

## 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

<b>Project Title:</b> Former Tri Air Facility Draft Removal Action Workplan		
<b>Project Address:</b> 915 10 <sup>th</sup> Street	<b>City:</b> Firebaugh	<b>County:</b> Fresno
<b>Approval Action Under Consideration by DTSC:</b>		
<input checked="" type="checkbox"/> Removal Action Workplan	<input type="checkbox"/> Initial Permit Issuance	<input type="checkbox"/> Permit Re-Issuance
<input type="checkbox"/> Corrective Measure Study/Statement of Basis	<input type="checkbox"/> Permit Modification	<input type="checkbox"/> Closure Plan
<input type="checkbox"/> Remedial Action Plan	<input type="checkbox"/> Regulations	<input type="checkbox"/> Interim Removal
<input type="checkbox"/> Other (specify):		
<b>Statutory Authority:</b>		
<input type="checkbox"/> California H&SC, Chap. 6.5 <input checked="" type="checkbox"/> California H&SC, Chap. 6.8 <input type="checkbox"/> Other (specify):		

**Project Description:** The project involves implementation of a Draft Removal Action Workplan (RAW) which proposes installation and sampling of groundwater monitoring wells at the Former Tri-Air, Inc. facility (Site) to address groundwater contamination.

**Background:** The Site is located at 915 10<sup>th</sup> Street in the City of Firebaugh, California and comprises approximately 5 acres of industrial land uses. The Site is bordered by the Firebaugh Airport to the northeast and the Site maintains access to the Firebaugh Airport for mobilization of aerial agricultural chemical applicators. The Site has been used as an agricultural chemical applicator that included crop-dusting operations that were conducted by former Tri-Air since 1972. Agricultural chemical applicator maintenance and operations are currently performed onsite by Pacific Ag Services, Inc. The Site consists of an office building, an airplane hangar and mechanical shop, a pesticide storage area, rinse and rinse water collection facilities, and an above ground storage tank and dispensers.

Multiple Site investigations have been completed for over 30 years to characterize the contamination of soil and groundwater at the former Tri-Air facility. These investigations include remedial investigations to characterize soil, groundwater, and soil vapor impacts by dinoseb and other herbicides, pesticides, arsenic, total petroleum hydrocarbons as aviation gasoline (TPH-ag), benzene, toluene, ethylbenzene, and xylenes (BTEX). An interim groundwater remediation system was installed in 1993 in which approximately 2,700 gallons of petroleum hydrocarbon compounds (PHC) product and water were removed. In addition, five monitoring wells were constructed at the Site between 1992 and 1996.

A human health risk assessment (HHRA) was conducted at the Site in 2005. The assessment concluded that for a current commercial worker the Hazard Index (HI) was calculated at 1 and the lifetime excess cancer risk (CR) was estimated at 3E-5 which are both considered within the acceptable range for risk. The primary contaminants of potential concern (COPCs) for the CR was arsenic in soil and chloroform in groundwater, both from ingestion of soil and groundwater.

In 2011, an Engineering Evaluation/Cost Analysis (EE/CA) was performed to evaluate three options for remedial action at the Site: (1) pump, treat, and discharge groundwater; (2) enhanced in-situ bioremediation, and (3) monitored natural attenuation. Monitored natural attenuation (MNA) was selected as the remedy which assumes plume stabilization below the affected Site such that residual concentrations of COPCs do not pose a significant human health risk. Monitored natural attenuation will require long-term groundwater monitoring to monitor plume stability until background groundwater conditions are met.

A Covenant to Restrict Use of Property (LUC) was filed with the Fresno County Recorder on June 12, 2012. The LUC specified prohibited future Site uses including residential, hospitals, schools, and day care for children. The LUC also specified certain activities that are subject to a Soil Management Plan and provides a list of prohibited activities including drilling for and extraction of groundwater except as approved under a Groundwater Management Plan.

Groundwater monitoring resumed in December 2018 and has occurred on a quarterly basis with the most recent sampling event completed in December 2019. Results of the December 2018 through December 2019 sampling event indicated no reportable BTEX in groundwater. Methyl-tert butyl ether (MTBE) was reported at estimated concentrations ranging from 0.23 µg/L to 0.12 µg/L from June through December 2019. Dinoseb was reported at 11 µg/L and 3.5 µg/L in June 2019, and at 120 µg/L in December 2019.

**Project Activities:** Implementation of MNA requires that groundwater monitoring be conducted to monitor plume stabilization below the Site such that residual concentrations of contaminants of concern (COCs) do not pose a significant human health risk. According to the EE/CA, long-groundwater monitoring is necessary to verify continued plume stability until background groundwater conditions (identified as the cleanup goal of 7 µg/L for dinoseb) are met. The estimated time to attenuate dinoseb to the cleanup goal is 18 to 43 years.

Remediation tasks will include 1) installation of groundwater monitoring wells and collection of discrete-depth samples and 2) groundwater monitoring of existing and newly constructed wells. This work will be conducted in two phases and include 1) the collection of vertical profile groundwater samples from three temporary boring locations, cross- and downgradient from the current monitoring wells and 2) the installation of two new groundwater monitoring wells to serve as sentry wells to demonstrate plume stability. The following specific activities of the MNA remedy are proposed to be implemented in two phases:

**Phase 1:**

- Advancing three soil borings to depths up to 50 feet bgs to collect depth-discrete water samples to evaluate the presence of dinoseb offsite in the predominant historical downgradient directions, west, and northeast.
- Collecting depth-discrete groundwater samples from both shallow and deeper groundwater-bearing zones.

**Phase 2:**

- Installing two new permanent groundwater monitoring wells as sentry wells, outside the current area of the dinoseb plume. One well will be situated west of the plume, and one northeast of the Site at the west corner of the airport to account for fluctuations in groundwater direction consistent with historical data. The new wells will be screened from 5 feet to 25 feet bgs, consistent with construction of existing Site monitoring wells.
- Developing and surveying the new groundwater monitoring wells.
- Collecting groundwater elevation data in the new and existing groundwater monitoring wells, measuring field parameters, and using low-flow methodologies to collect samples from the new and existing monitoring wells.

The installation of the two groundwater monitoring wells will take approximately one week. Potential noise impacts will be mitigated by limiting drill rig operation to times allowed by City of Firebaugh Police Regulations Municipal Code (Chapter 3, Section 3-1.1.d.1, Noise Regulations) of which construction equipment is prohibited from operating between 10:00 p.m. and 7:00 a.m.

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

- Well permits from the Fresno County Environmental Health Division, City of Firebaugh; and
- Encroachment Permits from the City of Firebaugh.

In addition, 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:** Tri-Air, Inc.

**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, 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 Firebaugh and Fresno County Environmental Health Division.

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/public/profile\\_report.asp?global\\_id=60000236](https://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=60000236)

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<i>Ed Walker</i>		01/12/2022
Branch Chief's Signature		Date
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**TO BE COMPLETED BY OPR ONLY**

Date Received for Filing and Posting at OPR: