

DRAFT
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
Landfills Team
9211 Oakdale Avenue
Chatsworth, California 91311

Project Title: Post Closure Permit for former Baron Blakeslee facility

Project Location: Former Baron Blakeslee Facility, 8333 Enterprise Drive in Newark, California 94560-3307

County: Alameda

Project Description:

The Department of Toxic Substances Control (DTSC) is proposing to issue a post-closure permit for former Baron Blakeslee facility (Facility). Honeywell International Inc. is the Operator of the Facility, which is owned by the Gallade Chemical Enterprises, LLC. Pursuant to the authority granted under sections 25150, 25159 and 25159.5 of the California Health and Safety Code, the permit is for the post-closure care of the closed hazardous waste storage and treatment facility. The Facility is subject to post-closure because required DTSC clean-up standards could not be met during closure activities. The post-closure permit will require the owner/operator to continue requirements of the California Regional Water Quality Control Board (RWQCB) Site Cleanup Requirements SCR Order No. R2-2007-0005 dated January 29, 2007 and any subsequent revisions made by RWQCB and other requirements imposed by DTSC. The post-closure permit requires the continued quarterly or semi-annual groundwater monitoring of the nine RCRA groundwater monitoring wells, measuring the depth to ground water in groundwater wells, inspect, repair, maintain and report on the integrity and general condition of the wells, and report vapor gas soil sampling results.

Background:

During late 1972 through early 1973, the site was developed by the BBI division of Purex Corporation. Operations began on December 1, 1974. Operations at the site included storage and distribution of virgin chemical products. In 1985, BBI began onsite recovery of chlorinated and fluorinated solvents from waste liquids. In April 1993, BBI ceased its solvent recovery operation. In November 1993, BBI proceeded to close four hazardous waste management units (HWMUs) (the Container Storage Area, the Container Staging Area, the Waste Pump-out Area, and the Brighton Still Assembly and associated process area) in accordance with its Resource Conservation and Recovery Act (RCRA) Part B operating permit requirements. Closure activities were initiated in November 1993 in accordance with an approved Closure Plan under the Part B permit. The HWMUs were cleaned and closed according to DTSC requirements with the exception that investigations of impacted soil and groundwater were continuing under the direction of the Regional Water Quality Control Board, San Francisco Region.

Since 1998, Gallade has operated a virgin chemical distribution center on the property that is not associated with the former hazardous waste facility permit-regulated units.

Operators

Baron Blakeslee Division was originally a division of the Purex Industries, Inc. In 1978, Purex Industries, Inc. was incorporated in Delaware and acquired all of the stock of Purex Corporation. In 1982, the assets and liabilities for the Baron Blakeslee Division (of Purex Corporation) were transferred to BBI, a Delaware Corporation. BBI then executed an agreement assuming all liabilities relating to the former Baron Blakeslee Division. Purex Industries, Inc. became the parent company of both BBI and Purex Corporation. In 1984, Purex Industries, Inc. sold BBI to Allied Corporation. Allied Corporation consolidated with The Signal Companies Inc. in 1985 to form Allied-Signal Inc., and merged into AlliedSignal Inc. in 1987. AlliedSignal Inc. merged with Honeywell Inc. in 1999, and the combined entity is now known as Honeywell International Inc. (Honeywell).

Responsible Party

Honeywell is named as the discharger on the Water Board adopted Site Cleanup Requirements (SCR) Order No. 95-132 and retains liability due to operations by its predecessor companies. However, Honeywell has no connection or control over current site operations conducted by the current owner, Gallade Chemical.

Ongoing Corrective Action Activities

The ongoing corrective action activities are conducted in accordance with SCR Order No. R2-2007-0005. Following are the main corrective action activities stipulated in the SCR Order:

- Clean up the dense nonaqueous-phase liquid-impacted source zone soil and groundwater in the Former Tank Farm area by in-situ thermal technology.
- Clean up offsite sitewide groundwater by ISCO.
- Remove impacted shallow soil beneath the Former Process Building footprint when site operations cease and building will be demolished.

The remedial design for the in-situ thermal treatment of dense nonaqueous-phase liquid zone in the Former Tank Farm Area has been completed and approved by Water Board, and the construction is currently underway in accordance with Water Board-approved work plan. The Full-scale ISCO Implementation workplan was submitted to the Water Board in June 2009 and approved in August 2009. The contacting process is currently ongoing and the design is planned to be completed in early 2010 for remediation to begin in March 2010.

Honeywell conducts groundwater monitoring, and remediation for the entire facility pursuant to requirements of the RWQCB, SCR Order No. R2-2007-0005. In accordance with Senate Bill (SB) 1082, oversight of the corrective action at the facility and authority for implementing the requirements of the groundwater monitoring program lies with the RWQCB. Additionally, SB 1082 provides that the requirements for monitoring regulated units can be enforced through Water Board orders so that duplication of effort is avoided by the State. Since the entire facility is covered by the corrective action specified in the SCR Order, the compliance monitoring conducted for the shallow aquifer as related to the closed HWMUs should be considered as a "Corrective Action Monitoring Program".

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

Name of Person or Agency Carrying Out Project: Honeywell International 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: [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) - No possibility of significant effect on the environment.

Reasons Why Project is Exempt: The proposed project will have no significant effect on the environment, because:

- 1) No significant disturbance will occur since the groundwater monitoring wells are already in place and currently part of the RWQCB monitoring program;
- 2) Currently the RWQCB, as the lead agency, has undertaken clean-up of site-wide soil and ground water for the Solid Waste Management Units (SWMUs) at the Facility. As a result of remediation activities, DTSC believes that the cleanup is significantly reducing the threat to human health and environment. DTSC post closure permit is limited to Corrective Action Monitoring Program. The post closure permit will require sampling and analyses of groundwater for wide variety of components in 9 wells quarterly or semiannually.
- 3) The proposed groundwater monitoring will not affect the ongoing groundwater investigation/remediation by RWQCB; and will assure that the on-going cleanup under the RWQCB authority will not be impaired;
- 4) The Facility is secured with fencing and locks, and restricted to public access;

- 5) There are no known historical features or cultural resources located at the Facility;
- 6) The monitoring well locations are not in an area of biological significance and do not contain critical habitat for sensitive, threatened, or endangered species;
- 7) Although the site is on the Hazardous Waste and Substances Sites List, pursuant to Government Code section 65962.5, the corrective action for the Facility is being conducted by RWQCB which includes measures to remediate the facility's groundwater contamination.

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Project Manager Name	Project Manager Title	Phone #

Team Leader Signature	Date
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Peter Bailey	Landfills Team Leader	(916) 255-3602
Team Leader Name	Team Leader Title	Phone #

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