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Department of Toxic Substances Control

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NOTICE OF EXEMPTION

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
Northern California Permitting and
Corrective Action Branch
8800 Cal Center Drive
Sacramento, CA 95826

Project Title: Blue Hills Disposal Facility – Convert from Interim Status to Postclosure Permit

Project Location: About 9 miles north of Coalinga, in Blue Hills

County: Fresno County

Project Description: This project consists of converting the Blue Hills Disposal facility (Facility/site) from Interim Status to Postclosure Permit status. No physical changes to the site are proposed. In 2005, Department of Toxic Substances Control (DTSC) certified that the Closure Cover System for the Blue Hills Disposal Facility was installed as designed. Under those conditions, state and federal regulations require that a postclosure plan for a 30 -year period be developed and implemented by the facility. The Postclosure Permit outlines the procedures to fulfill these regulatory requirements which consist of three primary functions: a) maintenance of the closure cover, b) environmental monitoring; and c) maintenance of financial mechanisms to fund the postclosure activities.

Background

Location and Usage

Fresno County owns the closed Facility. The 32-acre site contains no structures, with the exception of groundwater monitoring well heads, a security fence, and engineered surface water drainage ditches. The site is not occupied by personal, but visited only once per quarter for site inspections and groundwater monitoring events. The site is located in a remote location about 9 miles northwest of Coalinga, in the western flank of the Blue Hills. Interstate 5 is located about 2 miles east of the site. The land use surrounding the Facility is limited to oil and gas production (as evidenced by pumping jacks) and occasional cattle grazing. With the exception of a receptor one mile northeast of the site, no other receptors are within a two mile radius of the site. The Facility consists of four closed landfill Waste Management Units (WMU) which received waste pesticide containers between 1973 and 1991. The WMU were capped in 1992 with a three layer soil cover. The most recent cover inspection, conducted on November 2, 2005, revealed it to be in good condition. Potential impacts to the cover from surface water are limited. The average rainfall for the site is 10 inches per year and the mean evaporation rate for the site (as measured from a Coalinga Station) is 65 inches per year. Asphalt lined drainage ditches are systematically located on site, to direct surface water away from and around the WMU

Groundwater

The Regional Water Quality Control Board's, Waste Discharge Requirement (Order No. 99-087) identifies the groundwater as poor quality (total dissolve solids 2,500 to more than 11,000 milligrams per liter) and

meets the criteria for consideration of exemption from beneficial use designation. The site is underlain by four potential groundwater bearing sandstone units, although groundwater is present in only two of the sandstone units. The two low-yielding groundwater bearing sandstone units will be monitored semi-annually using a network of eight groundwater monitoring wells. Groundwater monitoring at the facility has been conducted since 1986. Naturally occurring organic hydrocarbons have been detected in monitoring wells at the site. The most noted constituents detected in groundwater are the herbicides *Dicamba* and *2-(2-Methyl-4-Chlorophenoxy) Propionic Acid* (MCP) which are highly soluble in water. Both chemicals have low toxicity with no established Maximum Contaminant Levels. The constituent transport mechanism for these chemicals is more likely due to the concentration gradients rather than advective groundwater flow. The apparent groundwater flow rates are low (less than 11 feet per year along strike of beds, and less than 5 inches per year perpendicular to aquitards), as observed in groundwater yields from monitoring wells (0 to 10 gallons per minute) and as noted in chemical-detection response times between wells.

Air

EMCON Associates (EMCON) prepared an Air Quality Solid Waste Assessment Test Report for the Blue Hills Disposal Site in Fresno County. An air assessment test was performed in September 1988 which identified compound emissions from the surface of the landfill. The assessment included collecting integrated surface samples from the landfills, ambient air samples from the perimeter, and gas probe samples from subsurface locations near the site boundaries. The samples were analyzed to determine whether gases from air emissions or soil pores were migrating off-site. Volatile organic compounds (VOC) were detected at the surface of the landfills and in ambient air. In some instances the ambient results were relatively higher than the landfill results, making EMCON's conclusions for gas migration indeterminate. The report, however, recognized the presence of naturally occurring gas in surrounding oil fields as an influence of the ambient results. EMCON did, however, mention that the potential for off-site gas migration appeared to be low.

Based on the indeterminate conclusion of the EMCON report, Permit Renewal Team staff conducted an analysis of available information to assess whether a monitoring program for ambient air and soil pore gas is required as part of the Postclosure Permit for the closed Blue Hills Disposal Facility. Some of the information recognized during the analysis included the following: 1) although the EMCON report did not provide definitive conclusions, they stated that the potential for offsite migration was very low, 2) the EMCON report indicated that naturally occurring petroleum is in the vicinity of the site which can affect ambient results, 3) the site is not occupied by personal, but visited only once per quarter, and 4) one receptor exists within a one mile-radius of the site. Based on this analysis Permit Renewal Team staff determined that further monitoring for air and soil pore gas at the Blue Hills Disposal site was not necessary.

Project Activities

To convert the Blue Hills disposal facility to Postclosure Permit status the following tasks were required:

- Fresno County prepared a Final Postclosure Permit Application
- DTSC reviewed the application and required changes as part of Notice of Deficiencies
- DTSC prepared a Draft Postclosure Permit
- The Draft Permit received a 30-day public comment period
- Permit approval

The Postclosure Permit includes three main requirements:

1. Regular inspection and maintenance of the cover and drainage systems (with corrective action as necessary);
2. Environmental monitoring, consisting of regular monitoring well inspection, sampling, and data statistical analysis; and,

3. Provisions of financial mechanisms to fund the postclosure activities for 30 years.

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

Name of Person or Agency Carrying Out Project: Fresno County

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: [State type and section number]
- Statutory Exemptions: [State code section number]
- General Rule [CCR, Sec. 15061(b)(3)]

Exemption Title: Title 14, California Code of Regulations, Section 15061 (b)(3).
With certainty, no possibility of significant environmental effect.

Reasons Why Project is Exempt: This project consists of converting the Blue Hills Disposal facility from Interim Status to Postclosure Permit status. With the exception of periodic environmental monitor sampling, cover inspections, and minor repairs of cover of drainage, no physical changes to the site are proposed. Control measures that will limit environmental effects to insignificant levels include the following:

- The Closure Cover Certification Report approved by an independent registered engineer (signed by William Farrington P.E. September 30, 1993), certified that the Blue Hills Disposal facility cover was built according to the approved plans and in good working order.
- For the purposes of groundwater monitoring, the DTSC Geological Services Unit and the Regional Water Quality Control Board have approved an updated Sampling and Analysis Plan (SAP) which adequately monitors the site hydrogeology. Major features of the SAP include: Water Quality Protection Standards, a list of Constituents of Concern, Concentration Limits, Monitoring Points, Points of Compliance and the Reporting Program.
- The Postclosure Permit includes a provision to restrict future land uses at the Blue Hills Disposal Facility via a Land Use Covenant signed between DTSC and the Fresno County. The land use covenant restricts future use of the property.
- The site is secured from unauthorized entry by fence and locked gate.
- Post-closure activities are carefully regulated to assure against the potential for any additional environmental concerns. The post-closure permit will require regular monitoring of groundwater for evidence of releases. Pursuant to DTSC authority, any new discoveries will trigger an examination and evaluation of this notice of exemption (NOE) relative to the statutory and regulatory requirements of the California Environmental Quality Act (CEQA). Any constituent release will trigger corrective action mechanisms such a Corrective Action Consent Agreement or Unilateral Correction Action Order, as well as evaluation of this NOE for CEQA compliance.

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<u>Project Manager Name</u>	<u>Project Manager Title</u>	<u>Phone #</u>
_____	_____	_____

_____ Permit Renewal Team Signature	_____ Date
_____ Ray Leclerc P.E. Permit Renewal Team	_____ Phone #

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