

**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  
700 Heinz Avenue  
Berkeley, CA 94710

<b>Project Title:</b> Former Santa Cruz Company Lumber Removal Action Workplan		
<b>Project Address:</b> 5843 Graham Hill Road	<b>City:</b> Felton	<b>County:</b> Santa Cruz
<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): Response Plan		
<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 Department of Toxic Substances (DTSC) approved the Santa Cruz Lumber (Project Site) Removal Action Workplan (RAW). The Cleanup document, referred to as a RAW, summarized the environmental conditions at the Project Site and identified the remediation to address arsenic-contaminated soil. The RAW concluded that excavation of approximately 630 cubic yards (cy) of the arsenic-contaminated soil is required to protect human health and the environment. In addition, the RAW concluded that capping a portion of the arsenic-contaminated soil with an asphalt cap in areas with flat ground, and a vegetative cover surrounded by a fence in areas where it is too steep to install an asphalt cap is necessary to limit access to areas of arsenic-contaminated soil that won't be removed.

**Background:** The Project Site consists of approximately 60 acres: 35 acres developed with multiple buildings and lumber storage areas and approximately 25 acres of land remaining undeveloped. The Project Site is bordered by the Roaring Camp Railroad and Graham Hill Road to the east, Henry Cowell Big Trees State Park Road to the south, the San Lorenzo River to the west, and Zayante Creek to the north. The nearest residences are about 150 feet across from Graham Hill Road to the east.

The Project Site functioned as a wood treatment facility under multiple operators from 1945 to 1983. In 1983, Santa Cruz Lumber Company assumed control of the Project Site and stopped wood treatment operations with the subsequent closure of the wood treatment facility in June 1986. The wood treatment activities included pressure treating a variety of wood products with a chemical called Wood-Last, a water-based chromated copper arsenate solution. Currently, the Project Site is used for commercial and industrial purposes.

Several environmental investigations were conducted from 1986 to 2020 to identify any impacts to soil, soil vapor, and groundwater from historical lumberyard activities. The primary contaminant of concern identified is arsenic in shallow soil. Investigations indicate that arsenic from former wood treatment operations has not contaminated the shallow groundwater at the Project Site. However, the deep groundwater is contaminated with naturally-occurring arsenic which is a region-wide issue not related to the Site.

The RAW is being implemented with DTSC oversight pursuant to California Health and Safety Code (HSC) Chapter 6.8, Section 25356.1 and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) (40 Code of Federal Regulations [CFR] Part 300).

**Project Activities:** The RAW removal action to address the arsenic contaminated soil consists of the following:

1. Excavate approximately 630 CY of soil and off-site disposal as nonhazardous soil, requiring approximately 45 truckloads over four years.
2. Approximately 24.3 acres of the Project Site would be required to be capped. Of the 24.3 acres, approximately 13 acres already has an asphalt cap installed. Therefore, only 9.8 acres would require installation of a new asphalt cap and 1.5 acres require installation of fences around existing vegetative cover to prevent exposure to the arsenic-contaminated soil.
3. Ongoing maintenance and monitoring of the caps would be required to ensure the long-term effectiveness of the remedy. A Land Use Covenant (LUC) would be recorded with the County of Santa Cruz requiring long term maintenance and restricting the use of deep groundwater as a drinking water source. There would also be annual inspections and a review of the effectiveness of the remedy every five years.

The removal action will be implemented in multiple phases. To implement the encapsulation will require delivery of approximately 3,960 CY, or approximately 396 truckloads of asphalt mix, and 630 CY or approximately 45 truckloads of base rock to the Site. The removal action also requires approximately 630 CY or 45 truckloads of soil off-haul. Therefore, removal action will consist of approximately 974 hauling roundtrips over 4 years.

To assess any potential impacts to air quality, DTSC utilized the California Emissions Estimator Model (CALEEMOD) to quantify potential criteria emissions from operation of 974 truck trips. Note there will be no truck trips in 2022, 254 roundtrips in 2023, 2024, and 2025, and 212 truck trips in 2026. Total estimated nitrogen oxides (NO<sub>x</sub>) (air pollution from combustion sources like transport trucks) emissions are estimated to be 8.1 tons/year (44 lbs/day) and particulate matter less than 10 microns (PM<sub>10</sub>) is estimated to be 5.1 tons/year (27 lbs/day). The Project Site is within the Monterey Bay Air Resources District (MBARD). Based on the CEQA Guidelines from the MBARD, the only construction emissions threshold is for PM<sub>10</sub> which is 82 lbs/day. The emissions from the construction activities (19 lbs/day) are well below the threshold.

Since soil off-haul trucks (45 trips) would travel to a landfill within the Bay Area Air Quality Management District (BAAQMD), those thresholds would also be relevant. BAAQMD thresholds for NO<sub>x</sub> and PM<sub>10</sub> are 54 lbs/day and 82 lbs/day, respectively. The entire project emissions are below the thresholds. Therefore, the small number of trucks that would travel within BAAQMD boundaries result in near-negligible emissions, well below any significance thresholds.

The Project Site where the remediation will occur is in a previously developed area and does not provide habitat value. The Project Site consists of approximately 25 acres of land that will remain undeveloped. 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:** Trinity Source Group, inc. on behalf of RTP Felton Station, LLC

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. 153##]  
 Statutory Exemptions: [State Code Section Number]  
 Common Sense Exemption [CCR, Sec. 15061(b)(3)]

**Exemption Title:** Common Sense Exemption - 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:** Based on the following reasons, DTSC has determined with certainty that there is no possibility that the Project 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."

1. The site is in a previously developed area and does not provide habitat value.
2. The Project activities will not have a potential for a significant impact due to Project Controls that will be implemented during the remediation project as summarized below.
3. A California-state licensed construction contractor will conduct the construction activities. Fieldwork will be conducted following the safety guidelines provided in a site-specific health and safety plan (SSHSP) prepared specifically for the project. The SSHSP will be prepared in accordance with guidelines set forth in Title 8 of the California Code of Regulations, Section 5192 and includes but is not limited to project controls for heavy equipment safety operations, air monitoring for on and off-site emissions, personal protective equipment.
4. Site security will be established according to the type of operations, potential for exposure to contaminants, and potential for contact with other safety hazards. Site security measures that will protect the construction area and prevent unauthorized access include the following: Access will be controlled by the existing fencing, rolling gate, and structures. Only the construction crew, contractor staff, and authorized personnel will be on the Site during working hours. No unauthorized personnel will be allowed in the controlled areas of the Site. All visitors must have

prior approval from the contractor before being admitted to the Site. All visitors must read and acknowledge the SSHSP and possess documentation that they have the training necessary to enter the active work zone.

5. All construction will be conducted at least 150 feet away from the nearest resident.
6. All fieldwork will be conducted according to a SSHSP and only properly trained personnel will be employed. Licensed contractors and transporters will also be used. Prior to excavation, the Underground Services Alert (USA) will be contacted for locating specific Pipelines/conduits/electrical/phone/water/sewer, etc.
7. The community surrounding the Site will not be affected because the noise and dust levels will be controlled by engineering controls according to the Air Monitoring and Dust control Plan.

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  
 700 Heinz Avenue  
 Berkeley, CA 94710

Or on DTSC’s EnviroStor website: [https://www.envirostor.dtsc.ca.gov/public/profile\\_report?global\\_id=60002808](https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=60002808)

Jayantha Randeni Project Manager	Senior Hazardous Substances Engineer Title	(510) 540-3806 Phone No.
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 Branch Chief’s Signature	04/25/2022 Date
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Julie Pettijohn Branch Chief	Environmental Program Manager I Title	(510) 540-3843 Phone No.
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**TO BE COMPLETED BY OPR ONLY**

Date Received for Filing and Posting at OPR: