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
1515 Tollhouse Road
Clovis, California 93611

Project Title: Delano PCE Investigation		
Project Address: 910 Main Street, 918 Main Street, 811 11th Avenue	**City:** Delano	**County:** Kern

Approval Action Under Consideration by DTSC:

☒ Removal Action Workplan	☐ Initial Permit Issuance	☐ Permit Re-Issuance
☐ Corrective Measure Study/Statement of Basis	☐ Permit Modification	☐ Closure Plan
☐ Remedial Action Plan	☐ Regulations	☐ Interim Removal
☐ Other (specify):		

Statutory Authority:

☐ California H&SC, Chap. 6.5 ☒ California H&SC, Chap. 6.8 ☐ Other (specify):

Project Description: The project involves implementation of a Removal Action Workplan (RAW) which proposes installation of soil vapor extraction (SVE) and treatment systems designed to remove volatile organic compound (VOC) mass in soil and soil vapor from the source areas near the former dry-cleaning operations to the extent practicable, reduce the potential for human health risks associated with vapor intrusion within the source areas, limit the migration of VOCs in soil from the source areas to groundwater, and limit the migration of VOCs in the soil vapor away from the source area.

Background: The Site consists of three separate properties in the downtown area of the City of Delano and includes two current and one former dry-cleaner facilities. The three current and former dry cleaner facilities include: Oak Lane Cleaners at 910 Main Street; Oasis Cleaners at 920 Main Street; and Farmers Insurance (Former National Cleaners Site) at 811 11th Avenue. Numerous environmental investigations have been conducted at the Site since 2011 and have demonstrated impacts to soil, indoor air, and groundwater around the three dry cleaner facilities from VOCs that include Tetrachloroethene (PCE) and Trichloroethene (TCE). Oak Lane Cleaners, currently in operation, may have started operating as early as 1917. Oasis Cleaners also is currently an operating dry cleaner and has operated as a dry cleaner under different ownerships since at least 1947. The former National Cleaners operated as a dry cleaner from at least 1941 or 1942 through at least 1982. The former National Cleaners building is presently occupied by an insurance agency.

In August 2011, a passive soil gas survey was conducted and the survey results indicated elevated VOC concentrations near the current and former dry cleaner businesses. The businesses are connected to the municipal sewer system and sewer pipes from the dry cleaners are connected sewer interceptor pipes located in an alley that abut each of the locations. Potential sources of PCE in soil gas and groundwater include disposal of dry-cleaning solvents through spills and other handling processes at the dry-cleaning facilities as well as releases of PCE to and from the sanitary sewer system.

Additional soil gas testing conducted in 2012 detected PCE concentrations of up to 307 micrograms per cubic meter (µg/m^3). PCE has been detected in indoor air samples collected at buildings at and near the dry cleaner locations at concentrations of up to 820 µg/m^3.

Discrete groundwater samples collected at the Site in 2014 detected PCE concentrations in groundwater of up to 4,900 micrograms per liter (µg/l). The California Maximum Contaminant Level (MCL) for PCE in drinking water is 5 µg/l. Data generated during subsequent groundwater investigations indicated that most impacts by VOCs in the primary source areas extend from approximately 20 to 90 feet below ground surface (bgs), with the highest VOC concentrations observed between approximately 60 and 90 feet bgs.

Since 2015, DTSC has implemented the following investigations and measures:

- Collected indoor air, soil gas and groundwater samples (Spring and Fall 2015, Spring 2016, and Fall 2017);
- Completed interim mitigation measures at various buildings in the plume area to prevent vapor intrusion to indoor air (Fall 2015);

- Built five shallow groundwater monitoring wells in the plume area (December 2016);
- Designed and tested SVE systems at the Former National Cleaners site and Oasis Cleaners site (Spring 2018);
- Built two deep groundwater monitoring wells east of the plume area (June 2018);
- Approved an Investigation Report summarizing past and current soil gas, indoor air and groundwater monitoring results (November 2018); and
- Conducted a Potentially Responsible Party Search and additional vapor probes installation and sampling (Fall 2019).

Project Activities: The proposed remedy will include installation of multiple extraction and monitoring wells within the source areas, along with two SVE treatment systems, one located adjacent to the Oasis Cleaners site and another at the former National Cleaners Site. Each SVE system will consist of a blower and heat exchanger, both housed in a sound-blocking treatment compound, as well as consist of a knockout tank, granular activated carbon vessels, and a condensate tank.

Two SVE treatment systems would be designed and constructed in an accessible central location near the source areas to treat and discharge off-gas. One SVE system would be constructed near the former National Cleaners and one SVE system would be constructed near the Oasis and Oak Lane Cleaners. The National Cleaners SVE system would include existing vent wells comprising four single completion wells and one nested well screened at various intervals to approximately 90 feet bgs. The Oasis/Oak Lane Cleaners SVE system would likely include the existing vent wells and five new nested vent wells screened at various intervals to approximately 90 feet bgs. The final locations for the extraction wells would be adjusted as needed based on the final design access. In addition to the vent wells, three nested vapor monitoring probes would be installed near the Oasis/Oak Lane Cleaners SVE system to evaluate performance during operation. The existing vapor probes near the National Cleaners would be utilized to evaluate performance.

SVE system construction activities will include mobilization and Site preparation, well installation, subsurface conveyance piping installation, treatment system installation, and startup and testing. Construction activities will include limited trenching and disturbance of soils, followed by backfill and compaction. The anticipated depths of trenching activities during construction of the SVE systems are less than 4 feet bgs.

Site controls will be implemented during construction to assure health and safety of Site workers and the public and to minimize impacts to the environment and air quality. Site controls will minimize fugitive dust impacts during trenching activities, equipment and vehicle transportation on-site and off-site, and stockpiling. Traffic control will be provided as well.

Construction activities at the Site are not expected to result in a land disturbance of one acre or more; as such, the project is not expected to require a National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity (General Permit) issued by the California State Water Resources Control Board (SWRCB). Temporary storm water management best management practices (BMPs) will be implemented during construction to prevent storm water run-on to and run-off from the Site, erosion, and sedimentation.

The two SVE systems will be surrounded by fenced enclosures fitted with privacy slats to restrict outside views of SVE equipment. Condensate generated by SVE operation activities will be stored onsite in a tank and inspected frequently for leaks. The stored wastewater will be pumped out and transported offsite for disposal at an appropriately licensed disposal facility by a licensed waste hauler.

Potential noise impacts during site construction activities will be mitigated by limiting drill rig and construction equipment operation to times allowed by City of Delano municipal code (Section 9.36.040). According to the City noise ordinance (Chapter 9.36 – Noise), “It is unlawful for any person to operate any machinery, equipment, pump, fan, air-conditioning apparatus or similar mechanical device in any manner so as to create any noise which would cause the noise level at the property line of any property to exceed the ambient noise level or ambient base level (55 decibels from 10pm to 7am and 60 decibels from 7am to 10pm) by more than five decibels.” The SVE blowers will be housed in a container and equipped with silencers to reduce noise to levels consistent with the City standards for noise.

Prior to implementation, the necessary approvals, permits, and licenses required by local and state agencies will be obtained which include:

- Well Permits – City of Delano and/or Kern County Environmental Health Division (KCEHD);
- Encroachment Permits – City of Delano;

- Authority to Construct / Permit to Operate – San Joaquin Valley Air Pollution Control District (SJVAPCD);
- An electrical permit may be required by Kern County for the SVE systems new electrical circuit; and
- A grading permit or other local permit may be required by Kern County (unlikely due to the limited amount of soil to be excavated).

Construction activities are anticipated to be completed within 2 months and will generally include trenching, below and above-grade pipe installation, treatment compound construction, and electrical installation. The SVE systems are anticipated to operate continuously for approximately four years, followed by one year of cycling operation for rebound testing. Routine operation and maintenance (O&M) will consist of bi-weekly and monthly site visits to measure process parameters, collect samples, and perform mechanical maintenance activities. Affected parties will be notified of the scheduled work dates approximately one week prior to commencing work. Nearby property owners and tenants will be notified at least five days in advance of field activities.

An analysis of project activities upon existing environmental conditions indicates that implementation of environmental safeguards and monitoring procedures that are enforceable and made a condition of project approval will ensure that impacts to the environment will be less than significant.

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

Name of Person or Agency Carrying Out Project: Department of Toxic Substances Control

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: Common Sense: It can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment.

Reasons Why Project is Exempt:

DTSC has determined with certainty that there is no possibility that the activities in question may have a significant effect on the environment because the project would not result in "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance."

The project is consistent with applicable state and local environmental permitting requirements including, but not limited to, air quality rules such as those governing volatile organic compounds and water quality standards and approved by the regulatory body with jurisdiction over the site. Prior to implementing field activities, all necessary permits will be obtained from the City of Delano, Kern County, and SJVAPCD.

Evidence to support the above reasons is documented in the project file record, available for inspection at:

Department of Toxic Substances Control
Brownfields and Environmental Restoration Program
1515 Tollhouse Road
Clovis, California 93611

DTSC EnviroStor website: [https://www.envirostor.dtsc.ca.gov/screens/menu?global_id=60001327]

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Project Manager	Title	Phone No.

Ed Walker 12/20/2021

Branch Chief's Signature Date

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TO BE COMPLETED BY OPR ONLY

Date Received for Filing and Posting at OPR: