

**NOTICE OF EXEMPTION**

**To:** Office of Planning and Research  
State Clearinghouse  
P.O. Box 3044, 1400 Tenth Street, Room 212  
Sacramento, California 95812-3044

**From:** Department of Toxic Substances Control  
Cypress Cleanup Branch  
5796 Corporate Avenue  
Cypress, California 90630

<b>Project Title:</b> Time Critical Removal Action Workplan, Naval Base Point Loma, Munitions Response Program Site 1		
<b>Project Address:</b> South of Gatchell Road and Woodward Road, Naval Base Point Loma	<b>City:</b> San Diego	<b>County:</b> San Diego
<b>Approval Action Under Consideration by DTSC:</b>		
<input checked="" type="checkbox"/> Removal Action Workplan	<input type="checkbox"/> Initial Permit Issuance	<input type="checkbox"/> Permit Re-Issuance
<input type="checkbox"/> Corrective Measure Study/Statement of Basis	<input type="checkbox"/> Permit Modification	<input type="checkbox"/> Closure Plan
<input type="checkbox"/> Remedial Action Plan	<input type="checkbox"/> Regulations	<input type="checkbox"/> Interim Removal
<input type="checkbox"/> Other (specify):		
<b>Statutory Authority:</b>		
<input type="checkbox"/> California H&SC, Chap. 6.5 <input checked="" type="checkbox"/> California H&SC, Chap. 6.8 <input type="checkbox"/> Other (specify):		

**Project Description:** The project involves approval of a Time Critical Removal Action (TCRA) Workplan which proposes the excavation, screening of contaminated soils, offsite disposal of contaminated material and backfilling of the former small arms firing range Munitions Response Program Site 1 (Site). The Site comprises three areas that previously served as firing lines and target areas, referred to as Areas 1, 3, and 5. The total combined volume of contaminated soil to be excavated will be approximately 710 cubic yards.

**Background:** The Site is a former small-arms firing range situated on the western side of Naval Base Point Loma (NBPL) that encompasses approximately 3.5 acres. The Site is bounded by the Point Loma Ecological Conservation Area (PLECA) on the east and west. The central area of the Site contains small commercial buildings and parking areas. Features associated with the former firing range are limited to an impact berm and supporting concrete wall located at the western end of the Site (Area 5) and an impact berm located at the eastern end of the Site (Area 1). Area 3, which lies between Areas 1 and 5, contains no discernible features but is an isolated location with elevated lead concentrations in soil.

The Extended Site Investigation risk assessment found unacceptable risks to human and ecological receptors from lead in and around the impact berm located at Area 5 and in soil at Area 3. Lead exceeded the Department of Toxic Substances Control (DTSC) residential screening level of 80 mg/kg in seven samples at Area 5 and in one sample near Area 3. The Navy plans to collect soil samples within the Area 1 berm at the beginning of the TCRA mobilization to determine if additional contaminated soil is present and if removal of contaminated soil is necessary to meet remedial action objectives.

**Project Activities:** The removal activities outlined in the TCRA Workplan to address lead in soil on the Site consist of:

- **Mobilization and Site Preparation:** All labor, equipment, and supplies needed to excavate and remove the contaminated soil and manage the site will be mobilized. Coordination with other contractors at the site will be conducted to ensure the location of the loading equipment and haul routes will not impact ongoing construction efforts. An office trailer and portable toilets will be provided for on-site personnel.
- **Delineation, Excavation, and Screening of Soil:** A handheld X-ray Fluorescence (XRF) analyzer will be used during field work to delineate excavation area boundaries of which lead will be the primary indicator for delineation. Approximately 710 cubic yards of lead-impacted soil will be excavated from Areas 1, 3, and 5 and power screened to remove bullets and metallic debris, which will then be recycled.
- **Confirmation Sampling and Waste Characterization:** The contractor will collect confirmation soil samples to determine that lead concentrations do not exceed DTSC residential screening levels. Waste characterization samples will be collected from screened soil that exceeds confirmation sampling residential screening levels.
- **Loading and Waste Disposal:** Following receipt of waste characterization analytical results, a waste soil profile will be prepared for landfill review and approval. Waste manifests will be obtained for government review and signature. Stockpiled soil will then be loaded into dump trucks for transportation and disposal. Hauling contaminated soil offsite will require approximately 6 trucks per day for between 8 and 10 days, for a maximum of 60 truck trips.
- **Backfilling and Site Restoration:** After confirmation soil sampling results are approved, excavation areas will be backfilled with clean soil from JEB Sand Gravel and/or Joseph Material located in Escondido and Vista, California,

respectively. The Site will be restored after backfilling and waste disposal is complete. Import of clean fill to the Site will require approximately 8 trucks per day for between 4 and 5 days for a maximum of 40 truck trips.

- **Demobilization:** Following completion of all the above-mentioned tasks, all construction equipment and facilities will be demobilized from the field site.

Navy Natural Resources staff will be consulted during the planning stages of the project because of the close proximity of removal activities to the PLECA on the east and west sides of the Site. Contractors will coordinate with the Navy Natural Resources staff for site inspections, training, and compliance with the base Integrated Natural Resources Management Plan. Site personnel will be trained during a tailgate training session on avoidance measures by Natural Resources staff. Field work will be coordinated to implement avoidance and minimization measures for threatened and endangered species, including vegetation clearing methods, excavation and screening and site restoration. Removal activities will be managed to minimize interference with, disturbance to, and damage of wildlife resources. Mobilization and field work were performed for this project during October and November 2020 to avoid the period from February 14 through August 31, which is the nesting season for the California Gnatcatcher: a federally listed endangered species that is present on NBPL in the peninsula region.

The primary activity that will generate airborne dust is expected to be the excavation and handling of contaminated soil. Dust will be primarily controlled at the work site using water spray application. Dust suppression will be provided during all truck loading activities by wetting the soil and spraying any visible dust with a water mist. Airborne dust monitoring will be conducted to measure potential exposures to airborne dust during soil excavation and handling. Airborne dust concentrations exceeding the action level will trigger the use of additional dust control measures.

In addition, Best Management Practices (BMPs) will be implemented to ensure soil and dust are controlled during all field activities. Construction and/or installation of temporary erosion and sediment control BMPs (e.g., silt fences, silt logs, sidewall sloping, dust control), diversion of storm water, and prevention of runoff will be performed. Silt fences and/or silt logs will be installed downgradient of each excavation area. They will also be installed downgradient of soil stockpiles where needed.

Entrances to each excavation area will be controlled to prevent unauthorized access during field work. To the extent practical, land surfaces outside the work area limits will not be disturbed. When trucks are loaded with soil, precautions will be taken to ensure that spillage does not occur (e.g., minimizing drop height, using a loading spotter). Additionally, the operators will be supervised and will not be allowed to overfill the loader buckets. Field personnel will visually inspect trucks prior to transportation to ensure that excess or loose material is cleaned from the outside of trucks.

Contingency measures will be provided for potential spills and discharge from handling potentially hazardous materials on site, such as refueling of equipment or leaks from heavy equipment. A spill kit will be located onsite in the event of a spill.

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

**Name of Person or Agency Carrying Out Project:** Naval Facilities Engineering Command - Southwest

**Exempt 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: [CCR Title 14, Sec. 15330]  
 Statutory Exemptions: [State Code Section Number]  
 Common Sense Exemption [CCR, Sec. 15061(b)(3)]

**Exemption Title:** Minor Actions Taken to Prevent, Minimize, Stabilize, Mitigate, or Eliminate the Release or Threat of Release of Hazardous Waste or Hazardous Substance.

**Reasons Why Project is Exempt:**

1. The project is a minor cleanup action to be taken to prevent, minimize, stabilize, mitigate, or eliminate the release or threat of release of a hazardous waste and substance.
2. The project is a removal action costing \$1 million or less.
3. The project will not be located on a site which is included on any list compiled pursuant to Cal. Gov. Code § 65962.5 (<http://calepa.ca.gov/sitecleanup/corteselist/default.htm>)
4. The project will not have a significant effect on the environment due to unusual circumstances.

- 5. The project will not result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway.
- 6. The project will not cause a substantial adverse change in the significance of a historical resource.
- 7. The project will not require onsite use of a hazardous waste incinerator or thermal treatment unit.
- 8. The project will not require the relocation of residences or businesses.
- 9. The project will not involve the potential release into the air of volatile organic compounds as defined in Health and Safety Code section 25123.6.
- 10. The cumulative impact of successive projects of the same type on the same place, over time, if there are any, will not be significant.
- 11. The project will be consistent with applicable State and local environmental permitting requirements.

Evidence to support the above reasons is documented in the project file record, available for inspection at:

Department of Toxic Substances Control  
 Site Mitigation and Restoration Program  
 5796 Corporate Avenue  
 Cypress, California 90630

DTSC EnviroStor website: [https://www.envirostor.dtsc.ca.gov/public/profile\\_report?global\\_id=37970016](https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=37970016)

Daniel Cordero Jr Project Manager	Senior Hazardous Substances Engineer Title	714-484-5428 Phone No.
		12-4-2020
Branch Chief's Signature		Date
A. Edward Morelan, PG, CEG Branch Chief	Environmental Program Manager I (Sup) Title	714-484-5440 Phone No.

**TO BE COMPLETED BY OPR ONLY**

Date Received for Filing and Posting at OPR: