

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, California 95812-3044

From: Department of Toxic Substances Control
Brownfields and Environmental Restoration
5796 Corporate Avenue
Cypress, California 90630

Project Title: Former Brownies Cleaners

Project Location: 6571 Westminster Boulevard, Westminster

County: Orange

Project Applicant: HHT Westminster Investment Corporation

Approval Action Under Consideration by DTSC: Removal Action Workplan

Statutory Authority: California Health and Safety Code, Chapter 6.8

Project Description: The project involves the excavation and off-site disposal of approximately 550-775 cubic yards of tetrachloroethene (PCE) and trichloroethene (TCE) contaminated soil, soil vapor extraction (SVE), and backfill of the excavated areas with imported clean soil at the Former Brownies Cleaners site (Site) in the City of Westminster, California. The purpose of the project is to remediate soil and soil vapor to levels that no longer represent risk to human receptors and the environment based on current guidance and screening levels. Following soil removal and after operation of SVE for a period of six (6) months to one (1) year, risk will be re-evaluated. Certification and issuance of a "No Further Action" designation will be evaluated based on risk. Once completed, the Site will be developed with a mix of apartments and commercial/retail space.

Background: The Site is approximately 0.70 acres in size. The Site was undeveloped from 1879 through 1950; and developed with the existing structures in the mid-1950s. Tenants have since included: residential tenants (1964-Present) at 13956 at La Pat Place; Carl's General Repair and Taylor Automotive (1964-1975); SBS Quality Autos (1980-1997); A-Pros Auto and AVA (2000-2018); and West Coast Smog Check and TK Diesel and Auto Repair (2019 to present) at 6551 Westminster Boulevard; and Brownies Dry Cleaners/Suede and Leather Cleaners (1968-1992); American Appliance Rentals (1995-2010); Maico Medical Billing (2005); Venus Botanical Shop (2010-2016); and Andy Signs & Printing (2010-2019) at 6571 Westminster Boulevard (currently vacant). The Site is bounded by apartments to the north, a hotel to the east, Westminster Boulevard and commercial retail properties to the south, and La Pat Place, a liquor store, and apartments to the west. Surrounding land use is mixed residential and commercial.

Previous Investigations: A Preliminary Endangerment Assessment (PEA) Equivalent Report (Phase II Subsurface Investigation Report, Partner Engineering and Science, Inc., May 1, 2018; and Sub-Slab Vapor and Indoor Air Sampling Report, EEC Environmental [EEC], July 1, 2019) and a Supplemental Site Investigation (SSI) (EEC Environmental, August 4, 2020) were approved by DTSC on March 18, 2020 and September 20, 2020 respectively. The SSI concluded that limited areas of the Site's soil is contaminated with Volatile Organic Compounds (VOCs) and recommended to remove impacted soil to a proposed depth of approximately 8 feet below ground surface (bgs) in certain limited areas and backfill the excavated areas with clean import soil.

Project Activities:

Based on the SSI, DTSC determined, a removal action was necessary at the Site and requested additional investigation on the adjacent property to the east. The Removal Action Workplan (RAW) proposes the following activities to clean up the identified VOCs in soil and soil vapor:

- The building at 6571 Westminster Boulevard will be demolished prior to remediation.
- Excavation of approximately 550 to 775 cubic yards of VOC-impacted soil. Excavation is expected to extend to five feet deep within the footprint of the 6571 Westminster Boulevard building.
- Excavated soil will be either stockpiled onsite or directly loaded into trucks for offsite disposal. Soil with VOCs exceeding 50 parts per million will be segregated and handled separately from other soil.
- For stockpiled soil, plastic sheeting will be placed on the ground prior to loading, and the soil pile will remain covered except for when soil is loaded onto the stockpile and when loaded into truck for offsite hauling.
- Determine the appropriate waste disposal facility once the analytical results are received and a waste profile application will be submitted to the chosen facility for approval,
- Secure the Site to ensure safety. The Site will not be immediately backfilled, as the Site redevelopment plan will likely include excavation of the Site for the construction of a parking structure. If necessary, backfilling of the excavated area will be completed with clean soil after confirmation samples indicate that VOC-impacted soil is

removed. Backfill of all excavated areas with clean fill material from an offsite source which will be appropriately tested as required by the DTSC's Advisory on Import Fill Material.

- DTSC review and approval of fill material is required prior to import to the Site.
- Implementation of dust control measures in accordance with South Coast Air Quality Management District (SCAQMD) rules. The dust control measures include:
 - Dust control by using suppressant, water spray, and other forms of dust control.
 - Upwind and downwind dust monitoring.
 - Removal of soil trapped within the tires or under-carriage of vehicles that exit the Site.
 - Routine sweeping of any soil deposited on off-Site roadways outside the exit of the Site.
- Installation of a SVE System to remediate VOCs in soil vapor.
- The SVE System will consist of between four and eight SVE wells. The SVE system consists of the SVE wells connected to a knockout pot to remove entrained water and two vapor phase granular activated carbon treatment vessels connected in series. The treated vapor then flows to a blower and discharges to the atmosphere below the SCAQMD permit limit. The equipment will be in a gated site enclosure.

A final SVE system design will be submitted under separate cover following the completion of remedial excavation activities as it is possible the extent and limits of the excavation will affect the final design.

The "SVE system" consists of several components working together to induce air movement in the subsurface, to extract the vapors, and then scrub the VOCs from the extracted air columns. The system as a whole consists of SVE wells connected via 4-inch Schedule 40 PVC piping to a knockout pot that removes entrained water from the system. From the knockout pot, the vapors are pulled through two vapor phase granular activated carbon (GAC) treatment vessels connected in series. The treated vapor then flows through the blower and discharges into the atmosphere below the SCAQMD permit limit. A gated site enclosure equipped with sound suppression will be erected in a parking stall to secure the individual system components from theft or damage and minimize noise concerns.

Following the completion of a successful pilot test, the system will be placed into operation. As required by the SCAQMD, the system's effluent will be monitored for the first seven days of operation with a Photo Ionization Detector (PID) to ensure compliance with permit effluent limits. In addition, EEC will perform the following scope of work during the initial startup period:

- Measure and record system influent flow rates, vapor temperature, and vacuum (daily);
- Monitor and record blower operational hours (daily);
- Monitor and record with a PID system influent, intermediate, and effluent sample ports for GAC destruction efficiency per SCAQMD permit requirements (daily for the first week and during each site visit in accordance with SCAQMD guidelines);
- Evaluate well head vacuums to optimum extraction rates from a maximum number of wells (first and second week);
- Evaluate the need for GAC removal, replacement, and coordinate disposal if necessary;
- Evaluate radius of influence around each extraction well (first and second week);
- Collect individual SVE wellhead samples for laboratory analysis to establish a baseline for future assessment of remedial progress (first week);
- Collect influent, intermediate, and effluent air samples for laboratory analyses to ensure compliance with SCAQMD permit requirements (first and second week);
- Record electrical utility meters to monitor equipment energy usage (each and every site visit);
- Perform maintenance on mechanical parts and equipment per manufacturers' recommendations (i.e., grease zircon fittings, change blower oil, check pumps, and replace air filters) to ensure maximum life of equipment (weekly); and
- Label all equipment, lines, valves, and sample ports and prepare a process flow diagram of the system.

Following the initial startup period, EEC will continue to perform Operation and Maintenance (O&M) tasks to track, evaluate, monitor, and enhance soil and soil vapor remediation by SVE. In general, O&M includes continuous monitoring of remedial progress by the collection of a sufficient number of vapor samples to evaluate progress at each well. The tasks associated with O&M are summarized below:

- Measure and record system influent flow rates, vapor temperature, and vacuum;
- Monitor and record blower operational hours;
- Monitor and record with a PID system influent, intermediate, and effluent sample ports for GAC destruction efficiency, per SCAQMD permit requirements;
- Evaluate well head vacuums to optimum extraction rates from a maximum number of wells;
- Evaluate the need for GAC removal, replacement, and coordinate disposal if necessary;
- Collection of individual SVE wellhead samples for laboratory analysis for assessment of remedial progress (Semiannually);

- Collection of influent, intermediate, and effluent air samples for laboratory analyses to ensure compliance with SCAQMD permit requirements (Monthly); and
- Record electrical utility meters to monitor equipment energy usage.

Based on the analytical results gathered during a PEA and the SSI, the soil generated from the Site may need to be handled, transported and disposed of as non-Resource Conservation and Recovery Act (RCRA) hazardous waste. If any material is determined to be hazardous (California hazardous or RCRA hazardous) this material will be hauled off-site to a permitted facility that can accept that waste stream under a hazardous waste manifest. Final determination of the landfill used for disposal will be based on approval from the landfill of the waste streams and cost effectiveness of that facility. Once the disposal facility is selected, copies of waste profile reports used to secure disposal permission from the landfill will be provided to DTSC. In addition, compliance with the land disposal restrictions and land ban requirements for hazardous wastes will be documented and provided to DTSC once it is determined which disposal facility will be used.

Air monitoring will be performed during all Site activities at the Site in which contaminated, or potentially contaminated, materials are being disturbed or handled. Air monitoring samples will be collected over an 8 to 10 hour period each day that excavation activities are conducted. The air-monitoring professional will check the equipment every 15 minutes during operation. Liberation of dust during the removal operations will be minimized as necessary with the use of water as a dust suppressant. In addition, onsite materials and equipment will be covered with protective plastic sheeting and cleaned after removal activities to prevent any potential exposure of contaminants to the surrounding area. Similarly, adjacent paved areas will be covered with plastic sheeting and pressure washed following the removal activities, if warranted.

Cleanup activities are anticipated to take approximately two to three weeks to complete soil excavation and off-site disposal. Once the SVE system installation is complete, it will take approximately six months to one year to complete the SVE treatment.

Approximately 40 truck trips will be required for soil transportation offsite and another 40 truck trips for import of clean soil, if import is needed. Removal action activities will comply with the City of Westminster noise ordinance limitations in such all work will be conducted during between 7:00 a.m. and 5:00 p.m. If noise concerns do develop adjacent to residential areas, then temporary sound proofing may be installed along the fence line to reduce noise levels.

Following the completion of the excavation and SVE system startup, EEC will prepare a report presenting a description all remediation activities.

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

Name of Person or Agency Carrying Out Project: HHT Westminster Investment Corporation

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

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 require onsite use of a hazardous waste incinerator or thermal treatment unit.
4. The project will not require the relocation of residences or businesses.
5. 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.
6. The project will be consistent with applicable State and local environmental permitting requirements.
7. The exceptions pursuant to California Code Regulations, Title 14 § 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 project does not involve any unusual circumstances 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 view of 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. (<http://calepa.ca.gov/sitecleanup/corteselist/default.htm>)
 - e. Historical Resources. The project will not cause the substantial adverse change in the significance of an 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
Brownfields and Environmental Restoration Program
5796 Corporate Avenue
Cypress, California 90630

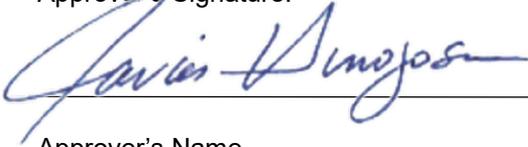
Additional project information is available on EnviroStor: www.envirostor.dtsc.ca.gov/public/

Contact Person
Johnson P. Abraham

Contact Title
Environmental Scientist

Phone Number
(714) 484-5380

Approver's Signature:



Date:
6/11/2021

Click or tap to enter a date.

Approver's Name
Javier Hinojosa

Approver's Title
Environmental Program Manager I

Approver's Phone Number
(714) 484-5484

TO BE COMPLETED BY OPR ONLY

Date Received for Filing and Posting at OPR: