# 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
9211 Oakdale Avenue
Chatsworth, CA 91311

**Project Title**: Removal Action Workplan Former Southern California Gas Company/Olympic Base

**Project Location**: 2424 East Olympic Boulevard, Los Angeles

**County:** Los Angeles

**Project Applicant**: Southern California Gas Company

**Approval Action Under Consideration by DTSC**: Removal Action Workplan

**Statutory Authority**: California Health and Safety Code, Chapter 6.8

**Project Description**: The project includes excavating the shallow soil in the eastern portion of the Alley to an estimated depth of 2 feet below ground and implementing a new Land Use Covenant (LUC) for the newly investigated and capped area extending beyond the original cap that was subjected to the original LUC recorded on May 23, 1991. The California Department of Toxic Substances Control (DTSC) determined remedial actions were required to address elevated concentrations of polycyclic aromatic hydrocarbons (PAHs) at the former Southern California Gas Company/Olympic Base Site (Site). The Removal Action Workplan (RAW) from Southern California Gas Company (SoCalGas) addresses the PAHs in the soil at the Site as well as in the shallow soil in the alley way (Alley) adjacent to the southern border of the Site, belonging to the City of Los Angeles. The PAHs have migrated from the Site to the Alley are reported in surface soils of the eastern portion of the Alley at concentrations that pose an unacceptable risk to hypothetical future on-site residents.

**Background**: The Site occupies 16.22 acres, approximately 7 acres of which constitute the area investigated in the past as well as the additional area investigated between 2014 and 2016. SoCalGas has leased a portion of the property to Waste Management Inc. and the City of Los Angeles Bureau of Street Services. The remainder of the property is fenced and currently unoccupied. The investigation area is entirely paved with asphalt and contains six unoccupied buildings. The Site is bound by East Olympic Boulevard to the north, commercial properties and South Santa Fe Avenue to the west, a railroad easement to the east, and an unnamed alley and commercial properties to the south. The banks of the Los Angeles River are located to the east of the railroad tracks within 300 feet of the Site limits. The Alley is owned by the City of Los Angeles and is currently unoccupied, unpaved, fenced, and inaccessible to the general public.

The manufactured gas plant (MGP) was initially built in 1907 by the City Gas Company of Los Angeles and was later purchased by Domestic Gas Company in 1908. SoCalGas took over the ownership of the Olympic Base MGP in 1910. Gas production operations were conducted at the Site until approximately 1927. Between 1927 and 1952, the MGP was on standby for emergency use when all gas manufacturing operations ceased, and the plant was dismantled. During the gas manufacturing period, the MGP operated using an oil gasification process. In 1991, a cap was constructed over the eastern portion of the Site. A LUC was recorded on May 23, 1991, to restrict use of the eastern portion of the Site to commercial/industrial use. Annual cap inspection reports have been periodically submitted to DTSC for review.

Between 2014-2016, additional area was investigated. The investigation indicated that Site related contamination extended westward, beyond portions of the original boundaries of the cap and also may have migrated off site to the south into the Alley. Based on the results of the investigations and because asphalt had aged since installation in 1991, the majority of the asphalt cap was resurfaced in 2017. The asphalt resurfacing work extended westward beyond the boundaries of the original cap and the LUC, therefore a new LUC is needed to restrict the original restricted area and the newly added investigated area at the Site. In 2017, after the Alley was investigated, it was concluded that the PAH contamination in the Alley could not be ruled out from having migrated southward from the Site and DTSC recommended remediation. Lead concentration in the shallow soil in the Alley is higher than that at the Site and is not associated with gas manufacturing at the site but is consistent with prior use of the Alley as a railroad spur.

The Site and the Alley are in an industrialized part of Los Angeles. The Site is entirely covered by buildings, asphalt, and concrete, with no exposed soils. While the Alley has exposed soils, it is a small area surrounded by developed properties and does not represent viable ecological habitat. Therefore, ecological receptors are not considered in this RAW.

**Project Activities**: The removal action outlined in the RAW consists of:

a. Implementing a new LUC and O&M Agreement to cover the expanded cap area created during the 2017 resurfacing; and

b. excavating the PAH contaminated soil from the Alley and transporting the excavated soil to a thermal desorption facility for treatment.

Containment of PAH-impacted soil within the Site will be achieved with the existing asphalt/concrete cap. Asphalt and/or concrete cover the PAH-impacted soil, therefore, no new asphalt/concrete cover will be needed. A new LUC and O&M Agreement will be generated to cover the PAH-impacted portion of the Site. The LUC will limit the acceptable land uses of the Site, require the presence and maintenance of an asphalt cap, and prevent unapproved construction activities from disrupting the cap or impacted soils.

Approximately 719 Cubic Yard (1,110 tons) of PAH-impacted soil will be excavated from the excavation area of 0.22 acres in the eastern portion of the Alley to an estimated depth of 2 feet. As soil with locally elevated lead concentrations in the eastern portion of the Alley are collocated with elevated CPAH concentrations, the removal of PAH-contaminated soil will result in lead contaminated soil, requiring classification of lead impacted waste prior to transport of excavated soils to the targeted Soil Safe facilities in Adelanto, California. Because Soil Safe can only accept nonhazardous wastes, non-hazardous PAH-impacted soil will be transported to the facility. All soils with lead impact above California Hazardous Waste levels will be transported to a waste management facility capable of accepting hazardous soils.

After the planned soil removal is complete and prior to backfilling, confirmation soil sampling will ensure that remedial action objectives have been achieved. Based on the confirmation sample results, additional soils may be removed to achieve the preliminary evaluation concentration. Soil excavated from the Alley will be pre-characterized for waste disposal purposes, placed on the Site on plastic and the existing impermeable asphalt cap (Figure 6). The soil will then be loaded onto 3 trucks for off-site treatment and disposal/reuse, for a total of 6 truck trips based on 3 round trips per day. Any stockpiled soil that remains overnight onsite will be covered with plastic and secured.

Traffic control measures are not expected to be necessary. During soil hauling periods, traffic into and out of the Site will have minimal impact to traffic flow on Santa Fe Avenue. A significant number of haul trucks, associated with Waste Management's (current leasee of the northern portion of the property) activities, currently enter and exit the site without traffic control measures. These trucks entering and exiting the Site impose no additional burden on Santa Fe Avenue traffic flow. If necessary, trucks will be staggered to ensure no adverse traffic effects. Trucks will use a pre-planned and authorized route, which is anticipated to be exiting the Site by taking a right (north) onto Santa Fe Avenue, a left (west) onto Porter Street followed by merging onto the 5, 10 and 60 freeways toward the Soil Safe facility in Adelanto, CA. Staging and access paths will be developed for equipment to be used during remediation so that off-site tracking of wastes is decreased/eliminated. Trucks used for the off-site transportation of contaminated soil and debris will remain in clean areas at all times when on site to minimize the need to decontaminate the truck tires. While loading trucks, dust emissions will be monitored and mitigated, as necessary. Haul trucks will be equipped to fully cover all soil and debris during transportation. At a minimum, soil and debris will be tightly covered by a heavy tarpaulin. Dust control measures will be implemented during remediation activities. All equipment wheels/tires will be cleaned over plastic sheeting by means of shovels and stiff-bristled brooms or brushes until they are fully cleaned. Upon completion of cleaning, debris will be placed in the appropriate container for proper disposal and the plastic sheeting will be folded and disposed of appropriately.

The planned excavation area is expected to require some efforts in dust control. Typical dust control measures may include water spray from a water truck, spray of water amended with environmentally safe additives (such as Simple Green, or Envirotech Vapor Suppression, or equivalent), application of chemical foams, or coverage with plastic sheeting. If encountered, excavated soils deemed hazardous due to lead concentration will be transported to a licensed and permitted treatment/storage/disposal facility (TSDF) of SoCalGas's choice. Hazardous waste encountered at the Site (if any) cannot be transported to Soil Safe. All hazardous waste will be transported to one of the following landfills, which have been approved by SoCalGas: (1) Clean Harbors, Buttonwillow Landfill, 2500 West Lokern Road, Buttonwillow, California (Tel. 661-762-6200); or (2) Waste Management Inc., Kettleman Hills Landfill, 35251 Old Skyline Road, Kettleman City, California.

Different locations will be identified for perimeter air and dust monitoring stations and begin monitoring, as necessary. Due to the hazardous nature of shallow soils containing lead, air monitoring will be required in accordance with SCAQMD Rule 1466. Noise monitoring will be performed using hand-held instruments. Only authorized personnel are allowed to access the project site. If a temporary fence is necessary to achieve segregation, a fence will be installed. Plastic sheeting will be placed underneath and over the stockpiled contaminated soils. Equipment operation will be limited to daylight hours, Monday through Friday, 7am to 7pm. If needed, after daylight hours and during weekends, work will be performed under local

ordinance requirements, or under a special Site-specific noise variance. The work is expected to be completed in less than one month.

Although not anticipated due to the nature of the Site/project, 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 makes an assessment of 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 the 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**: Southern California Gas Company

**Exempt Status**: Categorical Exemption: Minor Actions Taken to Prevent, Minimize, Stabilize, Mitigate, or Eliminate the Release or Threat of Release of Hazardous Waste or Hazardous Substance 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 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. All necessary permits for removal activities, transportation, and air quality will be obtained prior to remediation. The anticipated permits may include, but are not necessarily limited to, the following:
    a. City of Los Angeles, Bureau of Engineering Excavation Permit (Likely E Permit).
    b. City of Los Angeles Right-of-Entry permit for accessing the Alley.
    c. City and/or County of Los Angeles transportation permit(s), if necessary.
    d. SCAQMD Rule 401 (visible emissions) permit requirements will be satisfied prior to the start of excavation activities.
    e. SCAQMD Rule 402 (nuisance dust) permit and requirements will be satisfied prior to the start of excavation activities.
    f. SCAQMD Rule 403 (fugitive dust control) permit requirements will be satisfied, if necessary, prior to the start of excavation activities, including the preparation of a
    g. fugitive dust emission control plan.
    h. SCAQMD Rule 1466 (Control of Particulate Emissions from Soils with Toxic Air Contaminants) permit
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.

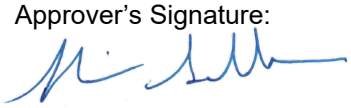
The administrative record for this project is available to the public by appointment at the following location:

Department of Toxic Substances Control
Site Mitigation and Restoration Branch
9211 Oakdale Avenue
Chatsworth, California 91311

Additional project information is available on EnviroStor:
https://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=19490179

| Contact Person | Contact Title | Phone Number |
|---|---|---|
| Patrick Movlay | Senior Environmental Scientist | 818-717-6542 |

Approver's Signature:



Date: 11/30/2021

| Approver's Name | Approver's Title | Approver's Phone Number |
|---|---|---|
| Haissam Y. Salloum, P.E | Branch Chief | 818-717-6538 |

TO BE COMPLETED BY OPR ONLY

Date Received for Filing and Posting at OPR: