

**CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION**

To: Office of Planning and Research
State Clearinghouse
P.O. Box 3044, 1400 Tenth Street, Rm 212
Sacramento, California 95812-3044

From: Department of Toxic Substances Control
Site Mitigation and Restoration Program
Cal Center Drive
Sacramento, California 95826-3200

Project Title: Greenville - Time Critical Removal Action Work Plan

Project Location: Multiple addresses, Greenville, California

County: Plumas

Project Applicant: California Department of Toxic Substances Control (DTSC)

Approval Action Under Consideration by DTSC: Time Critical Removal Action Work Plan (TCRAWP), July 2022.

Statutory Authority: California Health and Safety Code, Sections 25355.5, subdivision (b)(3), 25358.3, 58009, and 58010.

Project Description: DTSC pursuant to the authority granted under Chapter 6.8 of the Health and Safety Code will implement a TCRAWP on approximately 125 properties in Greenville, California (Site) (see attached figure).

The main objective of the TCRAWP is to remove lead-impacted soil on properties with soil concentrations that exceed California's residential screening level of 80 milligrams per kilogram (mg/kg) for residential properties or the commercial screening level of 500 mg/kg for commercial properties to reduce and/or eliminate human exposure during and after re-construction of the Greenville community destroyed by the Dixie Fire of 2021.

The scope of work under the TCRAWP will include the removal of the top 18 inches of lead-impacted soils to prevent health impacts from exposure to lead, an imminent and/or substantial endangerment to the public health or welfare, from exposure to lead in soil, and the potential for impacted soil to migrate to adjacent land and waterways. Soil removal will occur at properties with lead levels exceeding the screening level.

An estimated 97,816 bank cubic yards of soil is expected to be excavated, loaded into trucks and transported offsite to an appropriate disposal facility. Samples will be collected at the base of the excavation, and the excavations will be backfilled using certified clean fill.

Background:

The town of Greenville has a population of about 800 residents in an area of approximately eight square miles. The town consists of both residential and commercial properties and is in the semi-mountainous terrain of Plumas County.

In summer 2021, the Dixie Fire burned a majority of Greenville's residential and commercial buildings, leaving ash, waste and debris remaining in numerous properties. In response to the Dixie Fire, Governor Newsom declared a state of emergency and signed an executive order to support impacted communities and bolster wildfire response and recovery efforts. The state secured Federal assistance through the Federal Emergency Management Agency (FEMA) to support the response in the Dixie Fire. The California Office of Emergency Services (Cal OES) led the fire response effort. California Department of Resources Recycling and Recovery (CalRecycle) was responsible for removal of ash, debris, and trees that posed a hazard under their Consolidated Debris Removal Program.

In January 2022, Cal OES and CalRecycle requested DTSC's assistance in the community of Greenville. CalRecycle had found elevated lead concentrations on properties impacted by the fire within the footprint of debris (herein referred to as the debris footprint or burn scar areas) and in soil borings collected outside of debris footprints. CalRecycle was concerned that the results appeared to indicate widespread lead contamination that was not characteristic of the burn debris. The primary metal of concern in the areas outside the burn scars is lead which was detected above screening levels in soil.

FEMA reimbursement only includes cleaning up ash and debris associated with the fire. As such, their soil removal work primarily occurred within the burn scar areas. Elevated concentrations of lead that are not fire-related could therefore not be addressed under the Consolidated Debris Removal Program. Based on analytical results obtained by CalRecycle, approximately 125 of the properties, impacted by the fire, require further action to remove contaminated soil.

To ensure the protection of public health and the environment, during and after the re-building of Greenville, California, DTSC's goal is to take timely and appropriate action to prevent exposures to sensitive populations. Through the implementation of the TCRAWP, DTSC will remove soil from properties with elevated lead and provide an 18-inch layer of clean soil that provides protection from direct contact with elevated concentrations of lead. This will allow residents to safely return to rebuild and occupy their property.

Project Activities: The work will be performed in accordance with the approved TCRAWP. The Transportation Plan, Stormwater Pollution Prevention Plan (SWPPP), and a health and safety plan described in the TCRAWP will be completed before work begins. All entities that will conduct work onsite will also provide a health and safety plan to adequately protect their personnel from exposure to direct contact and inhalation

hazards. The work will require the spraying of water as a mist on the excavation areas prior to removal to prevent fugitive dust during construction; air monitoring will be performed during all project activities to assess the adequacy of the dust controls.

Property-Specific Plans (PSPs) will be prepared for each property. The PSPs will include the property size, estimated volume of soil to be and previously excavated, and the plan for avoiding obstructions that may limit excavation work (e.g., trees, creek, asphalt pavement, concrete pads, remaining structures, and artifacts left in place at the request of the property owner).

Project activities will include the following:

- Excavation

Prior to commencing excavation activities, the utilities will be located, flagged, shut down, and replaced, if needed. Soil excavation will be conducted using standard construction equipment. Hand excavations may be conducted in proximity to remaining structures (i.e., retaining walls), utilities, or areas where access is difficult or in areas that may become damaged by equipment. Soil removal will not be performed beneath roads, sidewalks, brick patios, driveways, creeks, or other inaccessible areas. Work in the vicinity of trees will be performed under the advisement of an arborist and will take into consideration the safety of the crew. During all excavation activities, dust controls will be implemented, and air monitoring will be required. Stormwater erosion controls will be installed to prevent soil migration as required.

- Waste Management

Waste profile samples will be collected before or as part of excavation to select suitable disposal facilities. The trucks/roll-offs will proceed directly to the disposal facility after loading. Vehicles that enter the Site will be decontaminated before leaving the Site and street sweeping will be performed, as necessary. Transport vehicle departure will be scheduled when the transport vehicle has reached its limit of weight or volume. Excavated material will be transported via surface streets and highways directly to the off-site disposal facility.

- Backfill Material Import

All backfill materials will be submitted to laboratory analysis in accordance with the Department's Clean Imported Fill Material Fact Sheet and will meet DTSC's soil screening criteria before the source is determined to be acceptable. The backfill material will be transported to properties and compacted to approximately 90% compaction.

- Site Restoration

Sites will be graded to achieve designed finish grades and ensure proper site drainage. Following all finish grading, post-construction Best Management Practices will be installed in accordance with the SWPPP, including weed-free burlap-wrapped straw wattle along downgradient site boundaries. Soil tackifier will be the last site restoration activity, following demobilization of equipment and materials from the site.

Name of Public Agency Approving Project: DTSC

Name of Person or Agency Carrying Out Project: DTSC

Exempt Status: Emergency Project [PRC, Sec. 21080(b)(4); 14 CCR, Sec.15269(c)]

Reasons Why Project is Exempt: The Project consists of specific actions necessary to prevent or mitigate an emergency, determined by DTSC to be, "...an imminent or substantial endangerment to the public health or welfare or to the environment, because of the release or a threatened release of a hazardous substance..." [Health and Safety Code section 25358.3(a)].

The existence of lead in the soil that exceeded safe levels for residences was unknown prior to the testing done in the aftermath of the fire. Lead, the primary contaminant, was detected above its screening criteria in soil within and outside of the burn scar after debris removal was completed. Lead was found at concentrations of up to 3,500 mg/kg in those areas, which exceeds California's residential screening level of 80 milligrams mg/kg and the commercial screening level of 500 mg/kg. Eating soil with high levels of lead or breathing high levels of lead dust can cause lead poisoning, which can damage the brain, kidneys, liver, and other organs. Children less than six years old and pregnant women are at higher risk. Lead poisoning can affect children's growth, learning and behavior.

As a result of the fires, many of the properties have been vacant since August 2021. Property owners have submitted plans to the County to rebuild and move back to their homes and businesses in Greenville. Residents that return to their homes, construction workers, and owners, workers, and patrons of commercial properties may ingest, inhale, and have dermal contact with bare or manually disturbed soils containing elevated concentrations of lead. Modes of contact are expected to include inhaling dust during dry times of the year when it is blown about by the wind. Year-round exposure can occur when people walk through contaminated soil and carry it into their home, vehicle, or business where it can accumulate or when working or playing in the soil where ingestion can also occur. The potential for human exposure has created an urgent need to remove the lead-impacted soils during and after the re-construction of the Greenville community to avoid imminent exposure by workers and occupants.

The lead-contaminated soil could further impact the surrounding environment. Due to the mountainous terrain and high elevations, the naturally occurring accumulation of snow poses a risk of migration of on-site contaminants into the local creek and river systems, which would impact much larger downstream populations, including possibly municipal wells and drinking water systems drawing from these local watersheds. Cleanup of the Site could prevent future spread outside the Site.

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 Program
Federal Facilities Unit
8800 Cal Center Drive
Sacramento, California 95826

Additional project information is available on EnviroStor:
www.envirostor.dtsc.ca.gov/public/

Contact Person:

Kimiye Touchi
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8800 Cal Center Drive
Sacramento, California 95826-3200

Approver's Signature: *Hortensia Muniz* Date: July 26, 2022
Hortensia Muniz, P.E.
Branch Chief
Cleanup Program – Sacramento Office
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Sacramento, California 95826-3200

TO BE COMPLETED BY OPR ONLY

Date Received for Filing and Posting at OPR:

ATTACHMENT

GREENVILLE SITE FIGURE

