

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: 410 E 32nd Street & 317 E. 33rd Street, Los Angeles, California

Project Location: 410 E 32nd Street & 317 E. 33rd Street, Los Angeles, California, 90011

County: Los Angeles

Project Applicant: Union Pacific Railroad (UPRR)

Approval Action Under Consideration by DTSC: Removal Action Workplan

Statutory Authority: California Health and Safety Code, Chapter 6.5

Project Description: The Department of Toxic Substances Control (DTSC) approved the 410 E32nd Street & 317 E. 33rd Street, Los Angeles (Project Site) Removal Action Workplan (RAW) located at 410 E32nd Street & 317 E. 33rd Street, Los Angeles. The removal action includes remediation of Volatile Organic Compounds (VOCs) in vadose zone soil vapor with Soil Vapor Extraction (SVE) technology followed by long term monitoring and recordation of a Land Use Covenant (LUC). The SVE program is intended to reduce the subsurface mass to the extent possible and thereby reducing the vapor intrusion threat.

Background: The Project Site is approximately 16,000 square feet and is occupied by three interconnected, one-story warehouse/light manufacturing buildings totaling approximately 14,300 square feet. There is limited occupancy within the buildings. The area surrounding the site is mostly used for residential and commercial purposes. There are single-family homes to the east and north and commercial and light manufacturing properties to the south, west, and north.

Development of the site dates back to 1906 and includes industrial and commercial use since at least the early 1920's. Such uses include machine shop/foundry, beverage manufacturer, beverage bottler, woodworking factory, and furniture factory with spray booths. Since 1960, land uses have included furniture manufacturing, carburetor rebuilding shop, auto parts rebuilding facility, sewing factory, and textile manufacturing. Permits were issued to Production Clutch Exchange and Specialty Carburetor Corporation for operation of a wastewater clarifier and vapor degreaser.

In 2014, a Phase I Environmental Site Assessment identified the presence of PCE may pose a potential vapor intrusion concern and recommended a VI risk assessment. PCE and TCE were found at concentrations exceeding VI SLs in soil vapor at the site. Additional investigations have been performed to delineate the extent of VOC contamination and continue to the present day.

On March 26, 2019, DTSC issued an Imminent and Substantial Endangerment Order (Docket No.: HSA-FY 18/19-014) to assess and remediate the VOC impacts at the Project Site. A SVE Pilot Test was begun in 2019 to evaluate whether SVE could be used for full scale remediation and to provide temporary mitigation of VI risk for the adjacent homes. A Remedial Investigation was performed in parallel to assess potential risks to the current occupants of the Site and adjacent properties. The RI identified the presence of elevated levels of VOCs in soil and soil vapor. An indoor air quality survey was conducted at the Project Site and homes and businesses nearby. Sampling results indicated concentrations of VOCs in indoor air above screening levels, which decreased with ongoing operation of the Pilot Test.

Project Activities: The project activities consist of continued long-term operation of the SVE system installed for the Pilot Test, and possibly the addition of wells if assessment data indicate they are necessary. The system will be operated continuously until such time as PCE concentrations in shallow soil vapor and subslab vapor are reduced to concentrations where VI can no longer cause significant adverse effects to indoor air. The system may be switched to pulsed operation at that time.

Monitoring will be conducted to document system operations, to comply with SCAQMD reporting requirements, and to evaluate the effectiveness and protectiveness of the system. Monitoring will consist of recording operating pressures, flow rates, and VOC concentrations as measured with a PID. Analytical samples will be collected per the SVE Pilot Study Work Plan.

The goal of the remediation activities is to minimize or eliminate the existing potential human exposure to PCE and trichloroethane (TCE) in soil and soil vapor on the Site, reduce human health-based risks associated with PCE and TCE contamination to a level that is acceptable for commercial use at the Site and residential use at surrounding properties, reduce the source of contamination to minimize future possible impacts to groundwater and recordation of a LUC.

The RAW will be implemented immediately upon approval. Specific enforceable environmental safeguards and monitoring procedures will be made a condition of project approval to ensure that impacts to the environment are less than significant. During implementation, the system will require air monitoring for effluent levels and indoor air spaces where receptors are present.

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: Union Pacific Railroad

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 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. Although the site is on the Hazardous Waste and Substances Sites List (Cortese List), the activities are designed to remediate the site.
2. The site is in a previously developed area and does not provide habitat value.
3. In addition, the activities will have no potential for a significant impact due to project controls that will be implemented during the project as summarized below.
 - A California-state licensed construction contractor will conduct any additional drilling activities associated with possible future expansion of the SVE system which has been installed for the Pilot Test. 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 was 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, and controls of open trenches for worker safety as described below.
 - Well drilling activities will be conducted by California-licensed contractors in accordance with permits acquired from the Los Angeles County Department of Public Health, Environmental Health Division, Drinking Water Program. The Pilot Test system is currently operating under a Site-Specific Permit To Operate (PTO) from South Coast Air Quality Management District. If required, construction permits will be obtained from the City of Los Angeles Building Department.

- 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, Jacobs, and DTSC 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.
 - Sound attenuation is provided by the walls of the building itself and by sound-attenuating blankets installed around the air handling equipment. Effluent piping outlets have been routed to a location which is 92 feet away from the nearest residence.
 - 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 trenching, the Underground Services Alert (USA) will be contacted for locating specific Pipelines/conduits/electrical/phone/water/sewer, etc.
 - Vapor discharge from the treatment system will comply with emission standards specified in South Coast Air Quality Management District Rule 1166.
 - The community surrounding the Site will not be affected because the noise and dust levels will be controlled by engineering controls.
4. DTSC submitted a Sacred Lands file search to the Native American Heritage Commission (NAHC) and received no requests for consultation regarding the project.
- Evidence to support the above reasons is documented in the project file record, available for inspection at:

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

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

Contact Person	Contact Title	Phone Number
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Approver's Signature:



Date:
 December 06, 2022

Approver's Name	Approver's Title	Approver's Phone Number
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TO BE COMPLETED BY OPR ONLY

Date Received for Filing and Posting at OPR: