

**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
Site Mitigation and Restoration Program
5796 Corporate Avenue
Cypress, CA 90630

Project Title: Polo Cleaners Removal Action Workplan

Project Location: 23052 Alicia Parkway, Suite D, Mission Viejo, 92692

County: Orange

Project Applicant: O-A Plaza OPCO, A Delaware Limited Liability Company, Care of Westwood Financial Corp.

Approval Action Under Consideration by DTSC: Removal Action Workplan

Statutory Authority: California Health and Safety Code, Chapter 6.5

Project Description: The Department of Toxic Substances Control (DTSC) approved the Polo Cleaners (Project Site) Removal Action Workplan (RAW) located at 23052 Alicia Parkway, Suite D, Mission Viejo. The removal action includes remediation of groundwater underneath the Project Site with In-Situ Chemical Oxidation (ISCO) technology followed by long term monitoring and recordation of a Land Use Covenant (LUC). The ISCO program is intended to reduce the subsurface mass to the extent possible and thereby reducing the vapor intrusion threat.

Background: The Project Site is approximately 1,500 square feet tenant space within the Olympiad Plaza shopping center and is currently doing business as Snappy Dry Cleaners. Olympiad Plaza is located in a commercial and residential area of Mission Viejo and is developed with six single-story retail buildings including four in-line buildings and two free-standing buildings. The remaining portion of the shopping center consists of concrete walkways, asphalt-paved parking areas, and modest landscaped areas.

During the May 1997 environmental investigation for the Project Site, perchloroethylene (PCE) was detected in soil and soil gas (PES Environmental - Phase II Investigation Report) at 6 feet below ground surface (bgs) in one of the borings. In 1998 (PES Environmental - The Post Remediation Voluntary Remedial Actions Report) indicated that 18 cubic yards of impacted soil was excavated from outside the Site tenant space. The estimated volume of PCE-impacted soil remaining onsite post remedial excavation above cleanup goal of 500µg/kg was 0.3 cubic yards. The estimated dimensions of the remaining impacted soil above 500 µg/kg were 6 feet long by 0.75 feet wide by 1.75 feet deep. Based on the results of the remedial excavation activities and proposed use of the property, the Orange County Health Care Agency determined on July 10, 1998, that no further action was required.

On October 7, 2014, Polo Cleaners entered into a Voluntary Cleanup Agreement (Docket No.: HSA-VCA 14/15-034) with DTSC to assess the potential impacts at the Project Site. A Preliminary Environmental Assessment (PEA) was conducted in 2016, to investigate soil and soil vapor for volatile organic compounds (VOCs). Indoor Air Sampling was also conducted to assess potential impacts to the current occupants. The PEA identified the presence of elevated levels of VOCs in soil and soil vapor. An indoor air quality survey was conducted at the Project Site, the adjoining Subway restaurant to the west and vacant space to the east. Sampling results indicated no significant impacts to in-door air. Additional Supplemental Site Investigation during 2017 indicated that soil vapor contamination was present in sub-slab at the Site. On October 17, 2017, DTSC determined that further action is required to address soil vapor contamination at the Site.

A Soil Vapor Extraction (SVE) Pilot Study was conducted during 2018 and 2019 at the Site, to evaluate if SVE could be used for full scale remediation with dual phase extraction wells. The pilot SVE system operation was not optimized due to dense semi-consolidated sediments and persistent and unexpected shallow groundwater that limited subsurface air flow. At times, groundwater rose in the wells to less than three (3) feet below grade. The shallow groundwater required groundwater purging and made the deep soil vapor probes unusable for monitoring or sampling during the vapor extraction program. The SVE system could not be operated at maximum vacuum because the system would extract too much groundwater. ISCO technology is being considered as an alternative remedy to treat the saturated zone. DTSC approved the SVE Pilot Study Report (ADR Environmental Group, April 29, 2019) on November 1, 2019.

Project Activities: The project activities consist of treating groundwater with In-Situ Chemical Oxidation technology followed by long term monitoring and recordation of a Land Use Covenant. Permanganate will be injected into the subsurface to breakdown target organic contaminants into harmless end products. It relies on the destructive capacity of

oxidants to chemically destroy the bonds of the target contaminants. Delivery of permanganate to the subsurface will be conducted in batch feeds using the new piezometers and the existing vapor extraction wells.

Once per month for one year, the 22 delivery points will be purged using a portable vacuum system and the extracted water will be stored in drums for recycling. The premixed product will be batch fed into the piezometers and wells as a liquid. To gauge the effectiveness of the ISCO program, a sampling for soil gas will be conducted each quarter. In addition, indoor air sampling, ambient air samples will be obtained after six months and after one year in three targeted locations, two inside the former Polo Cleaners site and one outside to the south.

The goal of the remediation activities is to minimize or eliminate the existing potential human exposure to PCE and trichloroethane (TCE) cis 1,2-DCE in soil and soil vapor on the Site, reduce human health-based risks associated with PCE and TCE contamination to a level that is acceptable for commercial use, reduce the source of contamination to minimize future possible impacts to groundwater and recordation of a LUC. ISCO will be continued for long term if the technology works; if not, other technologies will be evaluated after a year.

The RAW will be implemented starting fourth quarter of 2021. 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. During implementation, ISCO will require air monitoring for background levels and also within the immediate breathing zones at minimum intervals of every 30 minutes, or more frequently if needed.

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 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.

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

Name of Person or Agency Carrying Out Project: Westwood Financial

Exempt Status: Categorical Exemption: [Section 15330, Class 30]

Exemption Title: Minor Actions to Prevent, Minimize, Stabilize, Mitigate or Eliminate the Release or Threat of Release of Hazardous Waste or Hazardous Substances

Reasons Why Project is Exempt:

1. The project is a minor action designed to prevent, minimize, stabilize, mitigate, or eliminate the release or threat of release of hazardous waste or hazardous substances.
2. The project will not exceed \$1 million in cost.
3. The project will be consistent with applicable State and local environmental permitting requirements.
4. The project does not involve the onsite use of a hazardous waste incinerator or thermal treatment unit.
5. The project does not involve the relocation of residences or businesses.
6. The project does not involve the potential release into the air of volatile organic compounds as defined in Health and Safety Code Section 25123. (Exception: Small-scale in situ soil vapor extraction and treatment systems which have been permitted by the local Air Pollution Control District or Air Quality Management District.)
7. The exceptions pursuant to California Code of Regulations, Title 14, Section 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 environmental safeguards and monitoring procedures that are enforceable and made a condition of project approval will prevent unusual circumstances from occurring 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 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 a substantial adverse change in the significance of a historical resource at the Site because there are none at the Site.

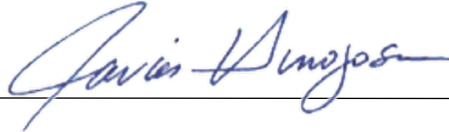
The administrative record for this project is available to the public by appointment at the following location:

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

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

Contact Person Aslam Shareef	Contact Title Hazardous Substances Engineer	Phone Number (714) 484-5472
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Approver's Signature:



Date:

October 1, 2021

Approver's Name Javier Hinojosa	Approver's Title Branch Chief	Approver's Phone Number (714) 484-5484
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TO BE COMPLETED BY OPR ONLY

Date Received for Filing and Posting at OPR: