

**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 & Restoration Program  
9211 Oakdale Avenue  
Chatsworth, CA 91311

Project Title: Former Blue Coral Inc, McKay Chemical Division – NP Randolph LLC Interim Measures Workplan

Project Location: 1920 Randolph Street and 5920-5922 Wilmington Ave, Huntington Park, California 90001

County: Los Angeles County

Project Description: The Department of Toxic Substances Control (DTSC) approved the Former Blue Coral (Project Site) Interim Measures Workplan and Interim Remedial Action Plan (IRAP) located at 1920 Randolph Street, Huntington Park. The project includes excavation of 400 cu yd of shallow soil impacted by metals consisting of Lead, Arsenic, Cadmium, Copper and excavation of 250 cu yd soil impacted by total petroleum hydrocarbons (TPH), and volatile organic compounds (VOC) under an Interim Measures Workplan (IMWP). In addition, a vapor intrusion mitigation system (VIMS) barrier with sub-slab ventilation shall be installed as part of the redevelopment of the property into a self-storage facility.

Background: The Project Site is approximately 3.3 acres and consists of ten buildings and additional structures that once were part of McKay Chemical Facility (1958-1986) and Blue Coral Inc. (1986-1995). Currently the property is vacant, but previously Full Circle Recycling, Diesel Dynamics, LA Felt Co., And MACA Wood Products occupied the space.

Previous operations included blending and packaging of chemicals to manufacture household cleaning and automotive maintenance products. The facility was subject to regulation under the Resource Conservation and Recovery Act (RCRA) and the site had several underground and above ground storage tanks. Shell Oil Products US (SOPUS) entered into a Corrective Action Consent Agreement (CACA) with DTSC in February 2010. Historically the tanks structures were removed and remediated under the Regional Water Quality Control Board (RWQCB) oversight in the 1990's. Field investigations conducted under the CACA with DTSC oversight identified Volatile Organic Compounds (VOC) sources namely Perchloroethylene (PCE) and Trichloroethylene (TCE) continue to exist at the Project Site in the vicinity of the former underground storage tank area. Groundwater has been impacted by PCE and TCE from former operations and there is a track of soil vapor from surface to groundwater from former on-site operations.

NP Randolph, LLC (NPP) is the current owner of the Site. They envision redevelopment of the property to house a new self-storage facility. In November 2021, NPP entered into a Facility Initiated Corrective Action (FICA) agreement with DTSC that will oversee the remediation of shallow metal, VOC and TPH impacted soil, and the installation of a VIMS. As part of the redevelopment, contingency for a SVE system installation has been included in their cleanup plan, should SOPUS not perform in a timely manner.

The City of Huntington Park filed a Categorical Exemption, Class 32 "Infill" on May 4, 2021, for the Randolph Self Storage Project.

Project Activities: The project activities include excavation of 650 cu yd of shallow soil impacted with metals Lead, Arsenic, Cadmium, Copper, TPH and VOC from the Site. The project includes installation of a vapor intrusion mitigation system (VIMS) that will be installed as part of the new construction. As part of construction, infrastructure for a Soil Vapor Extraction (SVE) system shall be installed below the new building. The SVE system pilot test, design and operation are the responsibility of Shell Oil Products US (SOPUS) under the corrective action consent agreement, and should SOPUS does not timely complete the activities, the system shall be installed by NP Randolph, LLC (NPP) as part of their reconstruction activities.

The infrastructure for a deep soil vapor extraction (SVE) system to be placed below the new self-storage facility would be installed as part of this Interim Remedial Action Plan (IRAP). The IRAP includes necessary design and installation of a full scale SVE system as an interim remedial measure and includes a VIMS to provide long term protection to Site occupants both during implementation of SVE and following completion. The operation of the SVE system would be under an Interim Measures Workplan for the corrective action consent agreement signed with Shell Oil Products US (SOPUS). In the event SOPUS does not complete the SVE pilot test, design, and installation of the full scale SVE system following approval by DTSC, NP Randolph (NPP) may elect to complete the SVE pilot test, design and installation of SVE system. The interim removal of contaminated soil, and the installation and operation of the SVE would be part of the soil remediation for the Site. Groundwater remediation would be a separate phase that would be undertaken by SOPUS at a later date.

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: NP Randolph, LLC

Exemption 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: [State type and section number]  
 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. The Project Site is located in a previously developed area surrounded by an urbanized mix of land uses.
2. The Project Site does not provide habitat value.
3. The Project activities will have no potential for a significant impact due to project controls that will be implemented during the project as summarized below.
4. A California-state licensed construction contractor will conduct any additional drilling activities associated with possible future installation of the SVE system. 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,
5. 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,

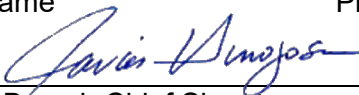
Drinking Water Program. The Pilot Test system will operate under a Site-Specific Permit To Operate (PTO) from South Coast Air Quality Management District. If required, construction permits will be obtained from the City of Los Angeles Building Department.

6. 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, 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.
7. Sound attenuation is provided by the fencing and by sound-attenuating blankets installed around the air handling equipment. Effluent piping outlets would be routed to a location which is greater than 800 feet away from the nearest residence.
8. 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.
9. Vapor discharge from the treatment system will comply with emission standards specified in South Coast Air Quality Management District Rule 1166.
10. The community surrounding the Site will not be affected because the noise and dust levels will be controlled by engineering controls.

Evidence to support the above reasons is documented in the project file record, available for inspection at the:

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

[https://envirostor.dtsc.ca.gov/public/profile\\_report.asp?global\\_id=80001575](https://envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=80001575)

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**TO BE COMPLETED BY OPR ONLY**

Date Received For Filing and Posting at OPR: