

**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> Removal Action Workplan, Time Critical Removal Action, Solid Waste Management Unit 53 Storm Drain System, Naval Air Station North Island (DTSC 400105-47)		
<b>Project Address:</b> Naval Air Station North Island	<b>City:</b> Coronado	<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 will address radium-contaminated drain lines and catch basins at the southern corner of Building 341 on the Naval Air Station North Island (NASNI) which was identified as Resource, Conservation, and Recovery Act (RCRA) Solid Waste Management Unit 53 (SWMU 53) due to historical use of low-level radioactive luminescent paint. The Time Critical Removal Action (TCRA) proposes excavation and removal of the contaminated drain lines and associated structures, replacing the drain lines, backfilling, and restoring the pavement at SWMU 53.

**Background:** NASNI is located in San Diego County, California, southwest of the City of San Diego, on the tip of the Silver Strand peninsula. NASNI is bounded by the City of Coronado to the east, the Pacific Ocean on the south, San Diego Bay on the north, and the inlet of San Diego Bay on the west. Building 341, constructed in 1941, is located at the corner of Quentin Roosevelt Boulevard and 1st Street on NASNI. Building 341 was used for pneumatic and hydraulic component assembly and repair operations until 1995. A graphic arts photography laboratory was also operated in the building until the mid-1990s. Low-level radioactive luminescent painting of dials was conducted within the building in the 1940s and 1950s. The storm drain system collects water from the paved parking areas to the south and west of Building 341.

During a radiological survey, *Draft Removal Site Evaluation, SWMU 53, Storm Drain System, Outside Southwest Corner – Building 341* (July 22, 2019; prepared to support the planned demolition of Building 341), elevated gamma emissions from Radium 226 (226Ra) were detected in a small-diameter storm drain exiting the southern corner of the building, as well as in the associated catch basins. The 226Ra-impacted water entered the storm drain system from a sink or drain in the southwest corner of Building 341 via the small-diameter pipeline, and then mixed with stormwater captured from the asphaltic concrete parking lot located to the west of Building 341.

**Project Activities:** Project activities involve excavation of drain lines and soil located 1-foot below and on each side of the drain lines after removal of the surface cover and non-radiologically impacted overburden soil. The drain line is located approximately 2 feet below ground surface. Trenches will be excavated along the length of the pipe segment to visually inspect, survey, and remove the pipes. Pipe ends will be covered to prevent the spread of contamination. The trenches will be approximately 3 feet wide (minimum 1-foot laterally from each side of the pipe) and extend to 1-foot below the pipe depth. As the 226Ra-impacted soil is removed, it will be directly loaded into Navy-provided low-level radioactive waste (LLRW) bins then to trucks for off-site disposal. Soil samples will be collected every 10 feet along the bottom of the trenches and beneath each catch basin and manhole. Where practicable, piping will be removed intact. The excavated storm drainpipes are considered to be 226Ra-contaminated material and will be directly loaded into LLRW bins. If sufficient sediment is present within removed piping, a minimum of one representative sample will be collected for radiological analysis. Exposed ends of drain line remaining in-place will be scanned and swiped for total alpha and beta radiation. Confirmation soil samples will be collected from underneath the removed structures after the removal of the impacted soil and excavation is complete.

Areas showing results above the Project Action Level (PAL), 1.0 picocurie per gram (pCi/g), would require excavation of an additional 1-foot below the excavation bottom and 5 feet laterally in both directions of the sample location, or half the distance to the next adjacent sample location, and the collection of a confirmation sample at the new depth. This process will continue until either laboratory results show concentrations below the PAL or groundwater is encountered. Non-woven

geotextile material will be placed in the trenches following excavation, and after the trench surfaces are gamma scanned and samples are collected. The geotextile will act as a physical barrier between the existing material and the backfill material.

Import backfill material will consist of pea gravel and sand. Self-compacting pea gravel will be placed below the replacement pipeline and surrounding the replacement prefabricated concrete drain boxes. The imported sand will be placed above the pipeline up to 9 inches below grade. Six inches of crushed miscellaneous aggregate along with three inches of asphalt concrete will be placed on top of the sand.

Removal activities are estimated to last 2 to 3 weeks and require approximately 7 to 10 truck trips for hauling the contaminated soil offsite; an equal number of trucks will be needed for hauling import backfill material to the Site. Dust control methods will be implemented during earthwork and soil handling activities by wetting the work areas as needed in accordance with the Environmental Protection Plan (EPP). Prior to commencing earthmoving activities, air-monitoring stations will be set up upwind and downwind of the construction activity areas. Air monitoring will be performed in accordance with the Dust Control Plan included in the EPP. Visual monitoring will be conducted for airborne dust, and water will be applied as needed for dust suppression as specified in the EPP.

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

**Name of Person or Agency Carrying Out Project:** U.S Department of the Navy

**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:

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 Cypress Cleanup Branch  
 5796 Corporate Avenue  
 Cypress, California 90630

DTSC EnviroStor website: [[https://www.envirostor.dtsc.ca.gov/public/profile\\_report?global\\_id=37970011](https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=37970011)]

<u>Daniel Cordero Jr</u> Project Manager	<u>Hazardous Substances Engineer</u> Title	<u>714-484-5428</u> Phone No.
<u><i>A. Edward Morelan</i></u> Branch Chief's Signature		<u><i>January 6, 2021</i></u> Date
<u>A. Edward Morelan, PG, CEG</u> Branch Chief	<u>Environmental Program Manager I (Sup)</u> Title	<u>714-484-5440</u> Phone No.

**TO BE COMPLETED BY OPR ONLY**

Date Received for Filing and Posting at OPR:

**Figure 1: Site Layout and Storm Drain System**

