

**NOTICE OF EXEMPTION**

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

**From:** Department of Toxic Substances Control (DTSC)  
Brownfields and Environmental Restoration Prgm  
8800 Cal Center Drive  
Sacramento, California 95826

**Project Title:** Ecology Control Industries, Inc. – Richmond Facility, Statement of Basis

**Project Location:** 255 Parr Boulevard, Richmond, California

**County:** Contra Costa

**Project Description:** The project involves the selection of a remedy to address the release of hazardous waste or hazardous waste constituents at the Ecology Control Industries, Inc. (ECI) Richmond Facility. Based on the RCRA Facility Investigation (RFI) report dated May 6, 2010, and the draft Statement of Basis dated July 26, 2010, the proposed remedy for the site is no further action. The investigation of the site confirmed that a release of petroleum products occurred from the Tank Staging Area, a permitted hazardous waste management unit.

**Background:** ECI has a Hazardous Waste Facility Permit (Permit) to process used fuel storage tanks (USTs) at the Facility. Processing of tanks involves initially rendering the tanks gas free and then cutting open the tanks to remove residual petroleum products (liquid and semi-solid material). The tanks are then size reduced to facilitate recycling or disposal depending on the materials of construction. The liquid and semi-solid material removed from USTs is initially stored on-site and then sent to an off-site facility for either reclamation or disposal. ECI is completing corrective action at the site pursuant to California Health and Safety Code, Section 6.5, and in accordance with a corrective action consent agreement entered into with DTSC dated February 21, 2007 [Docket HWCA: P2-06/07-005]. The completion of corrective action is also a condition of the Facility Permit. Neighboring properties that surround ECI Richmond comprise commercial, industrial and residential uses.

The ECI Facility is on the Cortese list of hazardous waste sites due to releases from leaking operational USTs used for fuel storage. The leaking tanks were removed and the area was cleaned up under the oversight of the Regional Water Quality Control Board. Residual petroleum hydrocarbons were present at the site at closure of the UST case. It is possible that some of the contaminants observed during the corrective action investigation are in fact remnants of the release from the operational USTs at the site. However, the objective of corrective action was not to reopen the closed UST case.

The shallow first encountered groundwater below the site is present under confined conditions. Groundwater is first encountered at approximately 15 feet below ground surface (ft bgs) and equalizes to a static water level of approximately 5 ft bgs. The site hydrogeology may be influenced by San Pablo Bay located approximately 0.5 miles northwest of the facility and San Pablo Creek located approximately 500 feet south of the facility.

**Project Activities:** ECI completed an investigation of the site to fully characterize releases to soil and groundwater. The findings of the investigation are documented in the RFI Report dated May 6, 2010. The RFI also described a soil removal action completed as part of the preparation for the foundation of the new Tank Staging Area pad.

- **Remedy for Contaminated Soils:** The remedy implemented for soils was excavation and off-site disposal. ECI successfully excavated and removed 161 cubic yards of contaminated soil. Confirmation soil samples were collected from the limits of the excavation to confirm removal of all soil exceeding pre-agreed cleanup levels. No further action is planned beyond the removal action already completed.
- **Remedy for Secondary Containment:** The remedy implemented for the Tank Staging Area pad was removal and reconstruction. The new compliant secondary containment should prevent future releases of hazardous waste to the environment. No further action is planned beyond the action already completed.
- **Remedy for Groundwater:** The proposed remedy for groundwater is no action. For the analysis performed, there are no constituents present in groundwater at levels exceeding primary Maximum Contaminant Levels (MCLs). Total Petroleum Hydrocarbons (TPH) in the diesel range was noted at up to 2,600 ug/L. The levels of TPH diesel in groundwater are expected to reduce with time due to natural dispersion and biodegradation processes. The probability of use of groundwater at the site as a drinking water supply is low. There are no public drinking water wells located within a one (1) mile radius of the site. The groundwater contaminant plume is confined to the ECI Richmond site.

