

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
Southern California Permitting & Corrective Action
9211 Oakdale Avenue
Chatsworth, CA 91311

Project Title: Closure Plan for Southern California Edison Company, Ormond Beach Generating Station

Project Location: 6635 South Edison Drive, near Oxnard, California 93033

County: Unincorporated Ventura

Project Description: The regulated closure of three former hazardous waste storage retention basins and associated pipelines by treatment of groundwater.

Background:

In 1995, Southern California Edison (SCE) signed an agreement with the DTSC to clean close the surface impoundments at eleven generating stations in Southern California. This was in accordance with conditions set out in the Final Judgment and Stipulation Number 121219 handed down by the Superior Court of California. The Stipulation alleged that SCE had stored hazardous wastes in the surface impoundments without a permit. The Ormond Beach Generating Station is one of the facilities cited in the agreement.

The former SCE Ormond Beach Generating Station is an approximately 37-acre facility currently owned and operated by Reliant Energy, Incorporated. SCE sold the Ormond Beach Generating Station in 1998, but retained responsibility under the contract of sale for environmental liability associated with past operation of the retention basins during the period of SCE's ownership. The retention basins are open, aboveground level, and located at the north end of the site. They typically store non-hazardous wastewater containing oil, grease, and suspended solids. Historically, the basins were occasionally used to temporarily store (less than 30 days) boiler chemical cleaning wastes that contained metals, and acidic solutions from the removal of corrosion and mineral deposits from the boiler tubes. The North and South retention basins were used to temporarily store boiler chemical cleaning wastes prior to the late 1980s. The Boiler Chemical Cleaning Basin (BCCB), constructed in 1989, was subsequently used to temporarily hold the boiler chemical cleaning waste. SCE discontinued the practice of storing hazardous boiler chemical cleaning wastewater in the retention basins during the late 1980's. No hazardous waste was stored in the retention basins and appurtenances during the period of characterization (1996-2006). In addition, the retention basins themselves have been cleaned approximately once per year, as needed by the current owner (Reliant Energy). It should be noted that SCE is closing the Hazardous Waste Management Units, but is not physically closing the retention basins, which are necessary for continued operation of the station.

The three retention basins and their associated pipelines and appurtenances (e.g. sumps) are the hazardous waste management units (HWMUs) that are subject to this closure plan. Non-hazardous wastewater containing condensed steam, plant wash water, oil, grease and suspended solids is stored in the retention basins and then tested for compliance with the provisions of a National Pollutant Discharge Elimination System (NPDES) permit (No. CA0001198) before discharge to the Pacific Ocean. The North and South Basins were installed in 1972. They were originally constructed with a single asphaltic concrete liner. In 1986, both basins were retrofitted with a single layer of synthetic liner (HDPE) installed over the existing asphalt liner. In 1989, the BCCB was created by partitioning the northeast corner of the North Basin with concrete walls. The BCCB is double lined with HDPE and has a leachate collection system installed between the two layers of liner material.

The retention basins were serviced by separate boiler acid wash, fireside wash systems, and a pipeline associated with the boiler water treatment facility. The three pipelines conveyed all the wastewaters to a common sump. The commingled wastewater from the common sump was then conveyed to the retention basins via a single ten-inch diameter pipeline.

Normal operation of the active generating station over the period of approximately 14 to 18 years [since hazardous wastes were last stored in the basins] has allowed wastewater to continuously flow through the pipelines leading to the retention basins. Due to the operational flow, there should be no sediments from this period remaining in the pipelines. However, the common sump connected to the pipelines and basins potentially could contain residual sediments from the period when hazardous wastes were stored in the basins. Decontamination procedures will include: inspection, solids removal, pressure washing, and confirmation sampling of the washwater and solids. Decontamination washwater and solids will be removed and properly disposed, based on the results of the analytical testing.

The retention basin site is underlain by a perched aquifer, leaky clay aquitard, and the Oxnard aquifer. The Regional Water Quality Control Board's Basin Plan indicates that the existing beneficial uses for the Oxnard Sub-basin are Municipal, Industrial Process, and Agriculture. However, Ventura County considers the groundwater contained in this aquifer to be non-potable because of possible sea-water intrusion.

Site Investigation:

Field investigations have been conducted in and around the retention basin site from 1996 to 2006, in order to characterize soil, soil gas, and groundwater in areas where historical operations may have led to contamination. Volatile organic compounds were not detected by Method 8260B in soil matrix samples from the site. The soil vapor survey detected very low levels of volatile organic compounds at two locations along the pipelines. Elevated concentrations of 1,4 dioxane were detected in groundwater samples from the site.

The groundwater monitoring well network was extended outward from the retention basin site until a significant attenuation of contaminant concentrations (approaching background levels) was observed. Groundwater monitoring has been conducted quarterly since 1996. However, in order to select an appropriate time period for groundwater data evaluation, groundwater samples collected during the last six years (2001 to 2007) will be used for risk evaluation. Five hundred eighty-four groundwater samples from 21 monitoring wells in the exposure area were collected during the period of December 1996 through March 2008. The data set demonstrates that the groundwater contaminant plume is considered stable, and has not migrated off-site.

The resulting characterization reports for soil, soil gas, and groundwater have been reviewed by DTSC. It has been determined that characterization of the retention basin site is complete and is sufficient to allow SCE to proceed with site remediation and closure.

Closure Performance Standards

The closure performance standards for the site will meet clean closure (unrestricted land use standards) following the site remediation. Clean closure can be achieved by either demonstrating that no contaminants of potential concern [COPCs] are identified at the retention basins site, or demonstrating that COPCs identified at the retention basin site were remediated to concentrations that are below background or risk-based criteria. For groundwater, the Closure Performance Standard for the 1,4 dioxane is the state notification level of 0.003 mg/L {State Water Resources Control Board, August 2008}. If the closure performance standards cannot be achieved, the site may be subject to Post Closure requirements, including but not limited to, a Land-Use Covenant (LUC) and Implementation and Enforcement Plan (IEP). An additional CEQA evaluation may be required.

Summary of Closure Activities

The overall remediation strategy will be to use SCE's characterization data, statistical analyses, and risk assessments to identify the specific contaminants and locations that require remediation to achieve the site's closure performance standards.

Groundwater

Contaminated groundwater at the site will be remediated by a pump and treat approach using granular activated carbon. Based on previous discussion with the Los Angeles Regional Water Quality Control Board, it appears the only acceptable method of discharge will be through injection of the treated water into the subsurface via a gravel-filled trench.

The pilot test showed that a pumping rate as low as 1-2 gallons per minute in the three affected monitoring wells would be sufficient to capture the 1,4 dioxane plume. This pumping rate will not affect water levels in the adjacent wetlands. Monitoring wells located between the treatment area and the wetlands will be continuously monitored. The pilot test also demonstrated that granular activated carbon was effective at treating the groundwater to remove the 1,4 dioxane.

The proposed method of discharge will be via injection of treated waters into the subsurface. The infiltration trench will be located on the south side of the north basin within operating property boundaries. The trench will be less than 100 feet in length, three feet wide and three feet in depth. The trench will be backfilled with 2 feet of gravel, small diameter sewer leachline piping, and one foot of topsoil for cover with a plastic barrier between the soil and gravels. Small diameter piping (3 inches or less) will be connected to the nearby treatment skid.

It is anticipated that the system will operate for approximately 2 ½ years. Ongoing groundwater monitoring will serve as confirmation sampling to evaluate the efficacy of the treatment chemicals on meeting the site's closure performance standards for groundwater [state notification level of (0.003 mg/L)]. Groundwater samples will be collected and analyzed according to the existing Water Quality Monitoring Program and Sampling and Analysis Plan. Follow-up compliance monitoring is anticipated to last from three to five years, assuming three years of required quarterly monitoring.

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

Name of Person or Agency Carrying Out Project: Southern California Edison

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: [Title 14, Section 15330;CCR]
 Statutory Exemptions: [State code section number]
 General Rule [CCR, Sec. 15061(b)(3)]

Exemption Title: Title 14, section 15330, California Code of Regulations. Minor Actions to Mitigate or Eliminate the Release of Hazardous Waste or Hazardous Substances

Reasons Why Project is Exempt:

The proposed physical closure operations described in the closure plan are isolated within the boundaries of the site, and will not result in significant effects to human health and the environment because:

- 1) The Project is a Minor Action to Mitigate or Eliminate the Release of Hazardous Waste or Hazardous Substances that meets the definition in section 15330 and will cost less than \$1,000,000.
- 2) The site is not on the Hazardous Waste and Substances Sites List compiled pursuant to Government Code section 65262.5.
- 3) The pump-and-treat system will use existing wells within the 1,4-dioxane groundwater plume.
- 4) The groundwater treatment pump and treat unit meets all current operating standards, and will not pose any threat to the local air quality.
- 5) The infiltration trench can be installed with minimal disturbance using a 3 foot wide backhoe. Appropriate temporary barriers will be set up to control any loose sediment during installation activities.
- 6) The only planned earth moving activities at the site (trench installation) is in a previously disturbed area within the basin areas. Therefore, no cultural resources would be impacted.
- 7) The volume of groundwater being extracted and re-injected will result in a zero net gain/loss and will not affect the adjacent wetlands.
- 8) Long term monitoring of the groundwater indicates that the plume is stable and contaminants of potential concern have not and will not migrate into the adjacent wetlands or the Pacific Ocean. The proposed groundwater treatment will not impact the groundwater flow patterns at the site.
- 9) Although special status species are known to occur in the Ormond Beach area, closure activities described in the closure plan have a minimal potential to impact sensitive biological resources. The project will take place within the perimeter of the fence line surrounding the facility in previously disturbed areas. One portion of the project area has a low potential to support salt marsh bird's beak (*Cordylanthus maritimus* spp. *maritimus*), however, the species was not observed during the biological survey. Standard SCE avoidance measures and best management practices will be implemented during project activities to avoid or reduce potential impacts to biological resources. These measures have been reviewed and concurred with by the Department of Fish and Game's field biologist's for the area.

- 10) The proposed closure plan activities will utilize DTSC's current methods of risk assessment which will conservatively evaluate the potential risk to groundwater resources.
- 11) The closure plan requires that risk levels for human receptors potentially exposed to the identified contaminants of potential concern, are within USEPA and DTSC prescribed standards for clean closure.
- 12) Volatile organic compounds, semi-volatile organic compounds, and polychlorinated biphenyls were not reported in soils at the site. Therefore, no soil removals are anticipated at the site.
- 13) The site is fully developed for industrial uses. The closest residence is over ½ mile away from the site and the project is not located within a scenic highway.

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Project Manager Name	Project Manager Title	Phone #

Branch Chief Signature	Date

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