

## **STATEMENT OF BASIS**

Proposed Remedy for Corrective Action

Former Commonwealth Aluminum Facility  
2211 – 2307 East Carson Street  
Carson, California  
Los Angeles County

Prepared by

Tiered Permitting Corrective Action Branch  
Hazardous Waste Management Program  
Department of Toxic Substances Control

John Geroch  
Supervising Hazardous Substances Scientist I

November 21, 2007

## Table of Contents

1. Introduction	1
2. Proposed Remedy	1
3. Facility Background	3
4. Summary of Facility Investigation	4
5. Summary of Target Soil Remediation Goals	5
6. Summary of Remedial Alternatives	5
7. Evaluation of Proposed Remedial and Alternatives	5
8. Recommendation for Final Remedy	5
9. Public Participation	6
10. Implementation and Enforcement Plan	6

Table 1: Comparative Analysis of Remedial Alternatives

Attachment A: Terminology

## **1. Introduction**

The Department of Toxic Substances Control (DTSC) has prepared this Statement of Basis describing the proposed remedy to complete corrective action at the former Commonwealth Aluminum facility (Commonwealth) located at 2211 – 2307 East Carson Street, Carson, California. This document presents a description of the proposed remedy and the basis for selection and DTSC invites the public to review and comment on the proposed remedy.

The proposed remedy consists of soil excavation and disposal at a permitted offsite facility and implementation of a land use covenant (LUC) limiting future use of the property to industrial/commercial uses for the protection of human health and the environment. The property shall not be used for residential, day care, hospitals, nursing homes, or schools with out the prior approval of DTSC. After remediation of the site is completed the current property owner, ProLogis ProLogis Exchange CA (7) L.L.C. (ProLogis) plans to redevelop the property for commercial/industrial uses. The City of Carson has approved ProLogis' redevelopment plans during a public meeting on August 7, 2007.

*This Statement of Basis summarizes information presented in greater detail in the Corrective Measures Proposal, Former Commonwealth Aluminum Facility (CMP) dated November 8, 2007. Additional documents in the administrative record for the Commonwealth project are available for review at the information repository at DTSC's regional office located 5796 Corporate Avenue, Cypress, California 90630. DTSC encourages the public to review these documents in order to gain a more comprehensive understanding of the project and the corrective action activities that have been conducted and are being proposed.*

## **2. Proposed Remedy**

ProLogis proposes to excavate approximately 3,300 cubic yards of soil exceeding the site-specific risk-based screening levels (RBSLs) for a future commercial/industrial land use scenario. The areas where soil exceeds the RBSLs are identified in the CMP and the proposed excavations will be to about 20 feet below ground surface (BGS) in some of these areas. Post excavation confirmation soil samples will be collected from each removal area to confirm that the cleanup goals have been achieved. If necessary, additional soil will be excavated and additional post confirmation soil samples will be collected until the cleanup goals are achieved. Once the excavation has been completed clean soil will be brought to the site and used to backfilled the excavations. The soil excavation and backfilling of the excavations will take approximately 90 days to complete.

Excavated soil will be profiled based on analytical data from the site investigations, or by specific sampling requirements provided by the specific disposal facilities to ensure the waste is transported to the appropriate location. A Soil Management Plan presenting the procedures for the excavation and management of soil onsite has been prepared and incorporated in to the CMP. Excavated soils will be loaded onsite in to the dump trucks using an articulated front-end loader, or similar piece of equipment. Real-time dust monitoring for particulate matter of 10- microns (PM-10) will be performed using an MIE pDR-1000 particulate monitor (personal DataRAM), or equivalent, during excavation and loading. A Dust Monitoring Plan presenting the details of the air monitoring and dust control measures and a Health and Safety Plan for the activities required to implement the proposed corrective measures have been developed and incorporated into the CMP.

Approximately 220 truckloads, not to exceed 50 truckloads per day, will be needed to transport the soil to the permitted offsite facilities. All trucks will be covered prior to leaving the site and will be in compliance with applicable Department of Transportation (DOT) regulations. The waste manifests and/or Land Disposal Restriction notification forms will accompany each truck to the offsite disposal facilities. A Transportation Plan presenting how soils and demolition debris will be managed during transportation to the offsite disposal facilities has been prepared and incorporated in to the CMP. The transportation route to each disposal site was planned to minimize traffic congestion and to avoid residential neighborhoods and schools.

Soil classified as hazardous waste will be disposed of at the Kettleman Landfill located at 35251 Old Skyline Road, Kettleman City, California. Soil classified as non-hazardous waste will be disposed of at either the Kettleman landfill or the Azusa-BDC Special Waste Services Landfill operated at 766 S. Ayon Avenue, Azusa, California. Soils containing only non-hazardous levels of petroleum hydrocarbons may be sent to the Thermal Remediation Solutions treatment facility located at 1211 W. Gladstone Avenue, Azusa, California.

The proposed remedy also consists of a LUC restricting future use of the property to only commercial/industrial uses. The LUC will be signed by DTSC and ProLogis and recorded with the Office of the County Recorder. The LUC will "run with the land" limiting future owners and operators to only commercial/industrial land uses. DTSC has authority to enforce the LUC pursuant to State law. The LUC will also require the continued maintenance of the asphalt cap currently in place over the solid waste landfill and annual groundwater monitoring to detect if contaminants begin to migrate in to the groundwater.

### 3. Facility Background

Since 1947 various companies have operated an aluminum scrap recycling and rolling facility at the site. Previous owners/operators of the Site include Apex Smelting Company, Alflex Corporation, Barmet Aluminum Corporation, Commonwealth Aluminum and Aleris. In 1993, Commonwealth was authorized by DTSC to operate an onsite hazardous waste treatment facility pursuant to conditional authorization. Operations at the facility ceased in about March 2006 and the facility was decommissioned through November 2006. In a letter dated November 30, 2006, the Los Angeles County Fire Department concurred that closure of the conditionally authorized unit was found to be in compliance with regulatory standards and that all waste residues, containment system components, structures and equipment contaminated with hazardous waste had been removed or decontaminated. The property was acquired by ProLogis Exchange CA (7) LLC (ProLogis) in December 2006 and the property has been vacant since then.

During World War II gravel was excavated from the northeastern portion of the Site resulting in a large excavation. When excavation of gravel ceased, the excavation was used to dispose of various debris and waste from about 1937 to 1961 and is known as the California By-Products Landfill. Materials managed in the landfill included rock, sand, gravel, paving fragments, concrete, brick, plaster, cement, asbestos and dry mud cake from oil field sumps. The landfill was closed in 1961 and is currently paved and used for truck trailer parking.

A Solid Waste Assessment Test (SWAT) was conducted to investigate potential threats to groundwater quality by installing a groundwater monitoring well network. The results of the SWAT are presented in the Solid Waste Water Quality Assessment Test dated June 25, 1990, by Woodward-Clyde Consultants, and the Addendum To: Solid Waste Assessment Test dated November 29, 1990. In a letter dated December 8, 1993, the California Regional Water Quality Control Board, Los Angeles Region (Regional Board) concluded "The SWAT monitoring program for this site demonstrated that the monitoring system was capable of detecting a release. As this meets the requirements of Section 13273(d) of the California Water Code, we therefore approve your SWAT report." The landfill is inspected annually by the Los Angeles County Department of Health Services, Environmental Health Division (EHD) which serves as the Local Enforcement Agency (LEA) for the California Integrated Waste Management Board (CIWMB).

The proposed corrective measures address the soil contamination associated with the former commercial operations. No cleanup of the landfill is proposed. The landfill will continue to be used for truck trailer parking, therefore paving will be maintained over the landfill footprint to support this continued use.

Continued monitoring of groundwater quality down gradient of the landfill is required as a long-term leak detection program and groundwater quality monitoring reports were previously submitted to the Regional Board for review. On June 27, 2007, the Regional Board transferred oversight for cleanup of the site to DTSC. As part of the transfer of oversight, the Water Board requested that DTSC undertake evaluate the groundwater monitoring program data. ProLogis and future site owners are required to continue the required groundwater quality monitoring program and the water quality reports will be submitted to DTSC for review.

#### **4. Summary of Facility Investigations**

Since 1987 numerous site investigations have been conducted to evaluate potential environmental impacts from the aluminum rolling and recycling operations. The investigations included collecting and analyzing more than 100 soil, soil vapor and groundwater samples. Soil samples were analyzed for metals, volatile organic compounds (VOCs), and petroleum hydrocarbon and petroleum hydrocarbon speciation. These investigations show that subsurface soils were contaminated primarily with petroleum hydrocarbons from leaking underground storage tanks containing diesel and gasoline and from lubricating oil used during the rolling process. Low concentrations of several chlorinated VOCs were found in soil in limited areas. Soil saturated with lubricating oil was found beneath the rolling oil sump.

Soil vapor samples were analyzed for VOCs by United States Environmental Protection Agency (EPA) method TO-15. Low concentrations of several VOCs including trichloroethene (TCE), perchloroethene (PCE), and 1,1-dichloroethene (1,1-DCE) were detected in the vapor phase at some locations.

Groundwater samples were analyzed for VOCs, petroleum hydrocarbons and petroleum hydrocarbon speciation, metals and PCBs. The VOCs TCE, PCE, 1,1-DCE and 1,1-dichloroethane (1,1-DCA) were detected at low concentrations in groundwater. The concentration of TCE and 1,1-DCE did exceed the California Department of Health Services Maximum Contaminant Levels (MCLs) during some of the monitoring events, but recent monitoring data for all VOCs shows a trend of decreasing concentrations and all VOC concentrations are now less than their respective MCLs. Rolling oil was present as a thin layer on the groundwater and accumulated in several groundwater monitoring wells. Free product was recovered from several wells periodically when enough free product had accumulated. Due to the limited concentration and extent of VOCs and rolling oil no groundwater remediation is proposed.

## 5. Development of Risk-Based Screening Levels (RBSLs)

The potential risk from contaminants in soil was calculated to evaluate current conditions and establish cleanup levels for a commercial/industrial land use scenario that is protective of human health. The RBSLs were calculated based on site-specific conditions and the RBSLs and a detailed presentation about their development is presented in Chapter 6 and Appendix C of the CMP. Due to the site location potentially toxic chemicals are not expected to contaminate media which may affect wildlife or wildlife habitats, either onsite or offsite, directly or indirectly, and therefore, eliminate the need to conduct an ecological risk assessment.

## 6. Summary of Remedial Alternatives

Four remedial alternatives were evaluated in the CMP. The four alternatives for this were:

1. **Alternative 1:** No action - leave contaminated soil in place with out any land use restrictions.
2. **Alternative 2:** Leave soil contamination in place and implement a land use covenant allowing only commercial/industrial uses in the future.
3. **Alternative 3:** Remediate contaminated soils exceeding site-specific risk-based screening levels for a commercial/industrial land use scenario through excavation and disposal at an offsite permitted facility and implementing a land use covenant to allow only commercial/industrial uses of the property.

## 7. Evaluation of Alternatives and Proposed Remedy

Each remediation alternative was evaluated against a set of eight criteria to determine which alternative is most effective for the protection of human health and the environment for a future commercial/industrial land use scenario. Table 1 presents each alternative and the criteria used to evaluate the alternatives.

## 8. Recommendation for Final Remedy

Based on the evaluation of the three remediation alternatives, Alternative 3 was selected as the proposed remedy for the site. Alternative 3 consists of:

- Excavation and offsite disposal of the impacted soil and backfill of excavation with certified clean fill.
- Implementation of a deed restriction to limit future land use to *commercial/industrial uses*. The LUC will prohibit use of the site for residential, hospital, daycare and schools. The LUC will also include a notification requirement to inform future owners and contractors who perform *subsurface work at the site of the presence of residual contamination in subsurface soils at the site*. The LUC will provide notice to future owners of the land use restrictions, require the maintenance of the existing paving over the landfill and require annual groundwater monitoring and reporting.

#### **9. Public Participation**

The DTSC is soliciting comments from the public on the proposed corrective measures presented in the CMP. A public notice in English and Spanish will appear in the Daily Breeze on November 21, 2007 informing the community that DTSC is soliciting public comments for a period of 30 days from November 21, 2007 to December 24, 2007 and that DTSC encourages public participation in the decision process. Written comments may be submitted to:

Mr. Nebu John  
DTSC Project Manager  
Department of Toxic Substances Control  
5796 Corporate Avenue  
Cypress, California 90630  
(714) 484-5475

#### **10. Implementation and Enforcement Plan**

As required by the California Code of Regulations, Title 22, section 67391.19 an Implementation and Enforcement Plan (Plan) will be incorporated in to the LUC. The Plan identifies activities to be conducted by the property owner(s) and any subsequent owner(s) to ensure compliance with the LUC. The Plan also provides for inspections by DTSC to ensure compliance with the LUC. DTSC has authority to enforce the terms and conditions in the LUC pursuant to State law.

**Table 1**  
**Comparative Analysis of Remedial Alternatives**

<b>Criteria</b>	<b>Alternative 1: No Further Action</b>	<b>Alternative 2: LUC</b>	<b>Alternative 3: Implementation of Proposed Corrective Measures</b>
1. Overall protection of human health and environment	Is not protective of human health or the environment.	Provides increased protection of human health provided conditions of covenant are implemented	Protects human health for intended use of property and reduces additional contamination of the underlying groundwater.
2. Reduction of toxicity, mobility or volume	Will not reduce toxicity, mobility or volume of contaminants.	Does not reduce toxicity, or volume.	Significantly reduces volume of contamination and significantly reduces potential risk to human health and environment.
3. Long-term effectiveness and permanence	Does not provide long-term effectiveness	Limits future land use and exposure to contaminants.	Removal of contamination from property eliminates need for engineering controls
4. Short-term effectiveness	Does not provide short-term effectiveness.	Will allow for immediate reuse of the property	Potential exposure to construction workers and public. A health and safety plan and dust control plan will be employed to protect construction workers and the public.
5. Technical feasibility	Requires no remedial action	Requires approvals from State and local regulatory agencies.	Technical approach is clear and easily implementable. Requires approvals from State and local regulatory agencies.
6. Administrative feasibility	Requires no remedial action.	Requires approvals from State and local regulatory agencies.	Requires approvals from State and local regulatory agencies.
7. State acceptance	Under intended Site redevelopment, not acceptable to State because contamination exceeding environmental screening levels would remain on site.	Under intended Site redevelopment, not acceptable to State because contamination exceeding environmental screening levels would remain on site.	Under intended Site redevelopment, acceptable to State because it addresses short-term and long-term protection of the community.
8. Community acceptance	Likely not acceptable to the community because contamination will remain on property. Community acceptance will be based on comments received during 30-day public comment period.	Likely not acceptable to the community because contamination will remain on property. Community acceptance will be based on comments received during 30-day public comment period.	Likely acceptable to the community because contamination will be removed from the property. Community acceptance will be based on comments received during the 30-day public comment period.

## Attachment A

### TERMINOLOGY

**Administrative Record** - The documents and information that are considered or relied upon to make a remedy selection decision for a site. These documents are available for public inspection usually at a public library near the site and at the DTSC's office.

**Department of Toxic Substances Control (DTSC)** - The state agency which is responsible for regulating hazardous waste in California. DTSC has the authority to enforce federal and state hazardous waste regulations.

**Contaminants of Concern (COCs)** - Chemicals associated with releases from the site, which are of concern due to their current or future potential effects on human health or the environment.

**Corrective Action** - Action to be taken to investigate and cleanup releases from hazardous waste treatment, storage, and disposal facilities.

**Corrective Action Consent Agreement** - A legal agreement describing conditions at a site and actions to be taken to protect human health and the environment. The agreement is signed by DTSC and an individual, business, or other entity through which the responsible party agrees to perform, or to pay the cost of, the corrective action. The agreement can be enforced in court and does not have to be approved by a judge.

**Corrective Measures Proposal (CMP)** - A proposal providing a description of current site conditions, an evaluation of remedial alternatives and an explanation supporting the proposed final remedy.

**Risk-Based Screening Levels** - Site-specific cleanup goals for each of the contaminants of concern developed for the protection of human health and the environment based on the proposed current and future land use.

**Land Use Covenant** - Recorded land use restrictions are set forth in a document which can specify requirements on real property and can limit current and future use of the property to only those allowed in the restrictions.

**Maximum Contaminant Level (MCL)** - The highest level of a contaminant that allowed in drinking water as determined by the California Department of Health Services.

**Resource Conservation and Recovery Act (RCRA)** - A federal law that established a regulatory system to track hazardous waste from the time of generation to disposal. The law requires facilities to obtain a permit if they treat, store or dispose of hazardous waste. RCRA is designed to prevent new, uncontrolled releases of hazardous waste.

**Statement of Basis** - Document explaining how and why the proposed remedy was selected.

**Volatile Organic Compound (VOC)** - Generally organic compounds having a Henry's law constant greater than  $1 \times 10^{-5}$  atmospheres-meter/mole and a molecular weight less than 200 grams/mole. The potential volatilization and migration of vapors from subsurface soils to indoor air is evaluated for VOCs.