the vacuum truck will be lowered into the aboveground tank and the pump truck's pump turned on. After transfer of the wastewater, the pump will be turned off and the vacuum truck will then go through the decontamination station prior departure from the site.

7.1.11 Truck Decontamination

Highway trucks picking up bins will be decontaminated prior to leaving the site to avoid spreading dust or small amounts of soil. Highway trucks entering the exclusion zone (EZ) to be loaded with non-hazardous waste will then proceed through the decontamination station. It is not expected that there will be a need for washing the truck tires with water; rather dry decontamination by brushing and brooming is planned. Should rain occur during the work, mud may form at the loading zone, in which case work will be temporarily suspended until either weather conditions become favorable or the decontamination station is expanded to handle wet decontamination of numerous trucks.

7.1.12 Environmental Monitoring

Environmental monitoring, including monitoring for dust and VOC monitoring, will be performed during loading activities for precautionary purposes.

7.1.13 Noise Emissions

California Vehicle Code Section 23130 restricts noise levels from trucks to 90 dbA at speeds greater than 35 mph and 86 dBA at speeds of 35 mph and lower. The measurement is to be taken 50 feet from the center of the lane of travel. Each day, the first several trucks will be checked for compliance with this regulation. Spot checks will be done thereafter. Trucks found not to be compliant will be removed from service until the problem is fixed.

7.1.14 Container Cover

All hauled material will be covered prior to transportation. Roll-off bins will be equipped with fixed covers. End dump truck boxes will be covered with tarpaulins.

7.1.15 Truck Inspection

All trucks will be inspected by the transportation manager before leaving the site. The inspection will include visual checking of tire conditions, brake pads, latches, proper covering, placarding, and hauling documents (manifests).

7.1.16 Inspection Record

The inspection results will be logged in the daily construction logs kept by the transportation manager.

7.1.17 Spill/Release Control

Gentle loading will be performed to minimize the potential for spill or dust creation. Water spraying will be implemented as needed to suppress potential dust while loading. No loading will be performed during unfavorable weather condition (high winds or storms).

8.0 RECORD KEEPING

8.1.1 Field Record

A daily log will be maintained, by the transportation manager, in which the following information is recorded for each load:

- Date of loading
- Time of loading
- Vehicle identification
- Truck driver name
- Trucking company
- Approximate weight of the load
- Comments or remarks
- Handling of the hazardous waste manifest
- Type of container used for the waste
- Type of waste in container/contents of load
- Destination
- Time of departure
- Quantity of waste
- Instruction to truck drivers on record-keeping
- Handling of hazardous waste manifest (signature, distribution of copies and handling)
- Handling of Transportation Plan
- Handling of driving certificate, maintenance log and vehicle permits.

8.1.2 Manifest Distribution

Additionally, a hazardous waste manifest, non-hazardous waste manifest or bill of lading will be generated for each load to accompany the load to the receiving facility. The document will be signed by both the generator's representative and the truck driver. For non-hazardous waste loads, a copy of the non-hazardous waste manifest or bill of lading will be retained by the transportation manager.

For hazardous waste manifests, the generator's copies of the manifest will be retained by the transportation manager in the project folder for reconciliation with the manifests from the Treatment, Storage and Disposal Facility (TSDF) upon receipt of the waste. The generator's blue copy of the hazardous manifest will be sent to DTSC within 30 days, in accordance with the law.

8.1.3 Driver's Record

The hazardous waste manifest, or the non-hazardous waste manifest or the bill of lading for each shipment of non-hazardous waste, will be kept by the driver in the appropriate document pocket located in the driver's door. For hazardous waste manifest, the driver will be responsible for handing over the manifest or the bill of lading to the TSDF, at the TSDF's gate, for signature and processing by the TSDF. The TSDF will send the white copy of the hazardous waste manifest to the DTSC and the yellow copy to the generator, within 30 days. Then, both the DTSC and the generator will be able to perform reconciliation of the manifests.

For non-hazardous waste, the receiving facility will sign the non-hazardous waste manifest or bill of lading, and send a copy to the generator for reconciliation purposes.

8.1.4 Plan Distribution

Each truck driver will be given a copy of this Transportation Plan, which includes complete instructions describing the route to be traveled and special instructions for emergency procedures and contacts (Section 10.0 of this plan). A copy of the Health and Safety Plan, bill of lading, analytical results, hazardous waste manifest and maps will also be included in the document. The Transportation Plan along with the other documentation shall be kept by the truck driver in the cab of the truck with the driver.

9.0 HEALTH AND SAFETY

9.1.1 Plan Identification

A comprehensive Health and Safety Plan has been prepared for the Closure of the HWMF.

9.1.2 Training Procedure and Health and Safety Plan Distribution

The Health and Safety Plan will be used for training purposes prior to the start of the project. Each truck driver will be given a copy of the Health and Safety Plan as an integral part of this Transportation Plan. Prior to project startup, the transportation manager will hold a health and safety meeting with all vehicle operators to thoroughly communicate the Transportation and the Health and Safety Plan to the vehicle operators. Each vehicle operator will acknowledge his understanding of the plans by signing the attendance sheet. New truck drivers assigned to haul hazardous waste will go through the same procedures prior to being authorized to commence the work.

- Truck drivers hauling hazardous waste will have Health and Safety training in accordance with 29 Code of Federal Regulations (CFR) 191 0.120 and CFR Title 8 Section 5192. The drivers will be protected per modified level D and each will have a dust respirator to upgrade to level C if needed.
- Truck drivers are permitted to cover their trucks after completion of loading prior to leaving the site.
- On-site personnel will not be allowed near loading area to avoid unnecessary exposure to airborne dust and/or physical risks associated with movement of heavy equipment (loaders, etc.). The loader driver will be in an enclosed-cabin loader equipped with air filter to minimize his exposure to airborne particles.

9.1.3 Specific Instructions

In addition to the Task Specific Health and Safety Plan described above, the following additional procedures and requirements are applicable to the truck drivers:

- The truck driver shall leave the cab after staging the truck at the loading area prior to commencing the loading. The driver will observe the loading while standing outside the EZ, upstream of any prevailing wind direction.
- Upon completion of loading, the driver will pull the truck to the decontamination area if the waste is suspected to be non-hazardous. This is where he will also leave the truck to perform truck taming and final visual checking of the truck prior to signing the manifest and leaving the site. For potentially hazardous waste, the containerized material will be loaded on trucks outside the EZ, then pass through the decontamination area.
- After leaving the facility with a full load of waste and proper shipping documents (manifest or bill of lading), the driver must tend to the vehicle at all times by tagging within 100 feet of the vehicle and having it within unobstructed view. The shipping documents and a copy of the Transportation Plan must be left on the driver's door.

Areas where the truck driver is not permitted to enter:

- Inside the facility
- The hot zone
- Areas outside of the prescribed route
- Outside the facility
- Areas outside of the transportation route

9.1.4 Transportation Coordination

Subject to change, the health and safety coordinator for the Transportation Plan is expected to be:

Mr. Gary Runnells
American Integrated Services, Inc.
Telephone: Work (323) 249-8442 Cell Phone (562) 714-9291
Pager (323) 288-6500

Alternate:
Mr. John Ping
American Integrated Services, Inc.
Telephone: Work (323) 249-8442 Cell Phone (323) 493-0030
Pager (323) 288-6502

9.1.5 Communications

Communications will be achieved by cell phone or wireless radio. The on-site transportation coordinator, the road traffic coordinators, and each truck driver will be provided with wireless communication gear that will enable them to communicate during the implementation of the plan and to coordinate emergency response in accordance with the Contingency Plan (Section 10.0).

Transportation Coordinator (subject to change): Mr. Gary Runnells

Primary Responsibilities:

- Field implementation of the Transportation Plan
- Coordination with receiving facility, trucking company, (QA)2 Environmental field supervision, and excavation and loading subcontractor (also performed by AIS).
- Management of the Traffic Coordinator

10.0 CONTINGENCY PLAN

10.1.1 Plan Distribution

The Contingency Plan addresses the response for accidental off-site releases. Each driver will carry a copy of the Contingency Plan and will be made aware of its contents so that he can take the necessary steps to implement the tasks assigned to him and communicate the plan to the emergency service organization, law enforcement agencies, and transportation authorities that have jurisdiction along the proposed route.

10.1.2 Description of Contaminants

The contaminant matrix is soil or demolition debris contaminated with low level (parts per million) of one or more of the following chemicals. These are based on knowledge of processes and material used or generated at the HWMF:

- High pH
- Metals
- Total Petroleum Hydrocarbon

Other chemicals are suspected and would be tested for. A list of COCs at the HWMF is provided in Attachment A.

10.1.3 Hazard Analysis

The main concern regarding accidental release during transportation is human exposure, which includes chemical and physical hazards.

Chemical Hazards

- The main hazard is human exposure through ingestion and inhalation. Therefore, denying unauthorized personnel access to the spill area is the first and most important step.

- A secondary hazard is impact on the environment. Such risk is considered very low, since a spill will most likely occur on a public road, where the likelihood of impacting the subsurface soil, surface water, or groundwater is insignificant. The risk from airborne contaminants is greatly diminished by having the waste already moist when it is loaded and covered during transportation. Should a spill happen during transportation, potential airborne contaminants will be further minimized by controlling the spilled area.

Physical Hazard

- This hazard depends on the amount of the spilled soil or debris. A large spill on a public road would require lane closure and could pose a significant risk to motorists. The driver will make mandatory notifications described in the Transportation Plan so that highway patrol police and local agency personnel can help in performing lane closure and securing the perimeter of the spilled area.
- In the event of a small spill, the driver will use hand tools such as brooms, pan and shovel to return the waste to the bin or truck.

10.1.4 Method of Containment of Accidental Release

Training and equipment the drivers will have so that they can implement the provisions of the Contingency Plan are as follows:

- Each driver will be provided with a copy of the Transportation Plan, which includes a list of emergency contacts.
- Pre-construction training on the contents of the Transportation Plan, including the Contingency Plan, will be conducted for all drivers.
- Each driver will be carrying a wireless communication device.
- Each driver will carry small cleanup accessories, traffic cones, signs, caution tape and personal protective equipment.

10.1.5 Mandatory Notifications

In case of hazardous waste release during transportation, the following shall be contacted by the driver:

| | |
|----------------|--|
| 911 | if release originates on the highway |
| (800) 852-7550 | if release originates off highway (State Office of Emergency Services) |
| 911 | Local Fire Department |
| (415) 974-8132 | EPA Regional Emergency Response Office, Region 9 |

10.1.6 Spill Response Plan

In case of a spill on the road, the truck driver is to immediately (1) isolate and deny entry to the spilled area, (2) make mandatory notifications described above so CHP and local agency personnel can help secure the perimeters of the spilled area, and (3) perform necessary lane closure. The driver shall then call the on-duty transportation manager to arrange for the mobilization of necessary cleanup efforts. The procedure for isolating the spill area is as follows:

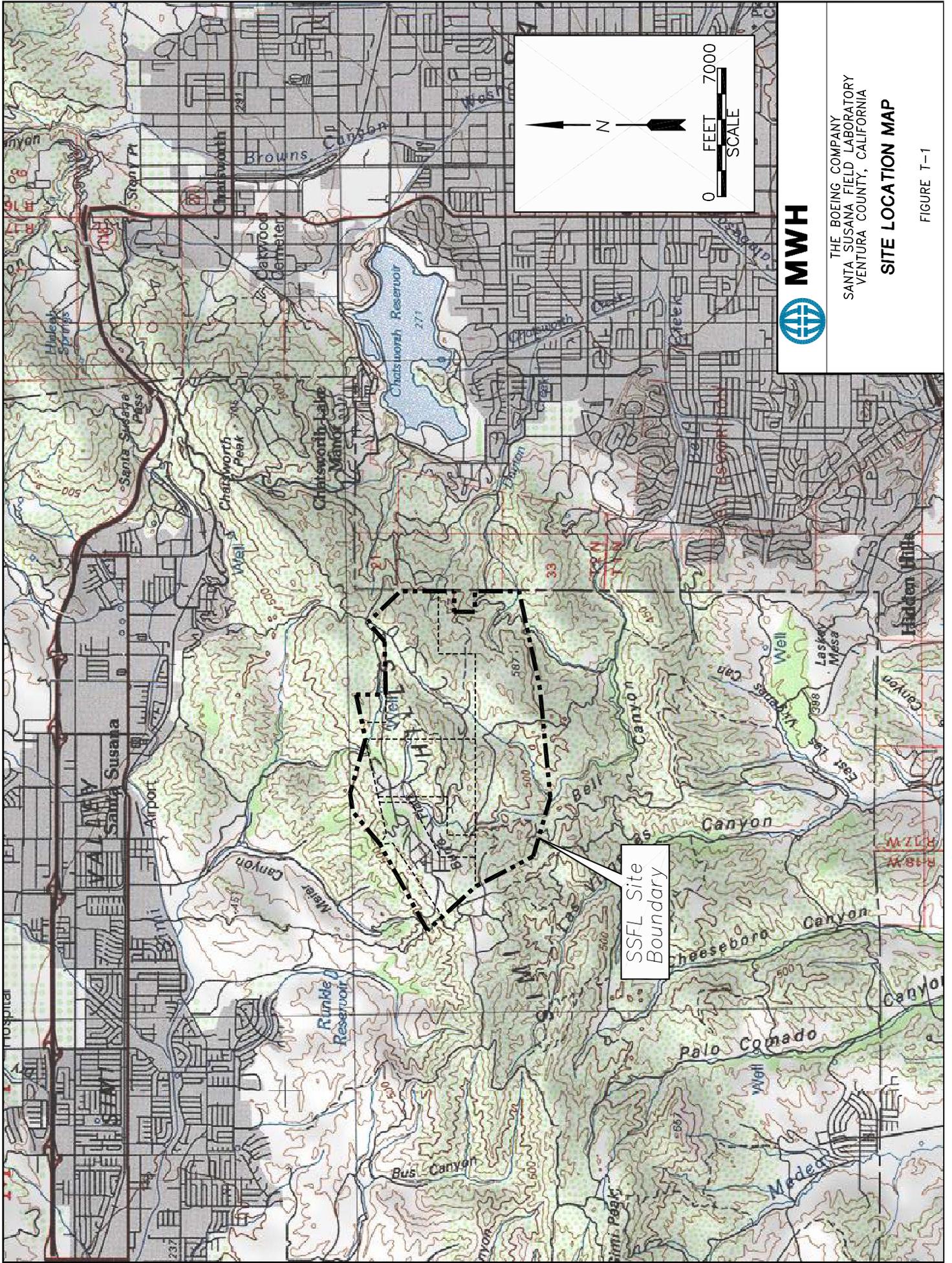
1. Isolate spill area by placing traffic cones around it.
2. Call local emergency response authorities to help secure the spill area and deny access to unauthorized persons.
3. Call Transportation Coordinator to dispatch necessary equipment (loader and an empty truck with emergency crew) to clean the spill.
4. Dispatch a water truck in order to suppress any dust formed during the spill.
5. In the event of a small spill, the driver will use hand tools such as brooms, pan and shovel to return the waste to the bin or truck.

10.1.7 Cleanup Plan

For a major truck spill, the transportation manager will dispatch a loader, an empty truck with an empty roll-off bin, and necessary operators to containerize the spilled soil, then broom clean and vacuum clean the footprint of the spilled surfaces.

10.1.8 Driver Training Plan

Each driver will be trained in Emergency Response, in accordance with the Emergency Response/Incident Control Manual and prepared by Environmental Training and Compliance for Hazardous Material and Waste Transportation training course, in accordance with 49 CFR, Part 172-704 (a),(1),(2),(3), Subpart H.



MWH

THE BOEING COMPANY
 SANTA SUSANA FIELD LABORATORY
 VENTURA COUNTY, CALIFORNIA

SITE LOCATION MAP

FIGURE T-1

Boeing / Santa Susana Field Laboratory



SANTA SUSANA FIELD LABORATORY LOCATION OF T133 AND T029

Legend

Notes:

Base Map Legend

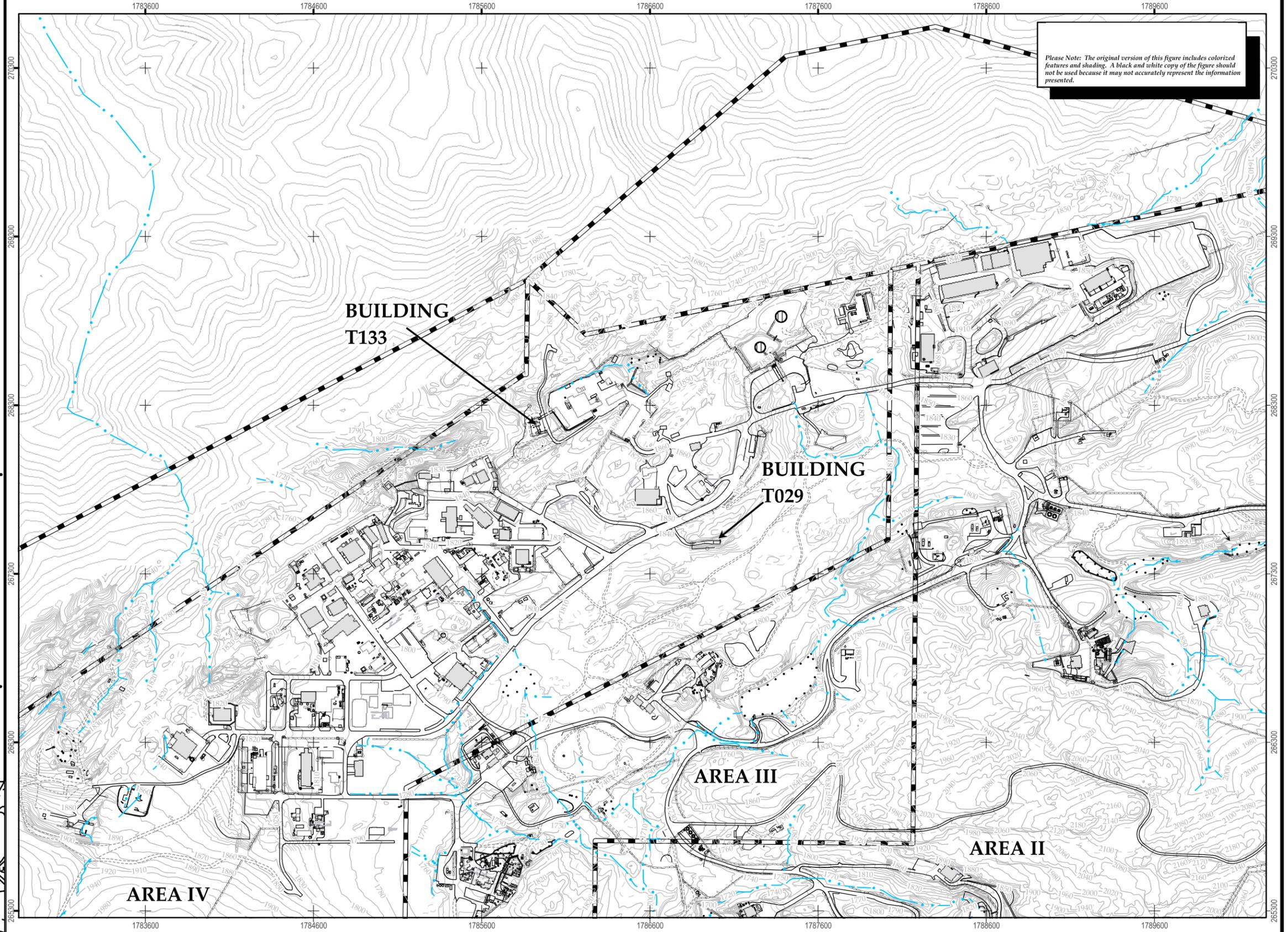
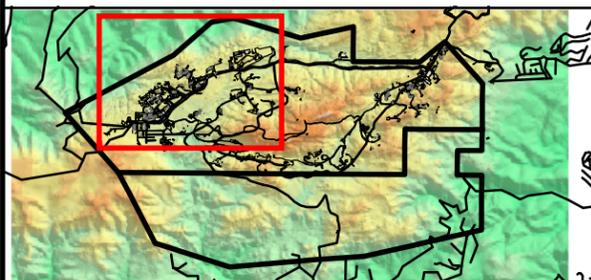
| | | | |
|--|--|--|-----------------------------------|
| | Existing Building or Structure | | Ground Elevation Contours |
| | Removed Building or Structure | | A/C Curbing |
| | Other Tanks, R Indicates Removed | | Dirt Road |
| | Solvent Tanks, R Indicates Removed | | Ponds |
| | Petroleum Fuel/Oil Tanks, R Indicates Removed | | Possible Ponds (approx. location) |
| | Hydrazine (MMH, UDMH, HZ) Tanks, R Indicates Removed | | Fences |
| | Awnings | | Pipes |
| | Administrative Area Boundary | | Creeks |
| | | | Rocks Outcrops |
| | | | Leachfield |
| | | | Drainage Pipe |

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Date: 4/04/03



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FEET



Boeing / Santa Susana Field Laboratory



TRANSPORTATION ROUTE DETAIL INSIDE SANTA SUSANA FIELD LABORATORY

Legend

- Route from Building T133 and T029 to the gate entrance

Notes:

Base Map Legend

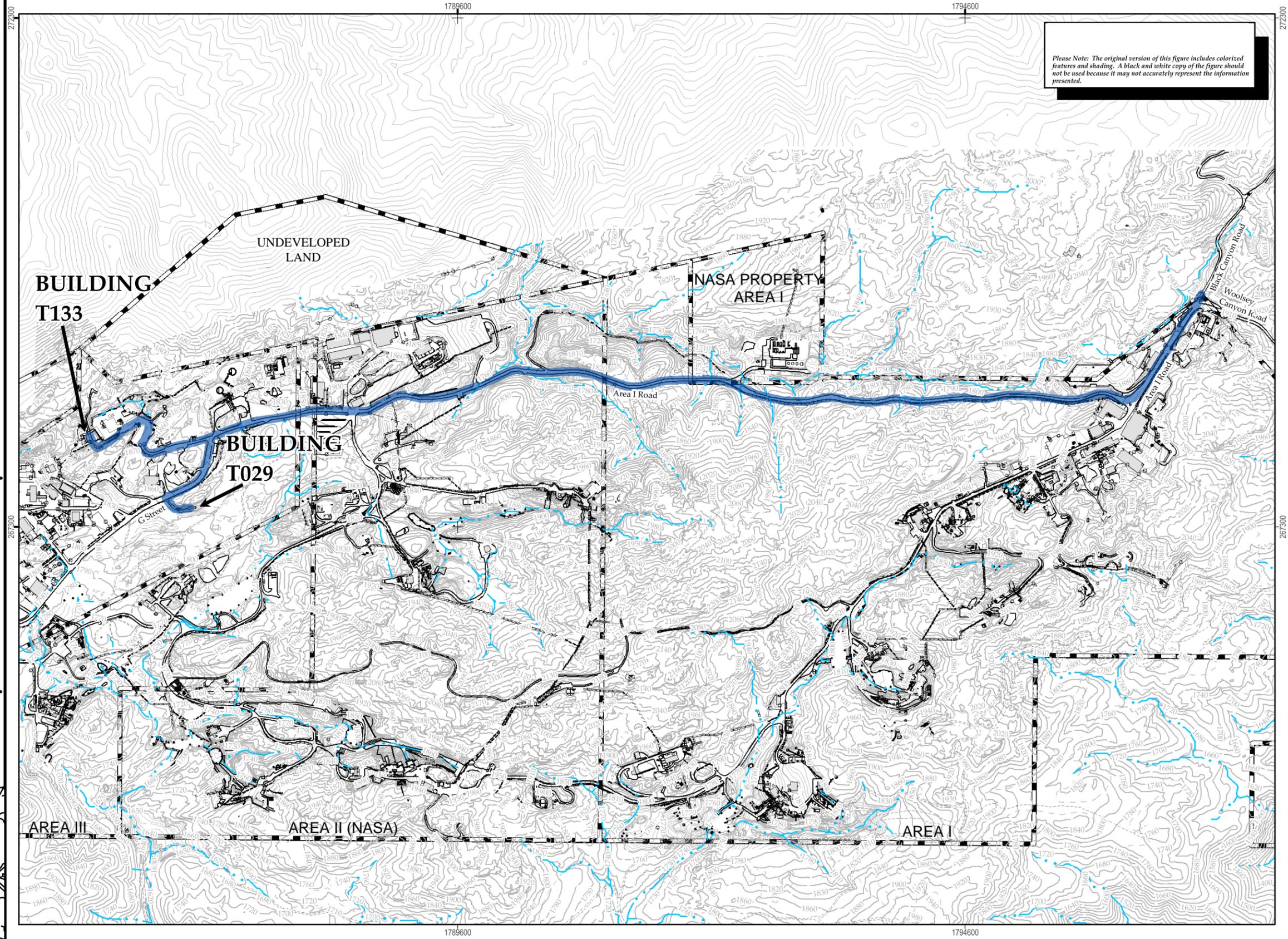
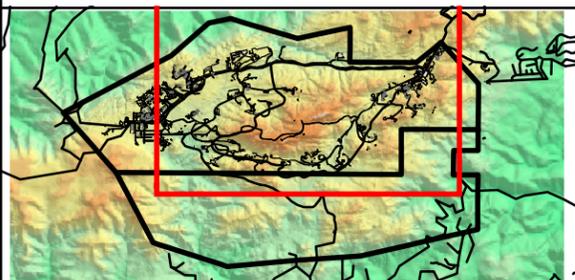
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|--|--|--|-----------------------------------|
| | Existing Building or Structure | | Ground Elevation Contours |
| | Removed Building or Structure | | A/C Curbing |
| | Other Tanks, R Indicates Removed | | Dirt Road |
| | Solvent Tanks, R Indicates Removed | | Ponds |
| | Petroleum Fuel/Oil Tanks, R Indicates Removed | | Possible Ponds (approx. location) |
| | Hydrazine (MMH, UDMH, HZ) Tanks, R Indicates Removed | | Fences |
| | Awnings | | Pipes |
| | Administrative Area Boundary | | Creeks |
| | | | Rocks Outcrops |
| | | | Leachfield |
| | | | Drainage Pipe |

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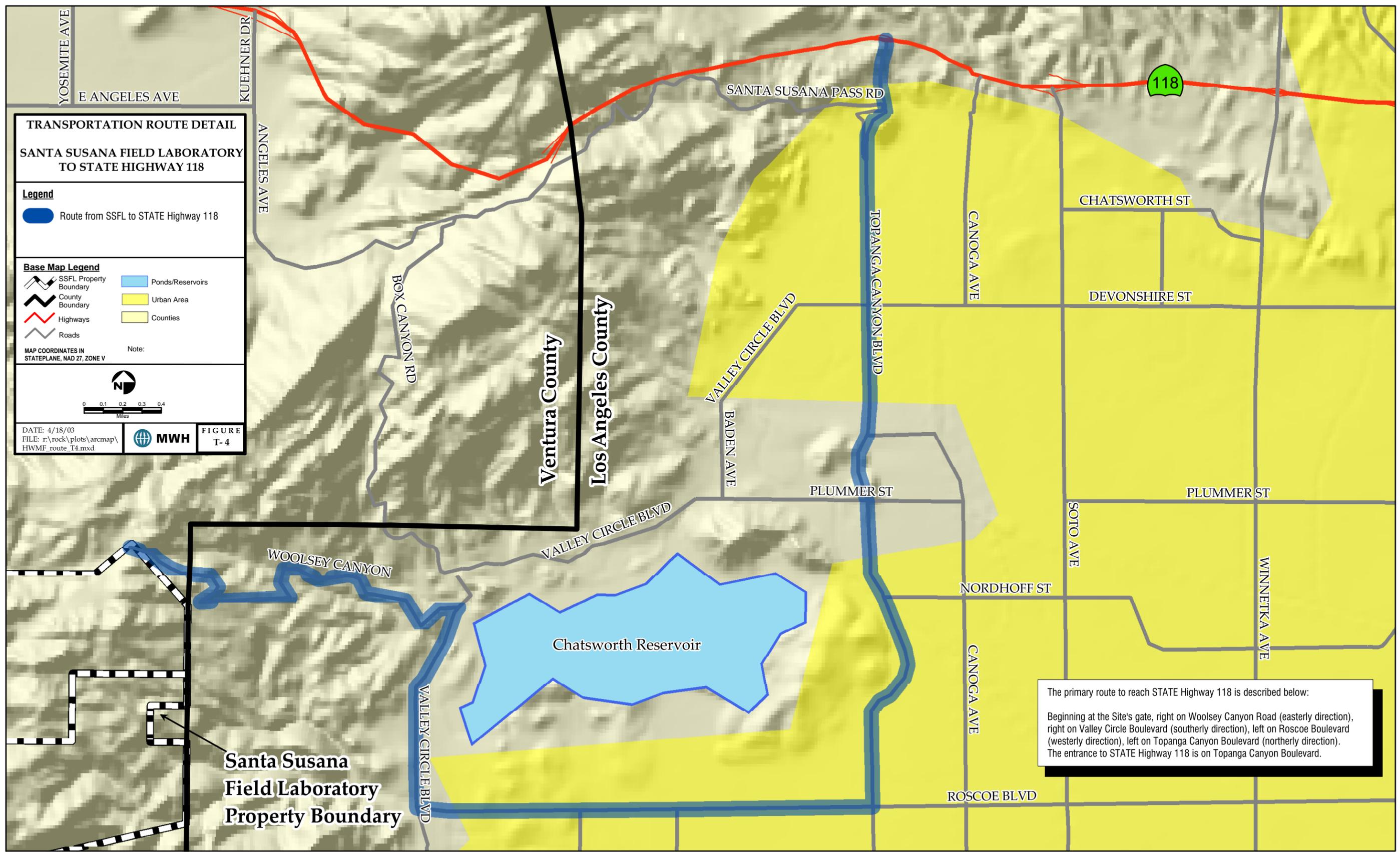
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Please Note: The original version of this figure includes colored features and shading. A black and white copy of the figure should not be used because it may not accurately represent the information presented.



TRANSPORTATION ROUTE DETAIL
SANTA SUSANA FIELD LABORATORY
TO STATE HIGHWAY 118

Legend
 Route from SSFL to STATE Highway 118

Base Map Legend

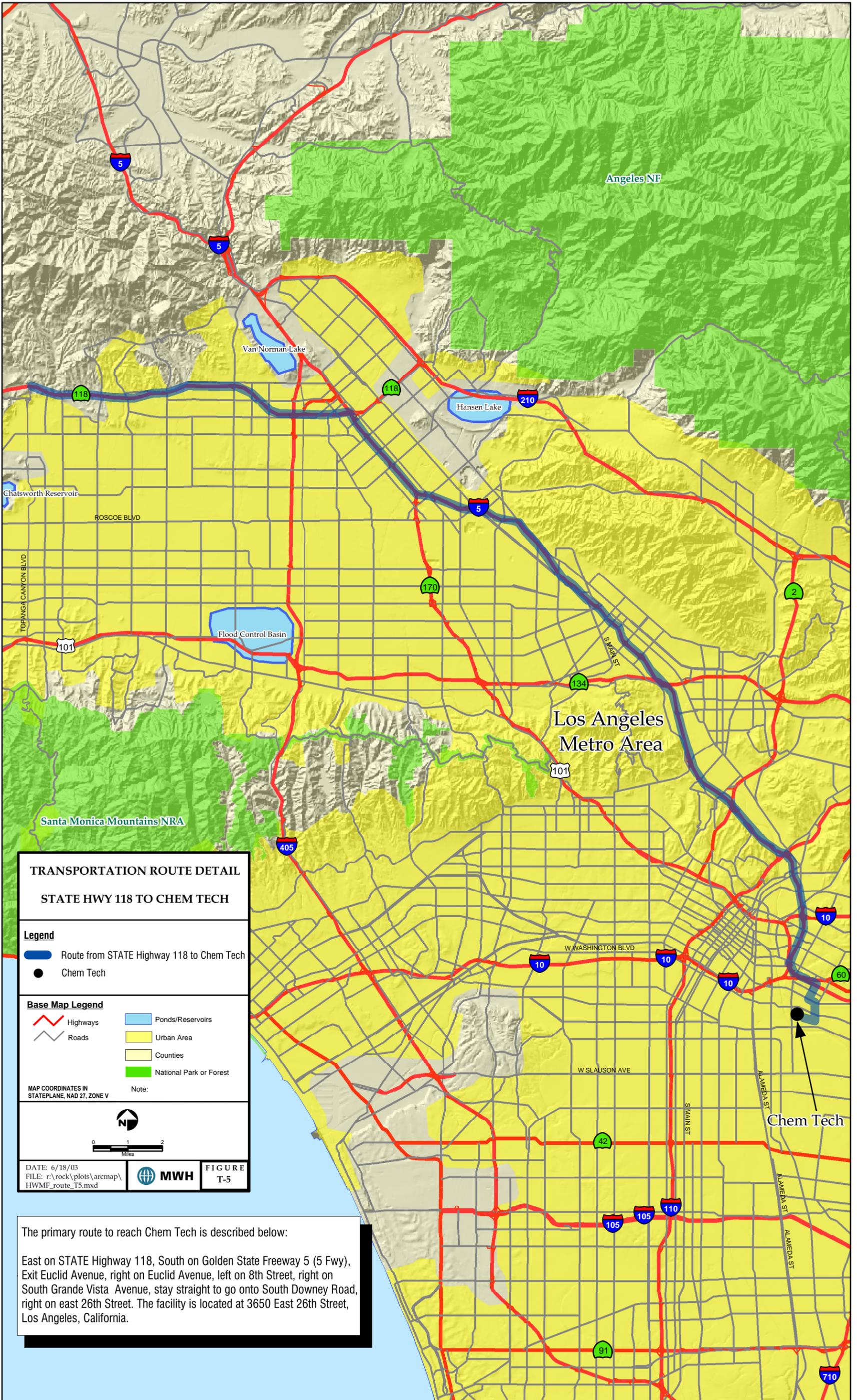
| | |
|------------------------|------------------|
| SSFL Property Boundary | Ponds/Reservoirs |
| County Boundary | Urban Area |
| Highways | Counties |
| Roads | |

MAP COORDINATES IN STATEPLANE, NAD 27, ZONE V Note:

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MWH **FIGURE T-4**

The primary route to reach STATE Highway 118 is described below:
 Beginning at the Site's gate, right on Woolsey Canyon Road (easterly direction), right on Valley Circle Boulevard (southerly direction), left on Roscoe Boulevard (westerly direction), left on Topanga Canyon Boulevard (northerly direction). The entrance to STATE Highway 118 is on Topanga Canyon Boulevard.



TRANSPORTATION ROUTE DETAIL
STATE HWY 118 TO CHEM TECH

- Legend**
- Route from STATE Highway 118 to Chem Tech
 - Chem Tech

- Base Map Legend**
- | | |
|----------|-------------------------|
| Highways | Ponds/Reservoirs |
| Roads | Urban Area |
| | Counties |
| | National Park or Forest |

MAP COORDINATES IN STATEPLANE, NAD 27, ZONE V

Note:

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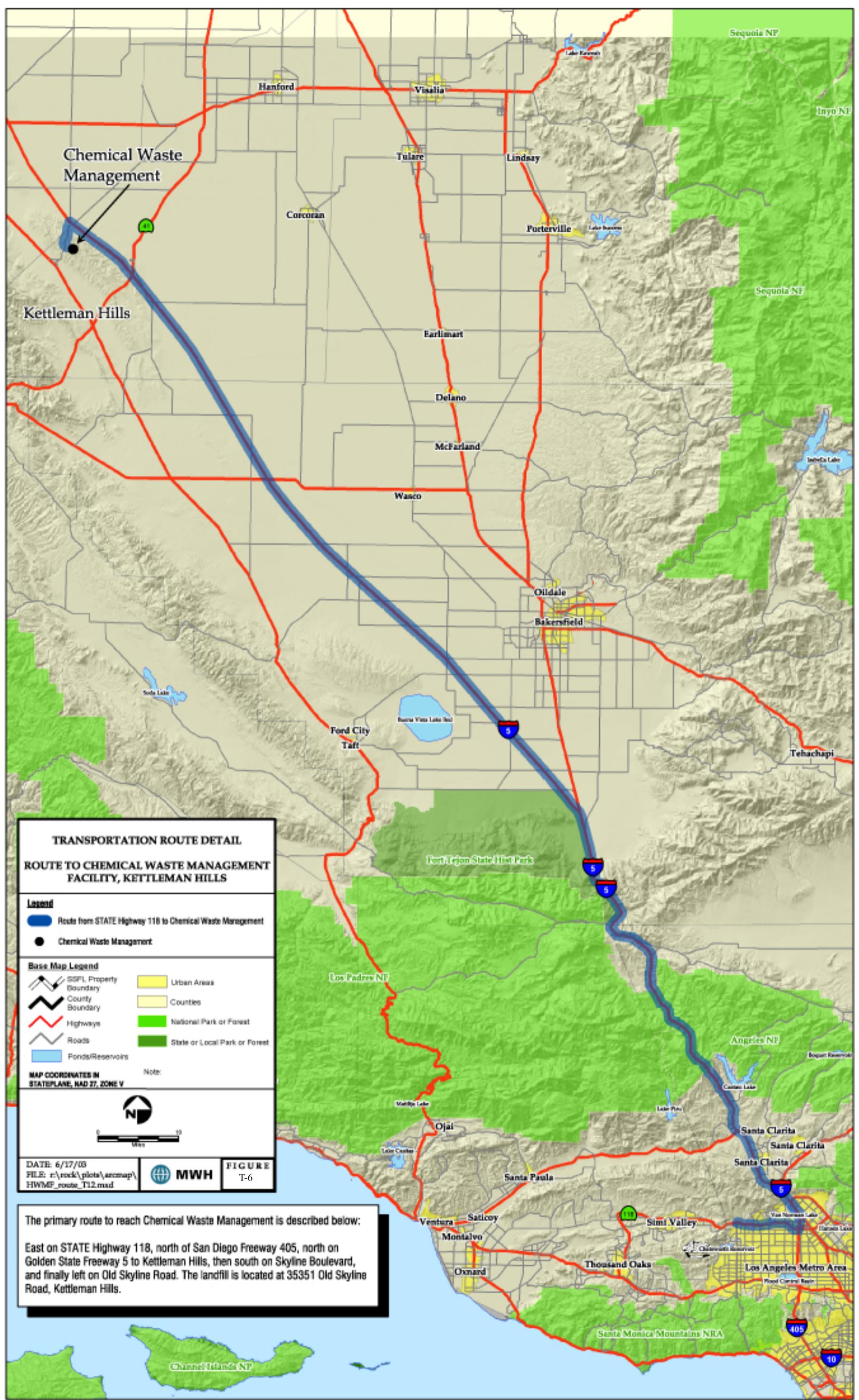
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MWH **FIGURE T-5**

The primary route to reach Chem Tech is described below:

East on STATE Highway 118, South on Golden State Freeway 5 (5 Fwy), Exit Euclid Avenue, right on Euclid Avenue, left on 8th Street, right on South Grande Vista Avenue, stay straight to go onto South Downey Road, right on east 26th Street. The facility is located at 3650 East 26th Street, Los Angeles, California.



TRANSPORTATION ROUTE DETAIL
ROUTE TO CHEMICAL WASTE MANAGEMENT FACILITY, KETTLEMAN HILLS

- Legend**
- Route from STATE Highway 118 to Chemical Waste Management
 - Chemical Waste Management

- Base Map Legend**
- | | |
|-------------------------|-------------------------------|
| SDFPL Property Boundary | Urban Areas |
| County Boundary | Counties |
| Highways | National Park or Forest |
| Roads | State or Local Park or Forest |
| Ponds/Reservoirs | |

MAP COORDINATES IN STATEPLANE, NAD 27, ZONE V



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FIGURE T-6

The primary route to reach Chemical Waste Management is described below:
 East on STATE Highway 118, north of San Diego Freeway 405, north on Golden State Freeway 5 to Kettleman Hills, then south on Skyline Boulevard, and finally left on Old Skyline Road. The landfill is located at 35351 Old Skyline Road, Kettleman Hills.