CALIFORNIA ENVIRONMENTAL QUALITY ACT
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
Site Mitigation and Restoration Program
9211 Oakdale Avenue
Chatsworth, California 91311

Project Title: Former Witco Chemical Facility Removal Action Workplan

Project Location: 2601 East Imperial Highway, Lynwood

County: Los Angeles

Project Applicant: California Department of Transportation (Caltrans)

Approval Action Under Consideration by DTSC: Removal Action Workplan

Statutory Authority: California Health and Safety Code, Chapter 6.8

Project Description: The purpose of the project is to mitigate the low levels of total petroleum hydrocarbon (TPH) and volatile organic compound (VOCs)-impacted groundwater through monitored natural attenuation. Under this alternative, a groundwater monitoring and reporting program would be implemented to demonstrate that contaminant concentrations continue to decrease and to verify that the plume is stable, declining, and not migrating off-Site. The recommended alternative also includes provisions to remove light non-aqueous phase liquid (LNAPL) from the groundwater if it is observed in the future. The project also includes engineering and administrative controls, such as perimeter fencing and a Land Use Covenant (LUC). The project will reduce the risk posed to human health and the environment by subsurface contaminants in groundwater.

Background: The Site is located at 2601 East Imperial Highway in the City of Lynwood, California (City), near the intersection of Imperial Highway and Alameda Street. The Site encompasses two vacant parcels transected by Imperial Highway. Approximately 1.1 acres of the Site lies to the north of Imperial Highway (North Parcel) and the remaining 2.4 acres lies to the south beneath an elevated portion of the Glenn Anderson Freeway (South Parcel). The Site is in a predominantly commercial/industrial setting and is bounded by the former Magnetek property to the north, Santa Fe Avenue to the east, Philadelphia Way to the south, and Alameda Street and the Alameda railway corridor to the west.

The Site was formerly owned by the Witco Chemical Company/Witco Chemical Corporation, a chemical manufacturing company. Facility operations at the Witco property predominantly consisted of manufacturing ink, paints, and lacquers from 1947 until approximately 1981. According to the 1996 historic Site records, the Witco facility contained up to 55 storage tanks (both underground and aboveground), which reportedly stored toluene, xylene, mineral spirits, paraffin oil, fuel oil, tall oil, red oil, octoic acid, naphthenic acid, lead and cobalt naphthenates, copper and cobalt wash solvents, and zinc sulfate (Kleinfelder, 2002). In 1971, Caltrans purchased the Witco Chemical Company parcel to realign Imperial Highway and construct Interstate 105 (Glenn Anderson Freeway). Caltrans leased the property back to Witco until 1981. In 1987, Caltrans identified and removed nineteen underground storage tanks (USTs) from the western half of the Site. The depth of the deepest UST bottom was reported at 17 feet below ground surface (bgs).

On behalf of Caltrans, Kleinfelder completed a geophysical survey in 2000 and found no evidence of additional USTs or associated piping on the Witco Site. Analytical results from soil samples collected during and after the removal of the USTs indicated that the USTs and/or associated piping had leaked and impacted soil underlying the Site. Adsorbed phase petroleum hydrocarbons in vadose zone soil were found to extend from approximately 5 feet bgs to the perched groundwater zone at approximately 30 feet bgs in the vicinity of the USTs (Alton, 1993). In addition to petroleum hydrocarbons, metals and polychlorinated biphenyls (PCBs) were reported in shallow soils at the Site.

Since 1982, numerous Site investigations and remedial actions have been performed by Caltrans to address the reported soil and groundwater contamination at the Site. Investigations indicated that TPH, VOCs, metals, polychlorinated biphenyls (PCBs), and LNAPL had impacted soil and groundwater at the Site.

Several interim remediation measures including impacted soil excavation and disposal, impacted soil and groundwater treatment, and LNAPL removal and disposal, have addressed the majority of the Site chemical impacts. In 1994, during the I-105 freeway expansion and the realignment of the Imperial Highway, Caltrans removed a large majority of the TPH, metals, and PCB-impacted soil. In 2017, a second soil excavation was conducted under the oversight of the United States Environmental Protection Agency (US EPA) to remove additional PCB-impacted soil on the northern parcel. In 1996 a soil vapor/groundwater extraction system was constructed at the Site to treat TPH and VOCs found in the soil and groundwater, which operated until 2004. In 1997, LNAPL removal activities were initiated, and continued until 2018. LNAPL has not been present in any of the Site monitoring wells since November 2018 (Geosyntec, 2019a). Because of

the remaining low concentrations of VOCs and TPH present in groundwater, it will be necessary to monitor the natural attenuation as a cleanup process.

Project Activities: The RAW considered the previous investigations conducted at the Site, current Site conditions, and objectives related to protecting human health and the environment. The preferred alternative includes monitoring groundwater to confirm that the low levels of VOCs and TPH are not migrating off-Site and continue to naturally attenuate. The recommended alternative also includes provisions to remove LNAPL from the groundwater if it is observed in the future and implement controls to restrict public access to the Site. If the site is developed for public use in the future, additional assessment will be required to confirm there are no risk to human health. If any unacceptable risks are identified, additional mitigation measures will be implemented.

As described in detail in Section 6, the following administrative controls will be implemented:

- Signs will be posted on the fencing to deter the public from entering the Site. The need for signage will be reevaluated if the property is actively utilized by a future owner/tenant.

- A Land Use Covenant (LUC) for the Site will be developed by DTSC in conjunction with the EPA to minimize health risks if the Site were redeveloped in the future and as required by a condition of the USEPA's PCB cleanup approval, this alternative would include a LUC for the property, recorded with Los Angeles County, to restrict future use of the Site to industrial and/or commercial use.

- An Operation and Maintenance (O&M) Agreement between Caltrans and DTSC that contains provisions to ensure the long-term monitoring and O&M will be prepared.

- A Soil Management Plan will be developed to provide appropriate health and safety procedures and notifications for Site personnel working in areas of known soil impacts and to address how soil will be sampled, handled, and disposed of.

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

Name of Person or Agency Carrying Out Project: Caltrans

Exempt Status: Categorical Exemption: CCR Title 14, Sec. 15330

Reasons Why Project is Exempt:

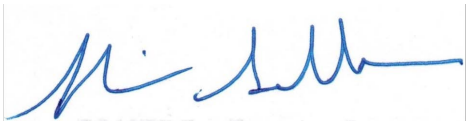
1. The project is a minor action designed to prevent, minimize, stabilize, mitigate, or eliminate the release or threat of release of hazardous waste or hazardous substances.
2. The project will not exceed $1 million in cost.
3. The project does not involve the onsite use of a hazardous waste incinerator or thermal treatment unit or the relocation of residences or businesses; and does not involve the potential release into the air of volatile organic compounds as defined in Health and Safety Code Section 25123.
4. The exceptions pursuant to California Code of Regulations, Title 14, Section 15300.2 have been addressed as follows:
    a. Cumulative Impact. The project will not result in cumulative impacts because it is designed to be a short-term final remedy that would not lead to a succession of projects of the same type in the same place over time.
    b. Significant Effect. The environmental safeguards and monitoring procedures that are enforceable and made a condition of project approval will prevent unusual circumstances from occurring so that there is no possibility that the project will have a significant effect on the environment.
    c. Scenic Highways. The project will not damage scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, because it is not located within a highway officially designated as a state scenic highway.
    d. Hazardous Waste Sites. The project is not located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.
    e. Historical Resources. The project will not cause a substantial adverse change in the significance of a historical resource at the Site because there are none at the Site.

The administrative record for this project is available to the public by appointment at the following location:

Department of Toxic Substances Control
Site Mitigation and Restoration Program
9211 Oakdale Avenue
Chatsworth, California 91311

Additional project information is available on EnviroStor:
www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=60000486

Contact Person	Contact Title	Phone Number
Chand Sultana	Environmental Scientist	(818) 717-6552

Approver's Signature: 

Date: 06/09/2020

Click or tap to enter a date.

Approver's Name	Approver's Title	Approver's Phone Number
Haissam Y. Salloum, P.E.	Branch Chief	(818) 717-6538

TO BE COMPLETED BY OPR ONLY

Date Received for Filing and Posting at OPR:

Governor's Office of Planning & Research

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