

CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION

2019068083

To: Office of Planning and Research
State Clearinghouse
P.O. Box 3044, 1400 Tenth Street, Room 212
Sacramento, CA 95812-3044

From: Department of Toxic Substances Control
Brownfields restoration and School Evaluation
Branch
5796 Corporate Avenue
Cypress, CA 90630

Project Title: Area A Removal Action Workplan for Gallade Chemical Inc.

Project Location: 1230 E. Saint Gertrude Place, Santa Ana

County: Orange

Project Description: The project consists of the excavation and removal of approximately 1,400 tons (1,000 cubic yards) of soil located within Area A that is impacted with volatile organic compounds (VOCs). In addition, the project will include cutting, removing, and disposing of the existing concrete pavement (approximately 66 by 77 ft). There will be an average of 28 truck trips per day to transport the contaminated soil to an appropriate facility, import clean fill, and bring in material for the cap. The work will take approximately 13 working days. Following soil removal, groundwater monitoring will be conducted to assess the efficacy of soil excavation in reducing groundwater concentrations. The work described in the Area A Removal Action Workplan (RAW) is one of many ongoing steps towards complete soil and groundwater remediation at the Site.

Background: The Site consists of approximately 4-acres of concrete covered land located at 1230 E. Gertrude Place, in Santa Ana (Site), which is approximately 25 miles southeast of Los Angeles. The Site is located within an area zoned for light industrial use by the City of Santa Ana and includes three buildings. The southern portion of the Site contains a building used for warehouse space and chemical storage. The northern portion of the Site contains two buildings that are used for office space and dry chemical storage. Area A is located between the two buildings in the northern portion of the Site.

The northern portion of the Site has been used for storing, packaging, and distributing virgin chemicals since early 1975. Gallade purchased what is now the southern portion of the Site in 2002 and has used that area for the storage of packaged products since that time. Storage, packaging, and distribution activities have remained similar over the approximately 40 years of site operations. The zoning and use of the Site are not anticipated to change in the foreseeable future.

Environmental investigations conducted between 1988 and 2015 have detected VOCs (mainly, perchloroethylene, trichloroethene, and 1-4 dioxane) in soil and groundwater beneath the Site. A groundwater extraction and treatment system was installed and began operating in 1990. It was expanded in 2003 to include a dual phase extraction system. Both systems have been operating, maintained and upgraded since they were installed.

Environmental investigation and remediation were conducted under the oversight of the Santa Ana Water Quality Control Board (SARWQCB) beginning in 1997. On March 10, 2016, SARWQCB approved a Remedial Action Plan (RAP) which presents a comprehensive site-wide remediation plan that consists of:

- Soil excavation and offsite disposal,
- Operation and maintenance of groundwater and dual phase extraction treatment extraction,
- In-situ application of chemical oxidant,
- Institutional controls, and
- Natural attenuation.

The final remedy will be implemented in phases over a period of 15 years. A separate Removal Action Workplan or Remedial Action Plan will be submitted for each phase. Excavation at Area A is the first phase of the final remedy.

In June 2017, SARWQCB transferred oversight of the Gallade project to DTSC to continue the cleanup activities at the Site. Gallade and DTSC entered into a Remedial Action Agreement to initiate first phase of the RAP implementation, the Area A Removal Action, at the Site.

Project Activities: The proposed excavation includes the removal of the volatile organic compound source mass within an area known as Area A which measures approximately 66 by 77 feet. Excavation is expected to extend to a depth of 6 feet below ground surface and remove approximately 1,000 yd³ of soil (an average of 14 truck per day for 13 working days).

To the extent possible, excavated soil will be directly loaded into trucks for transport and disposal at a California-licensed facility. If necessary, excavated soil may be temporarily stockpiled onsite. The stockpiles will be covered and lined in accordance with applicable laws and regulations. Based on previously collected soil data, excavated soils are assumed non-hazardous for disposal at a Class III landfill, although this will be confirmed prior to excavation activities. Representative soil samples will be collected prior to and during the course of excavation and sent for waste characterization.

Soil confirmation sampling will be conducted to establish the concentrations of chemical of concerns at the limits of the excavation. VOCs remaining in soil will be evaluated, through future groundwater monitoring, to assess whether the soil mass removal was sufficient to improve groundwater quality to an acceptable level. After excavation is complete, a marker material will be placed to identify the bottom of the excavation. The excavated area will be backfilled with Clean Imported Fill Material (in accordance with DTSC's Information Advisory for Clean Imported Fill Material), compacted to engineering specifications, and resurfaced with reinforced concrete to match existing conditions. Area A will be monitored after soil removal to confirm the effectiveness of the remediation.

Airborne dust monitoring will be conducted in conformance with SCAQMD Rule 403 for fugitive dust emissions. Meteorological monitoring will be performed to monitor wind speed and direction using an onsite meteorological wind station. Dust control measures will be performed during the excavation activities to reduce the potential for fugitive dust and migration of contamination. The control measures will include the following:

- The perimeter of the work area will be secured with fencing fitted with low permeability windscreen, which reduces the potential for fugitive dust;
- Work will not be conducted when 15-minute average wind speeds exceed 15 mph, or when instantaneous wind speeds exceed 25 mph;
- Dust suppression will be performed by lightly spraying or misting the active work with water;
- The drop height from the excavator or loader bucket into transport trucks or roll-off bins will be minimized;
- After soil is loaded into transport trucks or roll-off bins, the soil will be covered to prevent spillage during transport;
- While on the site, all vehicles will maintain slow speeds (i.e., less than 5 mph) for safety and dust control purposes; and
- Street sweeping of onsite truck routes and adjacent public streets may be performed (as necessary) to reduce the potential for fugitive dust and contaminant migration.

Work is anticipated to begin during the third quarter of 2019 and last approximately 13 working days.

Name of Public Agency Approving Project: Department of Toxic Substances Control

Name of Person or Agency Carrying Out Project: Gallade Chemical, Inc.

Exemption Status: (check one)

- Ministerial [PRC, Sec. 21080(b)(1); CCR, Sec. 15268]
 Declared Emergency [PRC, Sec. 21080(b)(3); CCR, Sec. 15269(a)]
 Emergency Project [PRC, Sec. 21080(b)(4); CCR, Sec. 15269(b)(c)]
 Categorical Exemption: [CCR, Sec. 15330]
 Statutory Exemptions: [State code section number]
 General Rule [CCR, Sec. 15061(b)(3)]

Exemption Title: Minor Actions Taken to Prevent, Minimize, Mitigate, or Eliminate the Release or Threat of Release of a Hazardous Waste or Hazardous Substance


Reasons Why Project is Exempt:

1. The project is a minor action designed to prevent, minimize, stabilize or eliminate the release or threat of release of hazardous waste or hazardous substances.
2. The project will not exceed \$1 million in cost.
3. The project does not involve the onsite use of a hazardous waste incinerator or thermal treatment unit or the relocation of residences or businesses and does not involve the potential release into the air of volatile organic compounds as defined in Health and Safety Code Section 24123.
4. The exceptions pursuant to Cal. Code Regs., tit. 14, 15300.2 have been addressed as follows:
 - a. Cumulative Impact: The project will not result in cumulative impacts because it is designed to be a short-term, final remedy that would not lead to a succession of projects of the same type in the same place over time.

- b. Significant Effect: the environmental safeguards and monitoring procedures that are enforceable and made a condition of project approval will prevent unusual circumstances from occurring so that there is no possibility that the project will have a significant effect on the environment.
- c. Scenic Highways: the project will not damage scenic resources, including but not limited to: trees, historic buildings, rock outcroppings, or similar resources because it is not located within a highway specifically designated as a State scenic highway.
- d. Hazardous Waste Sites: the project is not located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.
- e. Historical Resources: the project will not cause a substantial adverse change in the significance of a historical resource because the soil beneath the Site was previously disturbed.

Evidence to support the above reasons is documented in the project file record, available for inspection at:

Department of Toxic Substances Control
Brownfields Restoration and School Evaluation Branch
5796 Corporate Avenue, File Room
Cypress, California 90630

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TO BE COMPLETED BY OPR ONLY

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