

**Action Items Required by the April 2, 2025 DTSC Imminent and Substantial Endangerment
Determination and Order (chart modified on July 1, 2025)**

Order ¶	Key Action	Start Date/Deadline	Status
5.1.3	Meet with DTSC to discuss response strategy.	April 9, 2025	Completed 4/8/25
6.1	Submit the name, address, and telephone number of a Project Coordinator.	April 9, 2025	Completed 4/9/25
6.2	Submit the name, address, and resume of the project engineer or geologist chosen, and the statement of qualifications of the consulting firm responsible for the work.	April 9, 2025	Completed 4/9/25
7	Provide written notice stating whether Respondents will comply with the Order's terms.	April 9, 2025	Completed 4/9/25
6.25	Provide a copy of the Order to all contractors, subcontractors, laboratories, and consultants retained to conduct work performed under the Order within 15 days of the Order's Effective Date or the date of retaining services, whichever is later. Condition such contracts upon satisfactory compliance with this Order.	April 17, 2025	Completed 4/17/25; ongoing as needed
6.3	Submit a Monthly Summary Report of activities conducted under the Order.	May 2, 2025 (on the 15th of every month thereafter)	Ongoing
5.1.2(a); 5.3	Submit a draft removal action workplan (RAW) for extension of covered area.	May 2, 2025 May 16, 2025 (extension granted 4/26/25)	Completed 5/16/25
5.1.2(b); 5.3	Submit a draft RAW for interim relocation and stabilization of containerized waste.	May 2, 2025 May 9, 2025 (extension granted 4/26/25)	Completed 5/9/25
5.1.2(c); 5.3	Submit a draft RAW for protection of cell 8A from intrusion of SET event.	July 1, 2025	Completed 7/1/25
5.4	If DTSC provides comments on draft RAW, submit a revised draft RAW for DTSC review and approval. Submit an addendum before modifying any DTSC-approved RAW.	Within 15 days of receiving comments on RAWs	
5.4	Submit an implementation report documenting the implementation of the final RAW.	Within 30 days of completion of field activities	
5.6	Submit a one-year review workplan to describe inspection of the Site and evaluate the adequacy and integrity of the completed removal actions.	11 months from Implementation Report Date	
5.6	Conduct an inspection of the Site and evaluate the adequacy and integrity of the completed removal actions.	1 year from Implementation Report date	

5.6	Implement the one-year review workplan and submit a comprehensive report of the results of the review.	Within 60 days of One-Year Review Workplan Approval	
5.2	Work cooperatively with DTSC in providing public notice of response actions at the Site.	4/2/2025; as needed	As needed; ongoing
5.9	Take all appropriate action to prevent, abate, or minimize an emergency, release, or immediate threat of release of a hazardous substance and immediately notify DTSC Project Manager.	Immediately following an emergency	As needed; ongoing
5.9	Submit a report summarizing the emergency and the measures taken in response.	Within 7 days of the onset of emergency	As needed; ongoing
6.4	Perform all sampling and analysis according to DTSC-approved QA/QC procedures.	As needed	As needed; ongoing
6.10	Provide DTSC with access to the Site upon request and use best efforts to secure access to other sites as necessary to effectuate this Order.	4/2/2025; as needed	As needed; ongoing
6.11	Submit the data described in ¶ 6.11 in the specified format upon request.	Within 7 days of data request	As requested; ongoing
6.11	Inform DTSC of all field sampling conducted under the Order and allow DTSC to take duplicates of any samples collected.	7 days prior to field sampling	As needed; ongoing
5.11	Upon request, demonstrate to DTSC and maintain financial assurance for identified and approved operation and maintenance and monitoring activities.	Upon request	Upon request
6.12	Preserve all data, reports, and other documents after the conclusion of all activities under the Order and notify DTSC prior to destroying any document prepared pursuant to the Order.	Preserve 5 years after conclusion of all activities under Order; notify DTSC 6 months prior to destroying	Ongoing