

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
Tiered Permitting Corrective Branch

5796 Corporate Avenue

Cypress, California 90630

Project Title: GCA Lease Holding, Inc., Interim Measures for Excavating Impacted Soils

Project Location – Specific: 17006 South Figueroa Street

Project Location – City: Carson

Project Location – County: Los Angeles

Description of Project:

The project is an Interim Measures (IM) Workplan for the excavation of impacted soil, which resulted from past wheel plating operations at the facility.

Background

An investigation conducted in late 2005 found that the soils in the former plating department on the west side of Building 2, and isolated areas in Building 1 and the wastewater treatment area have been impacted with heavy metals. Also, two other isolated areas at the former wastewater clarifier on the east side of Building 1 and a drain pipe on the east side of Building 2 were identified to be impacted. The following maximum concentrations of heavy metals were identified:

- Antimony 21 mg/kg
- Arsenic 21.4 mg/kg
- Chromium (hexavalent) 240 mg/kg
- Copper 240 mg/kg
- Lead 384 mg/kg
- Nickel 12,500 mg/kg
- Vanadium 46.7 mg/kg
- Zinc 3,040 mg/kg

The 4.76-acre facility is paved with concrete and contains two 30-foot high-bay single story structures. The facility is located in a heavy industrial area and is bordered on the north, south, and east by industrial development and on the west by single family residential properties. The nearest residence is greater than ¼ mile from the areas of the facility where work will occur. Soil will be stockpiled on paved areas within the east bay of Building 2 and within perimeter walls and fences. There are no schools within a quarter mile radius of the facility boundaries.

The facility was closed in August 2005. All tanks and process equipment and raw materials were removed and properly disposed under waste manifests.

Project Activities

The project is to conduct excavation and disposal of the impacted soils. The soil excavation will take place predominantly within the west side of building 2 and within the areas of the former wastewater treatment area and Building 1. The depth of the proposed excavations will generally not exceed 2.5 feet over the majority of the impacted area with eleven localized areas that may extend to 6.5 feet. Additionally, two other isolated areas will be excavated to an indeterminate depth to facilitate the removal of a former wastewater clarifier on the east side of building 1 and a drain pipe on the east side of building 2.

Approximately 1,000 tons of impacted concrete and 5,370 tons of impacted soils will be excavated. All concrete and most soils will be directly loaded into end-dumps for off-site disposal. Some impacted soils may be stockpiled on the concrete pad within building 2 prior to load-out. Engineering controls will be applied during excavation and load-out to prevent dust generation and to minimize potential exposure to on-site workers and the surrounding community. In addition, water spray, as necessary, and stockpile covers held down by sand bags will be applied to the clean fill stockpile located between buildings 1 and 2 to prevent dust generation, to minimize potential exposure to on-site workers and the

surrounding community, and to prevent any impact to storm water runoff from the site.

Soil removal activities will be conducted in accordance with the approved IM Workplan and its Health and Safety Plan (HASP). The following measures will be implemented:

- Metals impacted soil will be excavated and properly disposed at the Clean Harbors Landfill in Buttonwillow, California or the Chemical Waste Management, Kettleman Hills facility. The depth of excavation will not exceed 6.5 feet. Field measurements using XRF will be performed during excavation to approximate the preliminary site cleanup levels.
- Confirmation sampling will be performed after the excavation to determine if the contaminated soils have been removed and any remaining residue will be addressed later in the final remedy selection.
- Control of fugitive dust emissions and storm water run-off will be done during excavation to minimize potential exposure to on-site workers and the surrounding community. Dust control measures shall include lightly spraying or misting the loading and unloading of soil and all work areas with water, situating exterior stockpiles in areas shielded from prevailing winds, and covering exterior stockpiles.
- Although the proposed project is not defined by SCAQMD as a large operation and the majority of the activities will occur within buildings 1 and 2, several Best Available Control Measures from Table 1 of Rule 403 will be implemented. These include a paved surface extending at least 100 feet and at least 20 feet wide at the vehicle egress from the site; a wheel spreading device consisting of raised dividers to remove bulk materials; use of tarps or other appropriate covers on all haul trucks; emptying loader buckets slowly so as not to generate dust plumes; and lighting spraying or misting of soils during loading operations.
- Based on analytical data regarding soil VOCs at the site, Rule 1166 will not apply according to the SCAQMD. However, periodic PID readings will be conducted to assure that VOC emissions from soil excavations, stockpiling and load-out do not equal or exceed 50 ppm (calibrated to hexane)
- Emission estimates from diesel tractor/trailers were calculated for transportation. Based upon 50 trucks/day, the NOx emission rate would be 2.08 lbs/day, which is well below the emission threshold of 125 lbs/day requiring mitigation measures.
- The facility will be fenced, secured with warning signs and kept under security watch 24 hours a day and seven days a week to reduce the potential for unauthorized personnel to enter the work area.

To protect workers at the site, the excavation and confirmation sampling activities will be conducted in accordance with the DTSC approved IM Workplan and HASP. An exclusion zone will be prepared and access will be controlled. Best Management Practices ("BMPs") such as use of sandbag barriers, wind erosion control (various dust palliatives), sweeping and vacuuming will be applied during site remediation activities to ensure that wind erosion is minimized and that sediment carried by storm water run off is retained on site. Most of the activities will be taking place inside buildings 1 and 2. However, in the event that wind speed exceeds 18 miles per hour or wind dispersal of particulates is observed by the site safety officer or designee, all exterior work will cease until the wind speed falls below 18 miles per hour.

All trucks will be staged on a concrete pad for loading. The soil will either be directly loaded into end dump trucks by the excavator, or it will be temporarily stockpiled and loaded into end dump trucks using a front-end wheel loader. All loads will be properly covered with a tarp and all loose soils brushed from the trucks prior to exiting the site. All soils brushed from the trucks prior to their departure will be collected from the loading area and retained on site for subsequent disposal. All debris and track out will be removed from the roadway at the conclusion of each working day. The anticipated location of the stockpiles will be on the east side of building 1. It is anticipated that approximately 290 truckloads, each carrying approximately 22 tons of excavated soil or concrete will be transported from the facility. No more than 50 trucks transporting the soil will leave the facility on any given day and it will take about 6 to 12 days to complete.

The trucks will exit the facility going east on West Sherman Avenue, turn right (south) on South Broadway, turn right (west) on West Albertoni Street, turn right (north) on South Vermont Avenue, and turn right (east) on West Artesia Boulevard. The trucks will enter the 110 Freeway southbound, travel to the 405 Freeway, merge onto the 405 Freeway northbound to the 5 Freeway, and merge onto the 5 Freeway and continue to the final disposal destination facility.

Data gathered during the confirmation sampling will be used to perform a human health risk evaluation prior to determining the final remedy selection for the site.

Name of Public Agency Approving Project: DTSC

Name of Person or Agency Carrying Out Project: GCA Lease Holding, Inc.

Exempt Status: (check one)

- Ministerial (Sec. 21080(b)(1); 15268);
 Declared Emergency (Sec. 21080(b)(3); 15269(A));
 Emergency Project (Sec. 21080(b)(4); 15269(b)(c));
 Categorical Exemption. State type and section number: 15330, Class 30
 Statutory Exemptions. State code number: _____
 General Rule (Sec. 15061(b)(3))

Exemption Title: Actions to prevent, minimize, stabilize, mitigate or eliminate the release or threat of release of hazardous waste of hazardous substances during excavating and offsite disposal of impacted soils at the site.

Reasons Why Project is Exempt:

1. The project is consistent with Class 30 as a minor cleanup action taken to prevent, minimize, stabilize, mitigate, or eliminate the release or threat of release of a hazardous waste or substance and will cost \$1 million or less.
2. None of the exceptions in title 14, section 15300.2 apply to the project. The site is not on the Hazardous Waste and Substances Sites List pursuant to Government Code section 65962.5. The site is not in a known area of biological or cultural resources
3. The project will not result in significant impact to the environment because of the following controls that are include in the approved workplan and are required to be implemented:
 - a. Dust suppression measures (covering and/or watering the soil stockpiles) will be conducted during demolition and excavation activities. Storage pile covers with sand bags hold-downs will be used on the external clean fill stockpile to prevent storm water runoff and general migration of the stockpile.
 - b. All project activities will be conducted pursuant to the means and methods described in the IM Workplan and consistent with the HASP. The IM Workplan contains the HASP, which incorporates DTSC, Cal OSHA and Federal worker health and safety regulations. The workers will be trained for hazardous waste handling and properly equipped for the impacted soil to be handled
 - c. Work activities will be conducted on weekdays 7 a.m. to 5 p.m. Transport departure times will be scheduled so as to avoid peak commuter traffic.
 - d. All trucks will be decontaminated prior to leaving the facility. Based on the facility location and the selected transportation, no specific traffic control measures would be necessary. The trucks will exit the facility going east on West Sherman Avenue, turn right (south) on South Broadway, turn right (west) on West Albertoni Street, turn right (north) on South Vermont Avenue, and turn right (east) on West Artesia Boulevard. The trucks will enter the 110 Freeway southbound and travel to the 405 Freeway, merge onto the 405 Freeway northbound to the 5 Freeway, and merge onto the 5 Freeway and continue to the final disposal destination facility.
 - e. Appropriate permits will be obtained from the City of Carson, the LADPW and any other applicable agency.
 - f. Air permits will not be required. Rule 1166 will not apply based on the limited VOC levels. Best Available Control Measures from Table 1 of Rule 403 will be implemented for particulates. Emission estimates from diesel tractor/trailers were calculated for transportation. Based upon 50 trucks/day, the NOx emission rate would be 2.08 lbs/day, which is well below the emission threshold of 125 lbs/day level requiring mitigation measures in the SCAQMD CEQA Air Quality Handbook for air impact during the transportation.

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Lead Agency Contact Person

Phone #

Original Signed by Stephen Lavinger

1/22/07

DTSC Branch Chief Signature

Date

Supervising Hazardous Substances
Scientist II, Tiered Permitting Corrective
Action Branch

Stephen W. Lavinger

DTSC Branch Chief Name

DTSC Branch Chief Title

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Date Received For Filing and Posting at OPR: _____