

**CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION**

2020080214

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, CA 91311

Project Title: Removal Action Workplan, Former Productol Facility

Project Location: 10051 Romandel Avenue, Santa Fe Springs

County: Los Angeles

Project Applicant: Productol, Inc.

Approval Action Under Consideration by DTSC: Removal Action Workplan

Statutory Authority: California Health and Safety Code, Chapter 6.8

Project Description: The proposed removal activities include soil vapor extraction and air sparging followed by shallow soil excavation. The California Department of Toxic Substances Control (DTSC) determined remedial actions were required to address elevated concentrations of volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), and metals detected in soil, soil vapor, and groundwater at the former Productol, Inc. Facility (Site). This determination is based upon the findings of the Removal Action Workplan (RAW), including sample collection from the Site, sample evaluation, consideration of potential remedial methods for soil, soil vapor, and groundwater, and selection of the appropriate remedial measures to address the onsite contamination. DTSC has regulatory authority to approve the RAW, prepared by Waterstone Environmental, Inc. (Waterstone) and dated December 2, 2019, pursuant to Health and Safety Code section 25187 and 25200.14.

Background: The Site is a long, relatively narrow site oriented in a north-south direction. The main body of the Site is approximately 1,800 feet in length and 160 ft wide (southern portion is 100 feet wide). The Site is comprised of ten (10) parcels of land with separate Assessor Parcel Numbers (APNs) which total 9.13 acres. The Site is bordered by active oil field parcels and Romandel Avenue to the east, Telegraph Road to the south, active railroad lines to the west, and commercial properties to the north. The Site is currently vacant, and the entire perimeter is surrounded with a chain link fence.

The Site operated as a petroleum refinery from 1938 to 1947. Between approximately 1947 and 1992, the Productol facility produced alkylated phenol compounds including cresylic acid and naphthenic acid. The facility was essentially divided into three sections along the length of the property: naphthenic acid production and storage in the north; alkylated phenol production in the central section, and cresylic production, tank farm, and product drum storage in the south and southeast offshoot of the Site.

In 1999, Waterstone conducted an environmental characterization investigation to provide a screening assessment of the potential areas of impact across the former operation areas. This preliminary investigation included the collection of soil, soil vapor, and groundwater samples. Waterstone conducted a site-wide comprehensive environmental characterization investigation in 2007, and a follow-up data gap investigation in 2012, which provided an understanding of the lateral and vertical extent of the subsurface impact at the Site. In addition, a shallow soil investigation to support geotechnical activities was conducted in 2019.

Soil is impacted from past onsite operations. The most prevalent and highest concentrations of VOCs detected in soil are benzene and naphthalene. The most prevalent and highest concentrations SVOCs are 2-methylphenol and 4-methylphenol (isomers of cresol), 2,4-dimethylphenol, phenol, naphthalene, and 2-methylmaphthlene. The phenolic compounds are generally co-located and detected at similar concentrations. Lead, mercury, and arsenic are all detected in limited areas above their respective background concentration.

The primary chemical of concern in soil vapor is benzene. The highest concentrations of benzene were detected in the southern Cresylic Acid Plant and tank farm area, in close proximity to a former benzene UST (T-81). Other prevalent VOCs in soil vapor detected at elevated levels include naphthalene, ethylbenzene, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, and xylenes.

Groundwater impact is primarily from the presence of benzene and lower concentrations of other VOCs. Over the years, VOC concentrations have steadily decreased.

Project Activities: The overall goal of this RAW is contaminant source removal and treatment so that any additional necessary activities for site closure can be identified.

Scope:

- Treatment of soil and soil vapor in select areas of the Site with elevated VOC concentrations via the installation of a vapor extraction system.
- Treatment of groundwater at the Site with elevated VOC concentrations via the installation of an air sparge system.
- The proposed vapor extraction and air sparge system will consist of two separate remediation systems in two separate remediation compounds (north and south). For the pilot test that was performed in 2019, a total of five (5) identical well sets, (VEAS1 and MP1 through MP4) were installed. Four of the existing five well sets will be used for removal activities at the Subject Property for the southern area. Eight new nested well sets are proposed to be installed to complete the removal activities within the northern and southern areas. of the respective remediation compounds.
- The extraction system will consist of a 300 standard cubic feet per minute (SCFM) vapor extraction system with vapor treatment using thermal destruction, catalytic oxidation, and/or carbon adsorption. The treatment technology may vary throughout the process in order to maximize efficiency and minimize operational costs. Air sparging remediation will be optimized by selection of key wells and pulsing schedules based on monitoring data and groundwater concentration trends.
- Excavation and disposal at an offsite landfill facility of shallow soils with metals contamination which exceed cancer risk/non-cancer hazard levels using a 95% UCL for metals.
- During future redevelopment, placement of cap cover barriers (asphalt or concrete cover, concrete building foundations) across the surface of the Site.
- During future redevelopment, placement of vapor barrier beneath concrete slab of all buildings constructed on the Site to limit vapor intrusion into buildings.
- Clean fill will be imported to backfill the excavation if there is not enough available onsite soil remaining during the Site grading activities. The backfill will be compacted appropriately to meet geotechnical requirements amenable for future uses.
- Preparation and recordation of a deed restriction/Land Use Covenant (LUC) due to contaminants being left in place.

In the event biological, cultural or historic resources are discovered during project activities, work will be suspended while a qualified biologist or cultural or historical resource specialist assesses the area and arrangements are made to protect or preserve any resources that are discovered. If human remains are discovered, no further disturbance will occur in the location where the remains are found, and the County Coroner will be notified pursuant to Health and Safety Code, Chapter 2, Section 7050.5.

After all necessary removal actions are completed, a LUC will be required for the Site because chemicals of concern will remain in soil and soil vapor above unrestricted use (residential) standards. This land use restriction should include the requirement of a sub-slab vapor barrier for any proposed buildings on the Site along with the implementation of a Soils Management Plan to address any future contact with impacted soil that may occur during any development construction activities.

Implementability:

- Removal of metals in soil in excess of risk/hazard levels is implementable using standard excavation equipment and can be conducted prior to mass grading to reduce potential for exposure to construction workers.
- Would require management of VOC emissions and nuisance phenol odors in soils impacted with VOCs and SVOCs.
- Treatment of VOCs in deep soil, deep soil vapor, and groundwater is implementable using the combined vapor extraction and air sparge technology.
- Would require installation of a vapor extraction system in coordination with installation of air sparge system.

- Would require permitting through the SCAQMD for the excavation of VOC-impacted soils as well as for the operation of the vapor extraction system.
- Periodic sampling to monitor effectiveness of contaminant removal would be required.

Specific enforceable environmental safeguards and monitoring procedures will be made a condition of project approval to ensure that impacts to the environment are less than significant; these include an approved Excavation Plan, Health and Safety Plan, South Coast Air Quality Management District (SCAQMD) Rules 402 and 403 compliance, and Project Quality Assurance requirements, in addition to the NPDES.

Although not anticipated based on the previous activities at the Site, in the event biological, cultural or historical resources are discovered in the course of project activities, work will be suspended while a qualified biologist, cultural or historical specialist makes an assessment of the area and arrangements are made to protect or preserve any resources that are discovered. If human remains are discovered, no further disturbance will occur in the location where the remains are found, and the County Coroner will be notified pursuant to the Health and Safety Code, Chapter 2, Section 7050.5.

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

Name of Person or Agency Carrying Out Project: Productol, Inc.

Exempt Status: Common Sense Exemption [14 CCR, Sec. 15061(b)(3)]

Reasons Why Project is Exempt: DTSC has determined with certainty that there is no possibility that the activities in question may have a significant effect on the environment because the project would not result in "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance."

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

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

Additional project information is available on EnviroStor: <https://www.envirostor.dtsc.ca.gov/public/>

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Approver's Signature:



Date:

08/12/2020
Click or tap to enter a date.

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TO BE COMPLETED BY OPR ONLY

Date Received for Filing and Posting at OPR:

Governor's Office of Planning & Research

Aug 13 2020

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