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: Former Mercury Cleaners, Removal Action Workplan

Project Location: 23804 Mercury Road, Lake Forest, California 92630

County: Orange

Project Applicant: Rockfield Showplace, LLC

Approval Action Under Consideration by DTSC: Removal Action Workplan

Statutory Authority: California Health and Safety Code, Chapter 6.8

Project Description: Project activities detailed in the Removal Action Workplan (RAW) include a continuation of the existing combined technologies of soil vapor extraction (SVE) and air sparge (AS), and the installation of additional wells and piping for the continued removal of subsurface tetrachloroethene (PCE) at the Former Mercury Cleaners located at 23804 Mercury Road, Lake Forest (Site). The Site is contaminated with PCE due to a release from a previous dry-cleaning business.

It is estimated that the SVE/AS system will operate for one (1) year and routine monitoring will be completed concurrently. Actual operation and monitoring duration may vary based on monitoring results.

Background: The Site is located within the Rockfield Showplace property at the southwest corner of the intersection of Mercury Road and Rockfield Boulevard (23762-23822 Mercury Road) in Lake Forest, California. The property is used as a retail center and is in an area that consists primarily of mixed commercial and residential land uses. A former dry-cleaning facility, Mercury Cleaners, operated from 1981 to 2004 in the commercial unit with the address of 23804 Mercury Road. Dry cleaning has not been performed at this shopping center since 2004, and the unit is currently vacant.

Substantial assessment and remediation activities have been conducted. Following implementation of initial remediation activities from 2014 to 2015, using the combined technologies of SVE and AS, an estimated 9.74 gallons (131.7 pounds) of PCE was extracted from the Site. This resulted in reduction of PCE concentrations in soil vapor of up to 99.9 percent and a reduction of 63 to 98 percent in groundwater, when compared to pre-remediation concentrations.

Although significant reduction of PCE in the subsurface was achieved, some rebound of PCE concentrations in soil vapor has been documented. In addition, agency-recommended screening levels for PCE have evolved since initial remediation was completed at the Site. The Proponent is therefore electing to perform additional remediation to address residual subsurface impacts related to the former dry-cleaning operations at the Site.

Regulatory Status: A Standard Voluntary Agreement, Docket Number HSA-FY18/19-150 (hereinafter referred to as the SVA), was entered into on June 12, 2019 between the California Department of Toxic Substances Control (DTSC) and Rockfield for the Site (DTSC EnviroStor ID: 60002838, Site Code: 401879). The SVA details the DTSC's role for providing oversight during voluntary additional investigation and remediation activities at the Site. This report is being submitted to the DTSC in general accordance with the SVA.

Prior to the SVA with DTSC, from approximately 2003 until 2019, previous assessment and remediation activities were conducted under the oversight of the Santa Ana Regional Water Quality Control Board (State Water Resources Control Board GeoTracker ID: SL0605971766).

Previous Investigations and Activities: Subsurface assessments have been carried out on an ongoing basis at the Site since 2003. These assessments identified the presence of PCE in indoor air, soil vapor, soil, and groundwater below the Site, as a result of operations conducted at the former dry-cleaning facility; the conceptual Site model is described in Section 3 of the RAW.

A remediation system, using the combined technologies of SVE and AS, was operated initially at the Site as a pilot test in June 2012 and full-scale from June 2014 to December 2015 to remediate the soil and groundwater and to mitigate PCE vapor intrusion. An estimated 9.74 gallons (131.7 pounds) of PCE was extracted during the operation of the remediation system. This resulted in reduction of PCE concentrations in soil vapor of up to 99.9 percent and in groundwater up to 98 percent on average, when compared to pre-remediation concentrations. After SVE influent PCE concentrations reached

asymptotic levels and minimal rebound of PCE concentrations was documented in the SVE system influent and in soil vapor probes during a rebound test in March 2016, the remediation system equipment was subsequently removed from the Site.

Although significant reduction of PCE in the subsurface was achieved, after a replacement soil vapor probe (SVP-2R) was installed, rebound of PCE concentrations in soil vapor has been documented on the north side of the structure. In addition, over the years since the initial remediation efforts, environmental agency-recommended screening levels have evolved and are now more conservative. The Proponent is therefore electing to perform additional remediation.

A network of eight groundwater monitoring wells (MW-1 through MW-8) are present on Site and downgradient of the Site and are monitored on a quarterly basis. A network of triple-nested soil vapor probes (SVP-1 through SVP-7, SVP-10 through SVP-12, and SVP-2R) and two shallow, single-depth soil vapor probes (SVP-8 and SVP-9) are also present on Site.

Project Activities: The following components will be designed and installed:

- Additional wells - A California-licensed driller with a valid C57 classification would be retained to install the following SVE and AS wells using a hollow stem auger drill rig.
    - Two triple-nested SVE wells: SVE-7, within the vicinity of soil vapor probe SVP-2R, and SVE-8, northwest of unit 23798
    - One AS well (AS-5), near groundwater monitoring wells MW-2 and MW-5
- Remediation equipment:
    - Compressor to inject ambient air into AS wells
    - Vacuum system to extract soil vapor
    - Vapor treatment consisting of vessels filled with granular activated carbon (GAC)
    - Noise control measures to meet the City of Lake Forest Noise Ordinance requirements

Piping would be used to connect the new SVE and AS wells through trenches into the existing trench area which directs piping aboveground into the vacant unit (23804). The piping would then be connected to the existing manifold within the treatment compound area, to be connected to the SVE/AS remediation equipment. The amount of conveyance piping and total feet of trenching needed will depend on the final SVE trenching and plumbing design. The surface of the trenches in front of the building would be finished with concrete or asphalt to match the existing ground surface.

An existing chain link fence and bollard poles are already installed to maintain the security of the equipment area. An appropriate electrical power connection also exists for proposed equipment. The SVE equipment (vacuum/blower, noise controls, knockout vessel, carbon vessels, and other appurtenances) will be installed within the existing, fenced remediation equipment compound. Identification tags and emergency contact information will be displayed on the remediation equipment compound.

Required Permits: The Orange County Well Ordinance (Ordinance No. 2607) requires that a permit be obtained prior to the construction of any well. Orange County Health Care Agency (OCHCA) is responsible for enforcement of the well ordinance. Rincon will obtain a “probe survey permit” from OCHCA for installation of the proposed SVE and AS wells.

In addition, pursuant to California law, the proposed drilling locations will be marked by Rincon personnel, and Underground Services Alert of Southern California (also known as DigAlert) will be notified at least 48 hours prior to commencement of field work. If utilities are located near the proposed drilling locations, Rincon will adjust the locations to avoid the utilities.

The South Coast Air Quality Management District (SCAQMD) is the regulatory agency responsible for permitting air emissions resulting from vapor extraction remediation projects. A permit to construct and operate the SVE system will be obtained from the SCAQMD, pursuant to SCAQMD Rules 201, 203, and 1401.

Some portable SVE equipment are already permitted by the SCAQMD to operate at multiple locations (“various locations” permit) and could be operated at the Site for up to 1 year; otherwise, a site-specific fixed-location permit would be required. Turnaround time for permitting can vary from less than 1 month if using an existing various-locations permit to up to 3 to 6 months to obtain a fixed-location permit.

Following completion of the removal action and in consultation with DTSC, the use of a Land Use Covenant (LUC) with Environmental Restrictions, per California Civil Code Section 1471, would be evaluated. If an LUC is determined to be required, the Proponent will work with DTSC to determine appropriate restrictions on future property use or development for the LUC. The LUC would be recorded with the County of Orange.

Although not anticipated, in the event biological, cultural, or historical resources are discovered during project activities, work will be suspended while a qualified biologist or cultural or historical resource 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 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: Rockfield Showplace, LLC

Exempt Status: Categorical Exemption: Categorical Exemption: [CCR Title 14, Sec. 15330]

Minor Actions Take to Prevent, Minimize, Mitigate or Eliminate the Release or Threat of Release of a Hazardous Waste or Hazardous Substance.

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 is a removal action that will not exceed $1 million in cost.
3. The project does not involve the onsite use of a hazardous waste incinerator or thermal treatment unit or the relocation of residences or businesses and does not involve the potential release into the air of volatile organic compounds as defined in Health and Safety Code Section 25123.
4. The project will be consistent with applicable state and local environmental permitting requirements. A permit will be needed from the SCAQMD for the SVE system and the OCHCA for the wells/probes.
5. The exceptions pursuant to Cal. Code Rags., tit. 14, § 15300.2 have been addressed as follows:

   - 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.
   - 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.
   - 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 view of a highway officially designated as a state scenic highway.
   - 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.
   - Historical Resources. The project is not expected to cause a substantial adverse change in the significance of a historical resource because none are anticipated; however, outreach to potentially interested Native American tribes is being conducted and every effort will be made to ensure any expressed concerns are addressed.

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

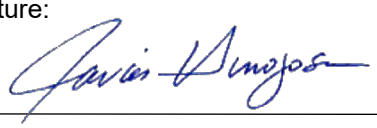
Department of Toxic Substances Control
Site Mitigation and Restoration
5796 Corporate Avenue
Cypress, California 90630

Additional project information is available on EnviroStor:

https://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=60002838

Contact Person	Contact Title	Phone Number
Greg Sweel	Senior Engineering Geologist	714-484-5413

Approver's Signature:



Date:

4/14/2022

Click or tap to enter a date.

Approver's Name	Approver's Title	Approver's Phone Number
Javier Hinojosa	Branch Chief	714-484-5484

TO BE COMPLETED BY OPR ONLY

Date Received for Filing and Posting at OPR: