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
Cypress Cleanup Branch
5796 Corporate Avenue
Cypress, California 90630

Project Title: Time Critical Removal Action Workplan, Naval Base Point Loma (NBPL), Munitions Response Program Site 7

Project Location: 500 feet south of intersection of Cabrillo Memorial Drive and Mills Street, San Diego, CA 92106

County: San Diego

Project Applicant: Point Loma Naval Base

Approval Action Under Consideration by DTSC: Removal Action Workplan

Statutory Authority: California Health and Safety Code, Chapter 6.8

Project Description: The Time Critical Removal Action (TCRA) Workplan proposes excavation, screening of contaminated soils, offsite disposal of contaminated material and backfilling of the former dump site, Installation Restoration (IR) Site 7.

The total volume of excavation across Area 1 and a portion of Area 3 within IR Site 7 is 5,600 cubic yards (yds^3). Eighty-four hundred tons of soil will be excavated and transported for off-site disposal (approximately 400 trucks over a 30-day excavation period, approximately 20 trucks a day).

Background: IR Site 7, Building A-44 Rubble Disposal Area.
IR Site 7 lies at the northern end of NBPL and is located west of Cabrillo Memorial Drive. The Point Loma Ecological Conservation Area (PLECA) is located north and west of IR Site 7. The TCRA addresses four general areas (Area 1, Area 2, Area 3, and Area 4) of disturbance and disposal that were identified at IR Site 7, totaling approximately 1.72 acres as described below.

Previous Investigations: Prior site investigations at IR Site 7 found waste consisting of construction and demolition (C&D) debris and municipal and industrial waste (landfill waste). In addition, chemicals of concern (COCs): surface soil lead, hexavalent chromium, and PCBs (Aroclor-1248 and Aroclor-1254), were identified within the soil at IR Site 7. The Navy has decided to implement a TCRA to address the potential for migration of contaminants that has been created by onsite stormwater discharge that has eroded soil and exposed a portion of the waste. A 1986 Initial Assessment Study (IAS) reported that IR Site 7 was used for disposal of construction rubble and demolition debris between 1955 and 1965, and a 1964 aerial photograph showed that IR Site 7 was covered with fill material. A small, unpaved road south of IR Site 7 provided access to IR Site 7 and a former communication tower. An extended site inspection (ESI) was conducted in 2014. The 2014 ESI recommended additional investigation for IR Site 7 based on potentially unacceptable risks for human and ecological receptors and an additional area of debris observed outside of the 0.08-acre area. The Navy procured funding in Fiscal Year 2020 to accelerate remediation for the portion of the site where a majority of COCs exceeded regulatory screening levels and where there is stormwater discharge. Four areas of disturbance/disposal were identified and waste characteristics for each area are described as follows:

- Area 1 - The western portion of the site, with buried and surficial C&D debris at the top of a slope, surficial C&D debris on the slope, and at the bottom of the slope the westernmost portion of the main drainage ravine.
- Area 2 - A southeast-northwest-trending ravine, with buried municipal waste including bottles, wood, newspaper, metal, and plastic.
- Area 3 - The main east-west-trending ravine, with C&D debris, and municipal and industrial waste observed buried in layers with indications of burning, one partially buried drum, and potential asbestos-containing material (ACM).
- Area 4 - A plateau area in the northeastern portion of the site, with buried C&D debris.

These areas were used to help describe the geographic location and were not related to the source or material disposed in the areas.

Current Conditions: A soil cover exists over most of the site. The canyon in which IR Site 7 is located is overgrown with vegetation and no longer maintained. The observed cover consists of either native sands placed specifically as cover, or native soils as colluvium that have washed down over debris to provide cover near the toes of the slopes. The thickness of the cover ranges from a minimum of approximately 1 to 2 feet (mainly in Area 3) to approximately 3 to 7 feet thick.

A stormwater conveyance pipeline discharges stormwater onto the eastern end of the site below Cabrillo Memorial Drive into a headwall and energy dissipater. Stormwater discharge from the conveyance pipeline and an adjacent ravine travels westward through the site. This stormwater discharge has eroded soil and exposed a portion of the waste. Within surface soil, lead, hexavalent chromium, and PCBs (Aroclor-1248 and Aroclor-1254) exceeded the background threshold value (where available) and risk-based screening criteria.

The Navy decided to implement a TCRA because stormwater discharge on the site has eroded soil, exposing a portion of the waste, and creating the potential for contaminant migration. The Navy procured funding in Fiscal Year 2020 to accelerate remediation for the portion of the site where a majority of COCs exceeded regulatory screening levels and where there is stormwater discharge. The proposed TCRA area is commensurate with the supplemental funding received. The Navy intends to obtain site closure for Area 1, TCRA area, and reduce the overall IR Site 7 area.

Project Activities:
The removal activities outlined in the TCRA Workplan to address surface soil lead, hexavalent chromium, and PCBs (Aroclor-1248 and Aroclor-1254) that exceeded the background threshold value (where available) and risk-based screening criteria on the Site, consist of:

- Mobilization and Site Preparation
- Vegetation Clearing and Access Road Construction
- Pre-Excavation Waste Characterization
- Excavation of Contaminated Soil
- Stormwater Channel Improvements
- Exploration Test Pits
- Decontamination
- Confirmation Sampling and Analysis
- Site Survey
- Backfilling
- Waste Characterization
- Air Monitoring
- Site Restoration
- Demobilization
- Removal Action Completion Report

Mobilization and Site Preparation: The mobilization of equipment will be staged in the laydown area, located southeast of the TCRA excavation area. An office trailer will be located just west of Cabrillo Memorial Drive, in a parking lot. Access to a water source for dust mitigation will be provided by the installation; CAPE Environmental Management Inc. will provide a backflow preventer and a meter for the water connection. Erosion controls will be installed downgradient of the stockpile area and along the drainage channel. The TCRA excavation boundaries will be surveyed and marked as needed to facilitate soil removal.

Vegetation Clearing and Access Road Construction: Vegetation and brush will be cleared as needed to access Area 1 from the south. Approximately 34,000 square feet (0.8 acre) will be cleared. Cut brush will be disposed of as green waste, and any removed root structures will be disposed with the soil waste stream from that area. Up to 19,000 square feet of vegetation will also be cleared to provide access for test pit clearing (Section 5.6). Temporary access roads will be installed from the south portion of Area 1 to allow the off-road dump truck to transport excavated material to the stockpile area.

Pre-Excavation Waste Characterization: After mobilization and setup, pre-excavation waste characterization samples will be collected from the TCRA excavation area, to support early preparation of waste profiles for direct loading of soil and debris since there is limited stockpile space at the Site.

Excavation of Contaminated Soil: An estimated 5,600 cubic yards (yd^3) of soil will be excavated from Area 1 and the western portion of Area 3. All excavation areas and haul roads will be watered as needed to control dust. Excavation will begin in Area 1 working from the top down to near the stormwater channel, then the small portion of Area 3 north of the stormwater channel and lastly the stormwater channel itself will be excavated.

Asbestos containing material (ACM) was detected at the northern portion of the TCRA excavation area. ACM and associated soil will be excavated and visually segregated for disposal where observed. Should any large piece of ACM be encountered during excavation, that material will be segregated from the soil, bagged, and staged to minimize potential for disturbing the material during subsequent soil handling. Bagged ACM will be disposed with site soils or in a separate shipment to the landfill depending on quantities generated. It is estimated that the average TCRA excavation depth will

be approximately four (4) feet bgs, based upon geologic cross sections developed through trenching and geophysical work conducted during a 2017 Remedial Investigation/Focused Feasibility Study (RI/FFS). Soil and debris will be excavated until waste and debris are not observed, and confirmation soil samples will be collected. The excavation may extend deeper if wastes are observed or based on confirmation soil sample results.

Stormwater Channel Improvements: Soil and debris will be removed from the existing stormwater channel within the defined excavation area to approximately 2.5 feet bgs. The stormwater channel will be graded to a trapezoidal shape with 3:1 horizontal to vertical side slopes. The area surrounding the channel will be graded where feasible to match the surrounding slopes and facilitate drainage into the channel. After the construction of the channel, four rock check dams will be constructed in the channel bed to a height of approximately 3 feet. The dams will be a combination of large riprap and surge stone. Rock check dams will be constructed at the eastern and western ends of the channel within the excavation area and at an approximate 60-foot spacing.

Exploration Test Pits: Exploratory test pits will be excavated outside of the TCRA excavation area to collect data to support future remedial action at IR Site 7. (The Navy is recognizing efficiencies by utilizing the TCRA mobilization to collect additional subsurface information to support future actions to be taken at IR Site 7). Exploratory test pits will be excavated at 12 locations outside the TCRA Excavation Area. The test pits are generally located along the perimeters of IR Site 7, Areas 2, 3 and 4, as well as several interior locations.

Decontamination: Heavy equipment will be decontaminated after excavation using brooms and other dry methods. Compressed air will be used if needed. Decontamination wastes will be collected and disposed with waste soil.

Confirmation Sampling and Analysis: Confirmation samples will be collected within excavations, at approximately one per 30 feet of sidewall and one per 1,000 square feet of bottom surface, and will be analyzed for lead, hexavalent chromium, and polychlorinated biphenyls (PCBs).

Site Survey: During site preparation, the proposed excavation area will be surveyed to ensure thorough and accurate excavation of the TCRA area.

Backfilling: Imported soil that meets DTSC guidelines (DTSC, 2001) will be used to backfill the remaining excavation area. The excavation area will be backfilled to approximately 50 percent of the soil volume removed; thus, approximately 2,800 yd^3 of clean backfill will be imported and placed. The excavation area will be partially filled and graded to drain.

Waste Characterization: Excavated soils, debris, and investigation-derived waste (IDW) not pre-characterized using potholes will be sampled from stockpiles for waste characterization in accordance with disposal facility requirements. Loading and Waste Disposal Non-hazardous soil, Cal-haz soil, soil containing asbestos, and debris will be disposed of at South Yuma County Landfill in Yuma, Arizona. Any green waste and recyclable materials recovered and devoid of residual soil will be taken to local recycling facilities for processing. The anticipated production rate for the project is an average of 16 to 20 truckloads of soil per day for approximately 30 working days. The haul route entrance into the site will be swept as needed with a broom attachment on the skid-steer loader.

Air Monitoring: Air monitoring will be performed during excavation, loading and hauling activities. A TSI DustTrak II will be mounted on a tripod and placed downwind of the stockpile area or at other intrusive work locations as needed. Real-time dust sampling will be conducted. If suspected air contaminants are encountered, the Site Safety and Health Officer (SSHO) will contact the project manager and Program Health and Safety Manager for further instructions. If additional monitoring is needed, the Site Safety and Health Plan (SSHP) will be modified to identify the monitoring requirements and action-level concentrations.

Site Restoration: Following backfill and grading, the excavation areas and the laydown areas will be hydroseeded with a seed mix that is based on the NBPL native plant list and is approved by the NBPL Biologist. A recommended native seeding mix is included in the NRPP in Appendix C. Any follow-up monitoring will be conducted by the NBPL Biologist, and the Biologist will make recommendations for restoration to the remedial project manager as needed.

Demobilization: Upon completion of site restoration, all temporary Best Management Practices (BMPs) not scheduled to remain in place will be removed. BMPs will be left in place until approximately 70 percent of the vegetation is established, or by other methods defined in the Storm Water General Permit.

Loading and Waste Disposal: Following all excavation, soil and debris will be loaded onto the articulated dump truck and transported to the stockpile area at the southern end of Area 1. Recyclable C&D debris such as large concrete and steel will be segregated with the excavator and recycled where feasible. Stockpiled soil will then be loaded into dump trucks for transportation and disposal. Waste disposal in Yuma, Arizona will involve approximately 20 trucks per day: 12 to 13 trucks in A.M. and 6 to 7 trucks in P.M.

Removal Action Completion Report (RACR): The RACR will describe the results of the excavation activities and will include preparation of Internal Draft, Draft, Draft Final, and Final versions. The RACR will include sampling results and locations, field documentation, figures, tables, analytical results, and other supporting information as appropriate.

Environmental Protection Plan (EPP): The EPP includes information on Emergency Planning and Community Right-to-Know Act reporting requirements. This plan describes protective measures and procedures to prevent and control pollution, limit habitat disruption, and correct environmental damage that occurs during remediation activities. Site personnel will be trained by the biological subcontractor, during a tailgate training session in avoidance measures. Field work will be coordinated to implement avoidance and minimization measures for threatened and endangered species, including vegetation clearing methods, excavation, and site restoration. Road cuts and equipment lay-down or work pads will be as small as practicable without jeopardizing worker safety or productivity. Wildlife Resources Removal activities will be managed to minimize interference with, disturbance to, and damage of wildlife resources. A biological survey was performed prior to vegetation clearing to determine if any potential threatened or endangered species are present at the site. Mobilization and field work are scheduled to begin in September 2021 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. Wood will perform periodic biological monitoring during field work. CAPE will take all actions necessary to coordinate with the Navy Biologist and Wood to ensure that field activities do not interfere with any wildlife or wildlife habitats.

Stormwater Management and Control acknowledges a National Pollutant Discharge Elimination System (NPDES) permit for this removal action is not required. Regardless, construction and/or installation of temporary erosion and sediment control BMPs (i.e., silt fences, silt logs, sidewall sloping, dust control, etc.), diversion of storm water, and prevention of runoff will be performed. Erosion controls will be installed as a BMP. They will also be installed downgradient of soil stockpiles where needed.

Dust Control Plan BMPs will be implemented to ensure soil and dust are controlled during all field activities. When trucks are loaded with soil, precautions will be taken to ensure that spillage does not occur (i.e., minimizing drop height, using a loading spotter). 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 use of additional dust control measures.

Prevention of Releases to the Environment 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. All equipment fueling and maintenance operations will be performed in a manner as to reduce the potential for a release of fuel or lubricants.

The remedial action objectives (RAOs) for the TRCA are listed in the RI/FFS Report, dated June 2021. This removal action will substantially eliminate the exposure to hazardous substances for human and ecological receptors within the TCRA area.

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: Emergency Project [PRC, Sec. 21080(b)(4); 14 CCR, Sec.15269(c)]

Reasons Why Project is Exempt: Project consists of specific actions necessary to prevent or mitigate an emergency, determined by DTSC to be, "…an imminent or substantial endangerment to the public health or welfare or to the environment, because of the release or a threatened release of a hazardous substance…" [Health and Safety Code section 25358.3(a)]. This project is necessary to prevent the potential migration of contaminants caused by onsite stormwater discharge that has eroded soil and exposed a portion of the waste.

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 Branch
5796 Corporate Avenue
Cypress, California 90630

DTSC EnviroStor website: https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=37970016

Contact Person	Contact Title	Phone Number
Sara Michael	Environmental Scientist	714-816-1983

Approver's Signature:

Date:

October 1, 2021

Approver's Name	Approver's Title	Approver's Phone Number
A. Edward Morelan, PG, CEG	Branch Chief	714-484-5440

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Date Received for Filing and Posting at OPR: