

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
Site Mitigation and Restoration Branch
5796 Corporate Avenue
Cypress, California 90630

Project Title: Vadose Zone Feasibility Study and Remedial Action Plan, Alumin-Art Plating Company, Inc.		
Project Address: 803 West State Street	City: Ontario	County: San Bernardino
Approval Action Under Consideration by DTSC:		
<input 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 checked="" type="checkbox"/> Remedial Action Plan	<input type="checkbox"/> Regulations	<input type="checkbox"/> Interim Removal
<input type="checkbox"/> Other (specify):		
Statutory Authority:		
<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 environmental cleanup actions as described in the Vadose Zone Feasibility Study and Remedial Action Plan (RAP) for soil and soil vapor containing tetrachloroethene (PCE) and trichloroethene (TCE) at 803 West State Street, Ontario, CA (Site). The RAP summarizes historic soil and soil vapor investigations. In addition, the RAP describes the use of institutional controls, expansion of an existing soil vapor extraction (SVE) system, and use of a sub-slab depressurization (SSD) as a contingent measure to remediate the PCE and TCE at the Site.

Background: The Site encompasses approximately $\frac{3}{4}$ acres located in a mixed-use area of the City of Ontario that includes commercial, industrial, and residential uses. A residential property is located adjacent to the south of the Site. Immediately to the west of the Site is a diesel engine repair company. Railway right-of-way and tracks are located due north of West State Street. Vacant land is located to the east of the Site. The Site contains two buildings referred to as the East and West Building. The East Building is currently used for metal finishing operations. The West Building is currently used for sandblasting and powder coating. The southern portion of the West Building is also used for shipping and receiving and contains a small "laboratory room."

Alumin-Art has occupied the Site for metal finishing operations since approximately 1964. Solvents containing PCE were reportedly used on an as-needed basis in the East Building near the former plating line area until the late 1980s. A former vapor degreaser was located on the western side of the East Building.

In April 1993, the facility was issued Tiered Permitting Conditional Authorization to treat hazardous waste on Site. In December 1996, a Phase I environmental assessment checklist was submitted to DTSC certifying that no further investigation was required at the Site. In November 2007, a Phase I environmental verification inspection was conducted by DTSC at the Site and three areas of concern (AOCs) were designated as requiring further investigation. Subsurface investigations have been conducted at the Site from 2008 through 2021 which include soil sampling from shallow zone ($\frac{1}{2}$ to 15 feet deep) for metals, cyanide, pH levels, volatile organic compounds (VOCs), chlorinated herbicides, and/or chlorinated pesticides; soil gas sampling from probes installed across the vadose zone (5 to 310 feet deep); and groundwater investigation.

In 2020, SVE pilot testing was conducted at the Site. SVE pilot testing was initially conducted using three SVE wells installed in 2017 located in the southern portion of the Site where elevated concentrations of PCE were detected in soil vapor. Subsequent pilot testing was conducted using a fourth SVE well installed in 2020 as a deeper companion to the three previous SVE wells.

The SVE pilot testing system consisted of a skid-mounted 25-horsepower blower capable of a maximum flow rate of 500 standard cubic feet per min (scfm) and two 1,000-pound granular activated carbon (GAC) vessels for VOC removal. The wells are connected to below and above grade piping that are used to convey extracted vapor and entrained moisture to a knockout tank where water is separated from the influent vapor stream. After passing through the knockout tank, the vapor stream is conveyed through the two GAC vessels by the blower. The GAC vessels adsorb VOCs from the extracted vapor after which the treated vapor exits the system to the atmosphere through an exhaust stack which terminates at a minimum height of 16 feet in compliance with South Coast Air Quality Management District (SCAQMD) permit G65238. The system was installed outside of the northern end of the West Building and connected to the SVE wells via a 4-inch diameter common pipe installed along the east side of the same building. The SVE wellheads were fitted with new

equipment to allow for flow control, vapor measurement, and vapor sampling. Initial pilot testing commenced in May 2020 and has been conducted on an extended schedule with SVE system operations continuing today.

Indoor air assessment was conducted within the structures located at the Site and within the residential building to the south of the Site in 2014 and again in 2021 after the SVE pilot study started. For the West Building, the 2014 data indicated that PCE was detected at concentrations exceeding its industrial air screening levels (SLs). In 2021, PCE was detected at a concentration slightly exceeding the industrial air SL within the West Building, corresponding to a theoretical excess lifetime cancer risk (ELCR) of 1.6×10^{-6} , which is at the low end of the risk management range. For the adjacent residence on the south, the 2014 data indicated multiple VOCs exceeding residential air SLs. Results from the 2021 samples indicated PCE and TCE were not detected, but other VOCs including benzene, carbon tetrachloride, chloroform, and 1,2-Dichloroethane were present above residential SLs. These other VOCs were determined to most likely be related to sources other than that from the Site soil vapor.

Project Activities: Separate activities will be implemented on the Site to remediate metals-impacted soils and VOCs in soil vapor. Each of these remediation activities (i.e., soil vapor extraction, sub-slab depressurization, institutional controls) are described further below.

Soil Vapor Extraction

The extended SVE pilot test has demonstrated that extraction of soil vapor from the subsurface has successfully reduced VOC concentrations and reduced the potential for soil vapor to impact indoor and ambient air. Therefore, the existing SVE system will be expanded to increase VOC removal throughout a wider area and at deeper depths. The key components of the expanded SVE system include:

- Additional SVE wells to extract soil vapor from the full extent of the affected vadose zone;
- Additional soil vapor probes to monitor subsurface vacuum response and VOC concentrations; and
- An upgraded blower capable of creating a high vacuum to extract soil vapor from the deeper SVE wells, and larger carbon vessels to address increased influent rates or install a second set of SVE treatment unit.

The expanded SVE system will incorporate the existing SVE wells, soil vapor probes, and treatment system(s) along with drilling an additional six extraction wells and probes to address VOCs in the vadose zone. The additional extraction wells will be constructed with 30-foot screens and be nested with two to four screen intervals per boring. Each boring will be advanced using an appropriate drilling technology (e.g., air rotary casing hammer, hollow stem auger rig) to depths ranging from 125 to 350 feet. Additional soil vapor probes may be installed in conjunction with the new extraction wells. The probes will be used along with existing probes to monitor performance of the expanded SVE system.

Sub-Slab Depressurization

SSD is a contingent measure if the vapor intrusion risks are identified at the Site and/or the adjacent residential properties. Application of SSD is expected to reduce the risk of soil vapor movement to existing on- and off-site structures and will thereby reduce potential impacts to human health. The lead-time required to implement the technology is relatively short. Should the results of additional indoor air sampling indicate vapor intrusion mitigation is required, SSD will be installed underneath the buildings.

Results from further indoor air quality assessment within onsite facilities and nearby residences will determine where to install SSD systems. Prior to installation of any SSD system, design documents will be produced, a work plan will be prepared describing implementation of an SSD system as an interim measure, required permits will be obtained, and access agreements will be established.

If an SSD is determined to be required, the system(s) will include the installation of vacuum points through the slab within the subbase material underlying each structure. A blower will then be attached to the vacuum points to extract vapor from below the slabs. Extracted vapor would be conveyed to a GAC canister which will reduce or eliminate VOCs prior to discharge to the atmosphere as allowed under permit conditions. Following implementation, additional indoor air quality assessments will be conducted to confirm mitigation of vapor intrusion. If an SSD is required, the system(s) will operate until the full-scale SVE is confirmed to mitigate vapor intrusion into the structures.

Institutional Controls

Institutional controls will be established for the Site as proprietary controls in the form of deed covenants and/or land use restrictions recorded for the property. The controls will not allow disturbance of soil in the metals-impacted area without DTSC notification and approval of a soil management plan or proposed soil remedy identifying a process by which metal impacts are remediated. Restricting future Site uses through institutional controls will reduce the likelihood workers will come into contact with impacted metals in soil during current or future Site operations. Restrictions will also prevent redevelopment or construction without implementing remedial actions to address the soil impacts. A monitoring program will also be set up to confirm the institutional controls are effective in mitigating potential impacts to the environment and public. Monitoring tasks may include annual assessments that verify effectiveness and thorough evaluations performed as part of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) 5-year review process.

It is anticipated that permitting, SVE pipe installation, and installation of SVE wells will require approximately 30 weeks. The SVE is planned to operate for approximately 5 years to meet cleanup objectives (remediate the Site by removing contamination in soil vapor and groundwater to the appropriate regulatory action level or a proposed target cleanup level). A decision to terminate operation of the SVE will be based on its performance and the satisfactory reduction of VOCs in soil, soil vapor, and groundwater. As such, DTSC approval will be required prior to shutting down the SVE. As mentioned previously, SSD system(s) would be installed if the vapor intrusion risks are identified at the Site and/or the adjacent residential properties. An individual SSD system would require approximately 1 week to install.

Required drilling permits and well permits will be obtained from the San Bernardino Department of Public Health, City of Ontario Building Department, and the City of Ontario Fire Department. Due to installation of additional extraction wells and upgraded extraction equipment, a new permit to construct and permit to operate for the SVE system may be required by the SCAQMD. All activities will be conducted between the hours of 7:00 a.m. to 6:00 p.m. Monday through Friday and 9:00 a.m. to 6:00 p.m. Saturday and Sunday in conformance with the City of Ontario Municipal Code (Section 5-29.09).

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 existing 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 (City of Ontario). The majority of remediation activities (e.g., SVE installation) would occur indoors and would not have the potential to negatively impact adjacent or nearby receptors, which include residential and industrial land uses. The limited number of trucks (16 total trips) and limited timeframe for activities (approximately 26 weeks) would also not have the potential to substantially impact existing truck traffic in the project area.

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

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

https://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=60001398

<u>Scarlett Zhai</u> Project Manager	<u>Senior Hazardous Substances Engineer</u> Title	<u>714-484-5316</u> Phone No.
 Branch Chief's Signature		<u>3/3/2022</u> Date
<u>Javier Hinojosa</u> Branch Chief	<u>Environmental Program Manager I (Sup)</u> Title	<u>714-484-5484</u> Phone No.

TO BE COMPLETED BY OPR ONLY

Date Received for Filing and Posting at OPR: