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
9211 Oakdale Avenue
Chatsworth, CA 91311

Project Title: Former Palace Plating – Interim Removal Action Workplan

Project Location: 710 East 29th St, Los Angeles, CA

County: Los Angeles

Project Applicant: Mr. Charles Pomeroy, Stiles Pomeroy LLP

Approval Action Under Consideration by DTSC: Interim Removal Action Workplan

Statutory Authority: California Health and Safety Code, Chapter 6.8

Project Description:

The Department of Toxic Substances Control (DTSC) approved an interim removal action workplan for the former Palace Plating facility (Palace) at East 29th St, Los Angeles, Los Angeles County, California. The proposal is to utilize soil vapor extraction (SVE) to treat in-situ soil impacted by site-derived volatile organic compounds (VOCs) to approximately 65 feet below ground surface (bgs) ("shallow soil zone"). This shallow soil zone has been termed Operable Unit 1 (OU-1) for convenience . Other on-site shallow soil constituents-of-concern and soil deeper than 65 feet bgs has been termed OU-2 and will be addressed together with ground water in the future. The estimated radius of vacuum influence (ROVI) would include the southern portion of the 28th Street School located across the street to the north from Palace where there is documented influence from Palace-derived VOCs. The SVE system will be comprised of trailer-mounted extraction equipment, emissions treatment equipment, 32 extraction wells and a vadose zone monitoring system. This interim removal action is described in "Remedial Action Work Plan for OU-1, Former Palace Plating Facility" dated March 10, 2016. DTSC is seeking to implement this interim removal action in order to reduce Palace-derived VOC concentrations in OU-1 to acceptable health-based risk levels (industrial for Palace proper and residential for the southern portion of the School). This can be done quickly compared to an overall final remedy but would clearly contribute to the goals of a final remedy.

The extraction equipment consists of a blower capable of 500 standard cubic feet per minute (scfm), above-ground piping manifold, and a vapor/liquid separator. The extraction wells would be constructed of 2-inch diameter PVC, with eight wells (one existing and seven proposed) screened from 5 to 10 feet bgs, eight wells (one existing and seven proposed) screened from 15 to 25 feet bgs, eight wells screened from 25 to 40 feet bgs, and eight wells screened from 45 to 65 feet bgs. The wells would be connected to the extraction equipment via aboveground 3-inch diameter PVC piping. The emissions treatment equipment would include two canisters, each containing 1,000 pounds of vapor-phase granular activated carbon. Concentrations of VOCs in soil vapor will be monitored before and during SVE system operation to document the remedial effect.

Background:
Electroplating operations began at the former facility in the 1920's and has been known as Palace Plating since 1952. Palace ceased operations in December 2011 and removed all tanks, tank contents, raw materials, and hazardous materials by March 2012. The former facility consists of two vacant buildings of concrete block and corrugated metal construction. The vacant property boundaries are secured by building walls or chain-link fencing topped with barbed wire.

The former Palace facility encompasses approximately 13,000 square feet and is zoned for industrial use. The facility is bounded to the north by E. 29th Street followed by the School, to the south by an MTA right-of-way followed by property used for food truck storage, to the west by commercial property, and to the east by a fenced parking lot.

In 1985, approximately 12 cubic feet of metal-impacted soil were removed from the northwestern portion of the parking lot adjacent to Palace by order of the Los Angeles County Health Department. Five Investigations were subsequently performed at Palace between 2007 and 2012. These include soil, soil vapor, and groundwater sampling and an SVE pilot test.

The Maximum Historic Concentrations of PCE and TCE detected beneath the Former Palace Facility to 65 ft bgs

Soil to 0 to 65 feet	PCE = 150 ppb	TCE = 19 ppb
Soil Gas 0 to 65 feet	PCE = 1000 µg/L	TCE = 23 µg/L
Groundwater approx.. 225 feet bgs	PCE not detectable	TCE = 27 µg/L

The Proposed Cleanup Goal for the former Palace Plating facility is Industrial/Commercial Use (Based on a post remediation Human Health Risk Assessment).

The most recent soil vapor sampling performed in 2012 at the 28th Street School indicated that perchloroethylene (PCE) concentrations in OU-1 ranged up to 140 ug/l (at the 25-foot depth) and up to up to 200 ug/l (at the 45-foot depth. Interim mitigation measures were implemented in the school bungalows across 28th Street to ensure they were safe for occupancy, including: modifications/adjustments to the heating, ventilation, and air conditioning systems; installation of crawl space ventilation systems beneath the affected bungalows; and the installation of carbon air purification units in selected classrooms. Sampling was conducted following the implementation of each mitigation measure to determine its effectiveness in reducing indoor air PCE concentrations. In 2009, LAUSD implemented a program that included annual monitoring of the 14 bungalow classrooms that did not exceed the PCE health-based risk level, and quarterly monitoring of the 12 bungalow classrooms that exceeded the PCE health-based risk level. In November and December 2010, LAUSD removed or demolished the 12 affected bungalows that exceeded the PCE health-based risk number. On May 5, 2011, DTSC approved a revised monitoring program for the remaining bungalow classrooms. The 7 $\mu g/m^3$ screening level (set by DTSC) has not been exceeded in any of the remaining bungalows since September 2008.

Project Activities:

1) Twelve dual-nested vapor extraction wells (existing or to be installed) would comprise the in-ground portion of the SVE system.
2) The above-ground portion of the SVE will include a trailer-mounted motor, blower and knock out tank will receive influent from vapor extraction wells and send it through GAC canisters prior to venting as permitted by the South Coast Air Quality Management District (SCAQMD).
3) The operation of the SVE system will be accompanied by periodic monitoring of VOC concentrations as measured in the system influent, extraction wells, and individual soil gas monitoring probes. Seventy-four probes comprise the soil gas monitoring probe array.
4) The SVE operation will optimized to extract soil vapor from the wells and specific depths with the highest VOC concentrations.
5) When site-derived VOC concentrations beneath the affected portion of the school have decreased below acceptable health-based risk levels for residences, the SVE system will be temporarily shut down to perform a rebound test to evaluate the SVE effectiveness.
6) Site Activities will be conducted in accordance with a site-specific Health and Safety Plan that complies with Title 8, California Code of regulations, Section 5192.

In the event biological, cultural or historical resources are discovered in the course of project activities, work will be suspended while a qualified biologist, cultural or historical 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 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: Charles Pomeroy, Stiles Pomeroy LLP

Exempt Status: Categorical Exemption: [Title 14 Section15330]

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 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 25123.6 (except a small scale in-situ soil vapor extraction and treatment system which have been permitted by the local Air Pollution Control District or Air Quality Management District).
4. The project is consistent with applicable state and local environmental permitting requirements including, but not limited to, off-site disposal, 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. Prior to implementing field activities, all necessary permits will be obtained from SCAQMD.
5. The exceptions pursuant to Cal. Code Regs., title 14, § 15300.2 have been addressed as follows:
    (a) 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.

(b) 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.
(c) 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 a highway officially designated historic as a state scenic highway.
(d) 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.
(e) Historical Resources. The project will not cause a substantial adverse change in the significance of a historical resource at the Site because there are none at the Site

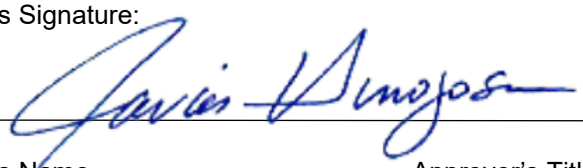
The administrative record for this project is available to the public by appointment at the following location:

Department of Toxic Substances Control
Site Mitigation and Restoration Program
9211 Oakdale Avenue
Chatsworth, California 91311

Additional project information is available on EnviroStor:
www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=19340646

Contact Person	Contact Title	Phone Number
Don Indermill	Project Manager	(818) 717 6561

Approver's Signature:



Date:

September 23, 2022

Approver's Name	Approver's Title	Approver's Phone Number
Javier Hinojosa	Branch Chief	(818) 717-6539

TO BE COMPLETED BY OPR ONLY

Date Received for Filing and Posting at OPR: