

## 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  
Hazardous Waste Management Program  
8800 Cal Center Drive  
Sacramento, CA 95826

Project Title: Techalloy Company, Inc. Post-Closure Permit Renewal

Project Location: 2500 "A" Street, Perris, CA 92570

County: Riverside

### Project Activities

This project is a post-closure permit renewal which addresses ongoing activities including maintenance of three closed surface impoundment caps, corrective action, and groundwater monitoring. A closure plan for the waste water treatment system (WWTS) is incorporated in the post-closure permit because the unit no longer treats Resource Conservation and Recovery Act hazardous waste and is operated under a Permit By Rule (PBR) with Riverside County. The WWTS is planned to be in operation under PBR for the life of the facility. Techalloy must continue to conduct groundwater monitoring as necessary to comply with the requirements of the California Code of Regulations, Title 22, Division 4.5, Chapter 14, and Article 6.

The renewed post-closure permit would transfer corrective action oversight from the United States Environmental Protection Agency Consent Decree to the DTSC post-closure permit, shorten the original post-closure permit by replacing regulatory language in the permit with regulatory references, and authorize the applicant to change their Water Quality Monitoring and Response Program (WQMRP). All other conditions from the original post-closure permit will remain the same.

Techalloy will continue to post-closure care of the closed surface impoundments by inspection and maintenance activities. Inspection of the post-closure care area will be conducted to verify that the closure cap and runoff control system is in proper condition. If damaged, the closure cap and/or runoff control system will be repaired. The security system and the groundwater monitoring system (well heads) will also be inspected for evidence of tampering and/or damage during routine groundwater measurement and sampling events as described in the WQMRP. The details of the inspection of the post-closure care area are described in the Post-Closure Permit Plan.

Changes to the WQMRP will include the following:

1. Converting site status from Evaluation Monitoring to Corrective Action Monitoring.
2. Reduction in sampling from quarterly to semiannually but maintain groundwater level measurements quarterly.
3. Reduction of monitoring parameters.

### Background

The Techalloy Company, Inc. (Techalloy) operates a plant in Perris, California, Riverside County, which manufactures high-quality specialty stainless steel and nickel alloy wire for the aerospace and other related industries. The facility had three surface impoundments and a waste water treatment system (WWTS).

Prior to 1985, Techalloy evaporated their waste waters in three surface impoundments that were found to have leaked contaminants to the groundwater. The facility's operational permit allowed the following hazardous constituents in the waste stream: copper cyanide, hydrochloric acid, hydrofluoric acid, nickel compounds, nitric acid, potassium permanganate, sodium dichromate, sodium dichromate, sodium hydroxide, sulfuric acid, and zinc compounds. The surface impoundments were subsequently closed and are regulated by a 10-year RCRA Post-Closure Permit (first issued May 8, 1996).

When the surface impoundments were closed, the WWTS became operational. The WWTS was used to treat on site waste consisting of spent plating and etching solutions through a process of precipitation, filtering, and evaporation. The resultant liquid is evaporated through an evaporation tower and the filter cake is shipped off site for disposal. Until

recently, this process was governed by a Resource Conservation and Recovery Act (RCRA) permit. Through waste reduction and waste management changes, Techalloy was able to permit their on site WWTS activities under a PBR (issued August 8, 2002) through the County of Riverside. Techalloy was allowed to have their RCRA permit to expire (on August 13, 2002) because the WWTS no longer treats federally regulated hazardous waste. All federally regulated wastes are now shipped off-site for treatment and disposal. The risk associated with treating the federally regulated waste has been removed. The WWTS is planned continue to be in operation under PBR for the life of the facility.

Techalloy is a U.S. Environmental Protection Agency (U.S. EPA) Government Performance and Results Act (GPRA) site under U.S. EPA lead for Corrective Action. Corrective Action activities are conducted via a Federal court order between the facility and U.S. EPA. However, on July 10, 2006, Techalloy requested the termination of the Consent Decree with U.S. EPA. Techalloy submitted the Final Report Corrective Measures Implementation detailing its compliance to the terms of the Consent Decree. U.S. EPA and Techalloy must have a joint motion with the court to terminate the Consent Decree. Subsequent to termination of the Consent Decree, Techalloy will be under the oversight of DTSC regarding any corrective action.

There are three groundwater plumes at the site. The Metals plume and the Total Dissolved Solids and Nitrates plume are associated with the surface impoundments. The Benzene, Toluene, Ethylbenzene, Xylene (BETX) plume is associated with an underground storage tank that was removed in the past.

Techalloy is exempt from surface water monitoring and vadose zone monitoring. Surface water is present only briefly in localized low areas or depressions following periods of heavy rainfall. Flow in the San Jacinto River, south of Techalloy, is restricted to groundwater. Vadose zone is considered inappropriate for the site. Data collected during closure indicated that a release to vadose zone beneath the closure area had already occurred prior to closure.

### **Location**

Techalloy is located approximately 20 miles southwest of Riverside, California at 2500 A Street, Perris, California 92370, in an area zoned M-1 for industrial use. Techalloy occupies 101 acres is bounded on the north by Mapes Road, on the east by A Street, on the south by Watson Road, and on the west by River Road. South and southeast of the property is zoned as agricultural and is actively farmed. North and northwest of the property are zoned as residential/agricultural and is sparsely populated. There are no oceans, airports, landmarks, parks, interstates, transportation terminals, retail centers, institutions or hospitals located within a 0.5 mile radius around the facility.

### **Corrective Action**

In 1988, the U.S. EPA and Techalloy signed a Consent Decree No. CV 88 5859 IH dated December 29, 1988 (Consent Decree) for remediation of releases and corrective action at the facility per RCRA Section 3008(h) and 42 U.S.C. Section 6928(h). Subsequent to termination of the Consent Decree, Techalloy will be under the oversight of DTSC regarding any corrective action.

In June of 1998, U.S. EPA selected a pump and treat groundwater remedy which only addressed the Metals Plume. The remedy allowed the facility to process the low flow of groundwater in their on site treatment system. After two years with little effect on the apparently stable contaminant plume, in November 2001, U.S. EPA allowed the facility to shut down the groundwater pump and treat systems to study the effects of the pumping on the groundwater. Groundwater extraction was discontinued in January 2002. In April 2004, Techalloy completed four years of groundwater monitoring under the Corrective Measures Implementation program.

As for the other two groundwater plumes, the Total Dissolved Solids and Nitrates plumes contribute to a basin wide problem that the Water Board is studying and the BTEX plume is small and stable.

### **Recent Modifications to Post-Closure Permit**

On December 2, 2005, the Geology, Permitting, and Corrective Action Branch (GPCAB) approved a class 2 permit modification (requested April 7, 2005 and revised July 26, 2005) that releases Techalloy from RCRA financial assurance liability requirements for operation of its WWTS.

On April 25, 2006, the GPCAB approved a class 3 permit modification which makes a completion of corrective action determination ("termination") for 81 of the 101 acres of property at the facility. DTSC and Techalloy entered into a Land Use Covenant to restrict future land use on the remaining 20 acre parcel to industrial/commercial use. The 81 acres is to be developed by Jennings Land Company for housing. A Land Use Restriction Inspection Report was submitted on May 23, 2006.

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

Name of Person or Agency Carrying Out Project: Techalloy Company, Inc  
George Wood

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: [15301]  
 Statutory Exemptions: [State code section number]  
 General Rule [CCR, Sec. 15061(b)(3)]

Exemption Title: Permitting of an Existing Facility for Post-Closure

Reasons Why Project is Exempt:

This project is a post-closure permit renewal which addresses ongoing activities including maintenance of three closed surface impoundment caps, corrective action, and groundwater monitoring.

1. The facility is located in an area zoned M-1 for agricultural and industrial activities. The facility's operation should not be in conflict with zoning ordinances. A security chain link fence surrounds the closed impoundments and Techalloy facility to prevent humans and animals from entering the site. The location does not contain either cultural resources or protected habitats. Aesthetics, agricultural resources and biological resources will not be affected.
2. Air quality will not be affected by the project activities. There will be no air emissions emitted because the units involved in the project are closed/capped ponds and a waste water treatment system that no longer treats RCRA hazardous waste. Post-closure activities will consist of groundwater monitoring and maintenance of the ponds' closure cover. The waste material in the closed ponds are not volatile and the cap will eliminate the generation of fugitive dust.
3. The facility no longer treats hazardous materials. All federally regulated wastes are shipped off-site for treatment and disposal.
4. Geology and soils will not be affected by the project activities. Continued groundwater monitoring will occur using the facility's existing wells. There are no impacts to erosion. The site is protected from erosion by a cement slab surface within the confines of the work area, although there is a grass covered area located at the closed surface impoundment portion on the west side of the facility.
5. Hydrology and water quality will not be affected by the project activities. Water quality standards will not be violated. Only the WQMRP will be changed with the post-closure permit renewal. The WQMRP will be used to ensure compliance with the water quality protection standard. There are no impacts to drainage. There is a drainage "V" ditch around the closed ponds.
6. Project activities will not affect land use and planning. Techalloy and DTSC entered into a Land Use Covenant to restrict future land use on the remaining 20 acre parcel to industrial/commercial use. Population and housing are also not impacted.
7. Project activities will not cause an increase use of mineral resources, utilities, and services systems. There will be no increase to noise, transportation, and traffic.
8. There are no physical changes to the facility associated with this project. Public services and recreation are not impacted.
9. The facility has been inspected on May 23, 2006 and October 25, 2006 to check for the effectiveness of the facility's maintenance. No violations were found.
10. The facility is not on the Cortese list.

Peter Bailey  
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Project Manager Title

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Permit Renewal Team Leader Signature

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