

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: Toppan Electronics, Inc., Corrective Measures Workplan for Excavating Contaminated Soil

Project Location – Specific: 7770 Miramar Road

Project Location – City: San Diego

Project Location – County: San Diego

Description of Project:

The project is a Corrective Measures Workplan to excavate approximately 19,080 tons contaminated soil which resulted from past operations at the site. Metals contaminants in subsurface soil contain up to 5,170 mg/kg Copper, 218 mg/kg total Chromium, 1,340 mg/kg Lead, 31.5 mg/kg Arsenic, and 4,670 mg/kg Nickel.

Solvents contaminants that were detected in soil matrix samples beneath the facility include 1,1-dichloroethene (3.8 mg/kg); Methylene chloride (21 mg/kg); 1,1,1-trichloroethane (8.8 mg/kg); 1,2-dichloroethane (0.34 mg/kg); acetone (31.5 mg/kg); Toluene (2.2 mg/kg); Formaldehyde (7.2 mg/kg). In addition; soil gas samples found concentrations of the following constituents: 1,1-dichloroethene (34,000 ug/l); Methylene chloride (940 ug/l); 1,1,1-trichloroethane (1,100 ug/l). Ground water is not impacted at the site.

Background:

The site encompasses approximately 5.5 acres in an industrial zone. A two-story building of approximately 125,000 square feet is located on the site. The site is enclosed by a six-foot-high chain-link fence topped with barbed wire. The general site vicinity is highly developed, commercialized with no residences or other sensitive receptors located within an approximately 0.4-mile radius of the site, with the exception of a business that conducts gymnastic training. Toppan formerly manufactured printed circuit boards for various markets. Toppan engaged in the management of hazardous waste during previous operations at this facility.

Approximately 19,000 square feet of the existing building will be demolished to facilitate excavation prior to implementation of the corrective measures. The building has been previously decontaminated if necessary and samples to verify have been taken to verify that demolition material will not be hazardous waste. This material will be shipped off site prior to commencement of the Corrective Measures Workplan as non-hazardous demolition waste. The portion of building and all structures will be demolished under applicable County of San Diego permits. Applicable San Diego Air Pollution Control District (SDAPCD) guidelines for fugitive dust control and County of San Diego and Regional Water Quality Control Board guidelines for storm water pollution prevention will be followed accordingly.

Following remediation, the site is proposed to be redeveloped for industrial use. Backfill and redevelopment will occur after the completion of the Corrective Measures Workplan under local government jurisdiction.

Project Activities:

- The project is to excavate and dispose approximately 19,080 tons contaminated soils offsite. Because there may be some residual contamination, this volume also includes the cement slab foundation of the building to be demolished. Cleanup goals for the site are:

Milligrams/ Kilogram in Soil

Lead,	300
Nickel	250
Total Chromium,	31
Arsenic	11.4
1,1,1-trichloroethane	470

1,1-dichloroethene	24
Methylene chloride	74
Vinyl chloride	085

- Soils contaminated to hazardous levels will be excavated and properly disposed at Clean Harbors Buttonwillow Class 1 Hazardous Waste Disposal Facility in Buttonwillow City, CA or Copper Mountain Landfill in Welton City, AZ as described further below
- Soil vapor monitoring will occur for a period expected to range between 1-5 years. Implementation of the soil vapor monitoring program, consisting of approximately four semi-permanent, multi-depth, soil vapor monitoring probes. Monitoring results will document that concentrations of Volatile Organic Compounds (VOCs) in soil vapor remain stable or are decreasing. The Department of Toxic Substances Control (DTSC) will concur with this result prior to allowing the program to cease
- Land use controls, consisting of a deed restriction, will be instated to ensure that land use is limited to commercial/industrial uses

To protect workers at the site and in the surrounding area, the excavation and confirmation sampling activities will be conducted in accordance with the DTSC-approved Corrective Measure Implementation Workplan and Health and Safety plan (CMI). An exclusion zone will be prepared and access will be controlled. The entire facility will be fenced, secured with warnings signs during demolition and excavation activities. Particulate monitoring and control of fugitive dust emissions and storm water run-off will be done during demolition and excavation to minimize potential exposure to on-site workers and the surrounding community.

Best Management Practices ("BMPs"), such as use of sandbag barriers, wind erosion control (various dust palliatives), street sweeping and vacuuming will be applied during site remediation activities to ensure that wind erosion is minimized and that sediment and that sediment carried by storm water runoff is retained on site. Suppression of dust will be performed by lightly spraying or misting the work areas with water, BioSolve®, or a similar surfactant. Misting may also be used on soil placed in the transport trucks. Efforts will be made to minimize the soil drop height from the excavator's bucket onto the soil pile or into the transport trucks. The excavator will be positioned so as to load or stockpile soil from the leeward side. After the soil is loaded into the transport trucks, the soil will be covered to prevent soil from spilling out of the truck during transport to the disposal facility. While on the property, all vehicles operators will be instructed to maintain speeds to less than 5 miles per hour for safety purposes and to minimize the creation of dust. If visible dust plum is present or dust concentrations exceed 500 ug/m³ at any time, operations at the site will be halted until dust can be adequately controlled.

Approximately 954 trucks (based on 20 tons per truckload) will be needed to transport the impacted soil. Approximately 30% of the total amount of excavated soil is assumed will be characterized as California Regulated or RCRA Hazardous and transported to Copper Mountain or to the Clean Harbors Buttonwillow facility. The potentially California Regulated or RCRA Hazardous characterized soils are assumed to generally consist of the shallow soil and will be excavated first. Assuming 20 truck loads per day, the California Regulated and/or RCRA Hazardous waste will be transported offsite in 14 days. For the remaining soil, assumed to be characterized as non hazardous and hauled to Otay Landfill, Inc., five trucks will be used in the transportation circuit resulting in an estimated roughly 20 truckloads transported offsite each day, for a total of approximately 34 days. The excavated soil will be temporarily stockpiled to allow for the soil to be profiled. The stockpiles will be underlain and will be covered with plastic to minimize possible dust and vapor emissions.

After the soil is appropriately profiled, the soil will be from the stockpile area into the end-dump trucks. While the soil is being loaded into the trucks, dust suppression will be performed by lightly spraying or misting the work areas with water. Efforts will be made to minimize the soil drop height from loader's bucket into the transport trucks. Additionally, the loader will be positioned so as to load or stockpile soil from the leeward side of the truck. After the soil is loaded into the transport trucks, the soil will be covered and otherwise contained to prevent soil from blowing or spilling out of the truck during transport to the disposal facility. Prior to exiting, the truck drivers will be required to brush their tires clean and remove any overburdened soil from areas of their truck that is not covered or protected. This cleanup/ decontamination area will be setup as close to the loading area as possible so as to minimize spreading the impacted soil. Before trucks leave the site, the removal action contractor's site manager will be responsible for inspecting each truck to ensure that the payloads are adequately covered, the trucks are cleaned of overburdened soil, and the soil is properly manifested.

Excavated soil characterized as RCRA hazardous waste will be transported to Clean Harbors – Buttonwillow Facility. The trucks will exit the site by turning right (west) on Miramar Road. They will travel approximately 3 miles to the I-805 (Inland Freeway) to junction of I-5 (Golden State Freeway). Excavated soil characterized as California regulated waste will be

transported to Copper Mountain Landfill. The trucks will exit the site by turning right (west) on Miramar Road. They will travel then approximately 3 miles to the I-805 (Inland Freeway), travel south on the I-805 for 15 miles to I-8 (Mission Valley Freeway). Excavated soil characterized as non-hazardous will be transported to Otay Landfill, Inc. Facility. The trucks will exit the site by turning right (west) on Miramar Road. They will then travel approximately 3 miles to the I-805 (Inland Freeway).

A confirmation sampling will be conducted for both metals and VOCs after excavation to ensure that the contaminants have been removed to the health based risk criteria (RBCs) stated above, as approved by DTSC on June 14, 2006, in the Baseline Risk Assessment dated May 5, 2006.

Name of Public Agency Approving Project: DTSC

Name of Person or Agency Carrying Out Project: Toppan Electronics, 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: _____
 Statutory Exemptions. State code number: _____
 General Rule (Sec. 15061(b)(3))

Exemption Title: With Certainty, No Possibility of a Significant Effect on the Environment.

Reasons Why Project is Exempt:

The project is short term removal action to eliminate the threat of release of hazardous substances by excavation and offsite disposal of the contaminated soils and thereby reduce potential risk for future site occupants at the site. The removal activities will not cause a significant effect on the environment because of the following:

1. The location of the site is in industrial environment. Surrounding land use is also primarily industrial. The waste material will be stockpiled areas and covered in a fenced area. There are no schools or residences within a quarter mile radius of the property boundaries.
2. Dust suppression measures (covering and spraying water on stockpiles) and monitoring of particulate air emissions will be conducted during demolition and excavation activities. Sand bags will be used around the treatment and excavation area to prevent storm water runoff and general migration of stockpile material. No additional stationary sources of air emissions are required for this project. Temporary mobile sources include operation of standard excavation and soil handling equipment, including an excavator, a backhoe, a front end loader, a soil screen, and a series of dump trucks. The dump trucks would be used to transport excavated soil off-site for disposal and import clean soil for backfill of the excavation. Mobile excavation equipment typically operate on diesel fuel. Based on a review of SDAQMD rules and contact with a representative of SDAPCD, no permit would be required. However, SDAPCD confirmed that the project must be in compliance with Rule 50, Visible Emissions, and Rule 51, Nuisance. Compliance with these rules require that if dust or VOCs exceed the criteria under these rules, that excavation or other soil handling operations be stopped until engineering controls could be implemented to achieve compliance. Engineering controls include using light water sprays on disturbed areas, covering haul trucks and soil stockpiles, and stabilizing surfaces.
3. Activities will be conducted pursuant to the means and methods described in the Corrective Measure Implementation (CMI) and consistent with the Health and Safety Plan provided in the CMI. The CMI includes a site health and safety plan that incorporates DTSC, Cal OSHA and Federal worker health and safety regulations requirements. The workers will be trained for hazardous waste handling and will be properly equipped for the material to be handled. All required permits necessary to implement the recommended corrective measure will be obtained from the appropriate regulatory authority with copies provided to DTSC prior to implementation of the selected alternatives. The following required permits will be obtained from the appropriate regulatory authority with copies provided to DTSC prior to implementation of the selected alternative to consist of the following:

City/County of San Diego

County of San Diego, Department of Environmental Health (DEH)- existing soil-gas well demolition
 Public Works and Building/Planning Department- building demolition only
 City of San Diego, Grading and Public Right-of-Way- soil excavation

City of San Diego, Traffic Division- traffic control

State of California

Division of Occupational Safety and Health (CalOSHA), Department of Industrial Relations–Notification of Excavation Activities per 8 CCT 341 1 (f)

- 4 Noise levels will comply with the City of San Diego Municipal Code, Section 59.5.0401, Sound Level Limits. Monitoring will be conducted to verify compliance. Excavation and operation of soil handling equipment work activities will be conducted on weekdays between the hours of 7 a.m. to 5 p.m.
- 5 Traffic control measures will be implemented to minimize disruption of traffic and potential threats to traffic safety resulting from the series of dump truck used to transport excavated soil from the site and imported backfill to the site. A traffic control permit will be obtained from the City prior to implementation. A traffic control plan will be prepared and submitted as part of the permit application process to describe detailed plans for traffic control. It is anticipated that the trucks will enter and exit the site from Miramar Road via the east and west gates, respectively. A flag person will be located at the site to assist the truck drivers to safely enter and exit the site. Appropriate signage will also be provided. Trucks will be staged on the property while loading activities are being conducted. While on the property, all vehicles will be required to not exceed 5 miles per hour for worker safety purposes and to minimize generation of dust. The trucks will exit the property to Miramar Road. As the trucks leave the site, the flag person will assist the truck drivers so that they can safely merge into the westbound traffic.
- 6 All trucks will be decontaminated prior to leaving site. The trucks will follow the designated routes as specified in project activities section above. Work activities will be conducted on weekdays between the hours of 7 a.m. to 5 p.m. Shipment departure times will be scheduled so as to avoid peak commuter traffic.
- 7 Groundwater is more than 100 feet below any detected contaminants at the site and will not be affected by the removal action or any residual contaminant levels.
- 8 No biological or cultural resources are known to exist at this location.
- 9 The site is not on the Hazardous Waste Substances Site List pursuant to Government Code Section 65962.5.

Nirupma Suryavanshi
Lead Agency Contact Person

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Phone #

Original Signed by Nirupma Suryavanshi

12/15/06
Date

DTSC Branch Chief Signature

Supervising Hazardous Substances
Scientist II, Tiered Permitting Corrective
Action Branch

Stephen W. Lavinger
DTSC Branch Chief Name

DTSC Branch Chief Title

TO BE COMPLETED BY OPR ONLY

Date Received For Filing and Posting at OPR: _____