Department of Toxic Substances Control

Yana Garcia
Secretary for
Environmental Protection

Meredith Williams, Ph.D., Director
5796 Corporate Avenue
Cypress, California 90630

Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

June 9, 2023

Ms. McKina Alexander
City of Carson
Community Development Department, Planning Division
701 East Carson Street
Carson, California 90745
MAlexander@carsonca.gov
planning@carsonca.gov

DTSC COMMENTS ON THE INITIAL STUDY/MITIGATED NEGATIVE DECLARATION FOR THE FIGUEROA STREET BUSINESS PARK PROJECT, 20601 SOUTH MAIN STREET, CITY OF CARSON, LOS ANGELES COUNTY – STATE CLEARINGHOUSE NUMBER: 2023050278

Dear Ms. Alexander:
The Department of Toxic Substances Control (DTSC) reviewed the Initial Study/Mitigated Negative Declaration (IS/MND) for the Figueroa Street Business Park project, located at 20601 South Main Street in Carson, California (Site). The project is proposed by Carson Main Street, LLC, a California limited liability company.

The proposed project consists of the remediation of the former landfill and development of a business park campus in accordance with the proposed Figueroa Street Business Park Specific Plan. The Specific Plan includes two planning areas that encompass the 14.42-acre site: Planning Area 1, which would accommodate business park uses; and Planning Area 2, which would accommodate general commercial/retail uses. Planning Area 1 would allow development of up to three structures (proposed Buildings 1 through 3) totaling

309,266 square feet of building area. Planning Area 2 would consist of a single 4,000 square foot structure (Building 4). The project also proposes on-site surface parking and landscaping associated with the new business park development.

The remediation of a portion of the former Gardena Valley Landfill 1&2 will be implemented in coordination with DTSC. DTSC is reviewing the draft Response Plan, which is the technical document identifying the required remedial activities.

DTSC and Carson Main Street, LLC entered into a California Land Reuse and Revitalization Act (CLRRA) Agreement (Docket No. HSA FY-20/21-137) on June 9, 2021, for the assessment and remediation of the Site, so that Carson Main Street, LLC may qualify for immunities afforded under the CLRRA.

The following comments have been provided by the DTSC Site Mitigation and Restoration Program (SMRP) project management team and the Office of Engineering and Special Projects (ESPO).

DTSC SMRP provides the following comments:

1. Global Comment. The draft Response Plan is described and referenced throughout the IS/MND. DTSC notes that the draft Response Plan has not received DTSC approval and is subject to change. This should be clarified throughout the text where the draft Response Plan is discussed.
2. Global Comment. DTSC historically divided the Site into two operable units (OUs), a Wastefill OU and a Groundwater OU. To support expedited redevelopment of the Site, DTSC agreed to allow the initial remedial action, defined in a Wastefill OU Response Plan, to focus on the vadose zone, based on the understanding that groundwater remediation does not need to be completed to facilitate safe development and use of the Site. However, Site impacts to groundwater have not been characterized and it is unknown whether the waste material has current or future potential impacts to groundwater which could spread to off-Site receptors after remediation of the Wastefill OU. Therefore, initiation of the groundwater investigation comprising a schedule for the development and implementation of a Groundwater OU Remedial Investigation workplan will be necessary prior to DTSC approval of a Wastefill OU Response Plan. Furthermore, DTSC recommends that a groundwater

remedial investigation be initiated prior to Site development to avoid damaging the proposed engineered cap that will be in place after remediation of the Wastefill OU and Site development.

3. Exhibit 2-3b is titled “Site Remediation – Engineered Landfill Cap”. DTSC recommends this figure be renamed “Site Remediation – Conceptual Engineered Landfill Cap” to clarify that this design has not been approved by DTSC and is subject to change.
4. Section 2.4.1 Site Remediation, page 2-4. Paragraph 1 states “Future remedial action on the Groundwater OU would be coordinated with DTSC and would likely be initiated with a monitoring program.” DTSC agrees that remedial action to address the Groundwater OU will be coordinated with DTSC. DTSC notes that the program would be initiated with an investigation/characterization program, not a monitoring program.
5. Section 2.4.1, Landfill Gas Monitoring and Operations and Maintenance, page 2-8. In addition to surface and perimeter monitoring, off-Site landfill gas monitoring may also be required to ensure off-Site migration of landfill gas does not impact near-by residences and buildings.
6. Section 4.8 Greenhouse Gas Emissions, Short-term Remediation and Landfill Gas, page 4.8-7. The first paragraph indicates that permitting requirements could include Rule 1150 for landfill excavation activities and Rule 1166 for earthwork involving volatile organic compound (VOC)-impacted soils. DTSC understands that South Coast Air Quality Management District (SCAQMD) Rule 1150 and Rule 1166 *would* be permit requirements for the proposed project.
7. Section 4.9 Potential Accidental Conditions During Site Construction, Soil and Soil Gas Impacts, page 4.9-6. This section states that implementation of the draft Response Plan will reduce “…potential accidental conditions involving existing contaminated soil and soil gas at the project site… to less than significant levels.”
    a. DTSC has not yet approved the Response Plan for this Site and DTSC does not agree that implementation of the draft Response Plan, prior to DTSC approval, will necessarily reduce these conditions to less than significant. DTSC recommends clarifying that the work will not proceed until the Response Plan has been approved by DTSC.

b. The remedy described in the draft Response Plan protects future on-Site workers and construction workers but does not protect against releases or exposures that could impact workers and the community during the remediation and development activity. To protect against releases during the work, all Site work that includes soil and waste disturbance (both remediation and development activities) should be conducted under a DTSC-approved Soil Management Plan (SMP). An SMP has been submitted and is currently under DTSC review. Additionally, all soil and waste disturbance activities should be conducted under a Site Health and Safety Plan prepared in accordance with Occupational Safety and Health Administration regulations, 29 CFR 1910, with air monitoring performed in accordance with DTSC Community Air Monitoring Plan (CAMP) guidance and the appropriate SCAQMD permits.

8. Section 4.9, b) Groundwater
    a. Page 4.9-4, Second Paragraph. This states that the impacts reported in groundwater at the Site are “unlikely to have been caused by the former landfill uses of the Site.” Later in this section, groundwater impacts from near-by Superfund Sites are described as a possible source for the impacts to groundwater beneath the Site. The source and distribution of groundwater impacts at the Site have yet to be fully investigated, and it is yet to be determined what impacts the Site has had on groundwater. DTSC’s approval of the Response Plan for the Wastefill OU will be contingent upon characterization of groundwater at the Site.
    b. Page 4.9-5, First paragraph, last sentence. This states “Future remedial action on the Groundwater OU would be coordinated with DTSC and would likely be initiated with a monitoring program.” DTSC agrees that remedial action to address the Groundwater OU will be coordinated with DTSC. DTSC notes that the program would be initiated with an investigation / characterization program, not a monitoring program (see comment 4 above).
9. Section 4.9 Potential Accidental Conditions During Site Construction, Groundwater Impacts, pages 4.9-6 to 4.9-7.

a. DTSC notes that groundwater was identified at depths from 40 to 50 feet below ground surface (bgs), and the development would require installing pilings to approximately 60 feet bgs. Pilings will provide a potential preferential pathway for landfill leachate infiltration to groundwater that could cause an incidental impact to Site groundwater, with the potential to reach downgradient receptors. The section should describe how this potential impact will be mitigated during construction and into the future.
b. This section indicates that dewatering under Order No. R4-2018-0125, NPDES No. CAG994004 requirements would ensure that impacts from discharge of dewatering are reduced to less than significant levels. It is DTSC's understanding that the occurrence of toxic compounds and their concentrations in the groundwater must be adequately characterized to determine whether groundwater is eligible for discharge under this NPDES permit and whether the water must be treated prior to discharge. To DTSC's knowledge, groundwater data have not been collected from the Site in over 30 years and groundwater characterization was never completed for the Site. DTSC notes that it is to-be-determined whether the proposed NPDES permit will be sufficient to reduce impacts of groundwater dewatering to less than significant, until groundwater has been characterized at the Site.

10. Section 4.9, Potential Accidental Conditions During Site Construction, Import/Export of Potentially Contaminated Materials, page 4.9-7.
    a. This paragraph states that "Implementation of the proposed project could require the import/export of fill materials…." DTSC notes that the proposed project *would* require the import and export of fill and potentially contaminated materials.
    b. This paragraph concludes that "With implementation of the Draft SMP, impacts… would be reduced to less than significant." The draft SMP has not been approved by DTSC. DTSC does not agree that implementation of the draft SMP, prior to DTSC approval, will necessarily reduce these conditions to less than significant. DTSC recommends clarifying that the work will not proceed until the SMP has been approved by DTSC.

11. Section 4.9, Potential Accidental Conditions During Site Construction, Vapor Intrusion, page 4.9-7.
    a. The last sentence of the first paragraph implies that the building protective systems will alert building occupants in the event of detection of chemicals of potential concern. DTSC notes that the building protective systems only include an alarm for methane, and methane would serve as an indicator to warn of the potential occurrence of other chemicals of concern. The building protective systems do not include an alarm for chemicals of concern other than methane. DTSC recommends revising the wording for clarity.
    b. The second paragraph, second sentence describes passive venting systems under all hardscape. DTSC notes that the conceptual engineered landfill cap also includes a passive venting layer under all landscaped surfaces on the Site, as well. Please clarify in the text that passive venting systems will be under both hardscape and landscape areas on Site.
12. Section 4.10, Hydrology and Water Quality. The IS/MND identifies a less than significant impact in response to question a) *"Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?*" However, the discussion appears to consider only potential impacts to surface water, with no consideration of impacts to groundwater. As described in this section, the proposed development would include installing pilings to approximately 60 feet bgs, while groundwater has been identified from approximately 40 to 50 feet bgs. Therefore, pilings would be installed through the shallowest water bearing zones beneath the project Site and would create potential preferential flow pathways from the waste prism into groundwater. This section should address the development's potential impacts to groundwater.

DTSC ESPO provides the following comments:

1. Cover Page. The cover shows medium-sized trees and what appears to be significant shrubbery as well as areas of sod. A list of possible landscape trees, shrubs and ground cover is included in the Landscape Design section on page 2-16. The currently proposed tree wells, as shown in the conceptual drawings in

Exhibit 2-3b (pdf page 19 of 182), are relatively small and unlikely to support the proposed tree sizes and density due to the extensive rooting depth required.

2. Section 2.2 Environmental Setting. The first paragraph describes the site as "currently vacant, disturbed land (formerly part of the Gardena Valley Landfill No. 1 & 2, a Class II landfill)" This description does not accurately convey the current site condition as a closed Class II landfill. Although the site is not developed with structures, the description should convey that the site contains waste, which may include hazardous waste, overlain by a soil cover (including waste depths and cover thickness), similar to the description provided in Section 2.3, Background and History.
3. Table 2-3 lists permitted uses for the Site. DTSC notes that land use restrictions will be part of the final Response Plan and will prohibit future uses on the Site, including use for residences, a hospital for humans, a public or private school for persons under 21 years of age, or a day care. The land use restrictions will also specify other activities prohibited on the Site.
4. Section 2.4.1, Site Remediation, page 2-5, first bullet. This text says that during arsenic investigation, a soil cover will be maintained to prevent uncontrolled landfill gas surface emissions. DTSC does not concur with this statement – it is unlikely that landfill gas emissions would be significantly affected by a soil cover. In addition, how would a soil cover be maintained if arsenic requiring removal extends to the top of the waste? Furthermore, grading and utility installation activities during development appear to require removal of soil cover. How will landfill gas emissions be prevented during development?
5. Section 2.4.1, page 2-8, bullet 2, Building Protective System describes a trench vapor cut-off barrier. It is unclear whether this approach is consistent with the description of the VIMS design in the draft Response Plan. Please provide additional detail for DTSC to evaluate whether the description is consistent with the VIMS system in the draft Response Plan.
6. Section 2.4.1, page 2-5, second bullet, Engineered Cap. This paragraph refers to the building floors being slab-on-grade; in fact, they are built on sheet piles.
7. Section 2.4.1, page 2-8, hardscape venting system. This paragraph describes the system as follows: "…below-grade collection pipe and risers located below

the engineered landfill cap." This is not correct. The risers are surface mounted and rise above the hardscape and vent to the atmosphere.

8. Section 2.4.2. Proposed Project, page 2-18, third bullet describes an underground stormwater collection basin. Underground or surface impoundment of stormwater would be contrary to regulatory requirements for landfill covers/caps, which requires no ponding of water on the cover. In addition, storm drainpipes that are likely to introduce water into the landfill are likely to create leachate which could impact groundwater. Design details for any catch basins/water retention basins that could introduce water to the waste prism should be provided to DTSC for review and approval prior to implementation.
9. Section 2.4.2 Proposed Project. Fences and Walls (page 2-16). The text indicates that maximum 8-foot wrought iron security fencing and concrete masonry retaining walls of various heights not exceeding eight feet will be located along portions of the site boundaries. The fences are likely to require deep/deepened foundations. It is not clear how such foundations will be constructed where they will be located in waste areas.
10. Section 2.4.2 Proposed Project. Electric (page 2-19). The text states that underground electric lines on-site will either be pile-supported or designed with sufficient flexibility to accommodate several feet of differential settlement. The text should discuss if there are any concerns installing underground electric lines in an area with significant methane emissions, and how to address them.
11. Section 2.5 Phasing/Construction. Second paragraph, third sentence states that flatwork may be supported on the surficial 6- to 7-foot-thick fill layer overlying the waste. However, we note that the design minimum foundation layer thickness is 22 inches and cover thickness in landscape areas is shown as about 21 inches, including 12 inches of vegetative layer. It is therefore likely that some flatwork areas will not have 6 to 7 feet of fill unless the minimum foundation layer is adjusted accordingly.
12. Section 2.6 Agreements, Permits, and Approvals. This section identifies DTSC approving the Response Plan, the Los Angeles County Department of Public Health as reviewing and approving the landfill cap final design, landfill gas mitigation system final design, and closure/reinstallation of monitoring wells, and

CalRecycle as approving the landfill cap final design plan and landfill gas mitigation systems. All these features are also under the purview of DTSC and as such should also be reviewed and approved by DTSC, either as part of the Response Plan or separately.

13. Section 4, Air Quality
    a. ESPO notes that the soil cover covering the waste is described as having different thicknesses in different portions of the text.
    b. ESPO notes that this section should recognize that air monitoring during soil and waste disturbance would be conducted in accordance with DTSC's CAMP guidance.
    c. Adherence to SCAQMD rules 1066 and 1466 (for arsenic) during soil handling Section should be discussed.
    d. Sensitive Receptors (page 4.3-13). The text in the first paragraph states that "receptors were modeled with 100-meter (82 feet) by 100-meter (82 feet) grid spacing…….". The conversion from meters to feet is in error; 100 meters is approximately 328 feet. The text should be revised and the actual grid spacing used verified. Also, it is not clear if the health risk modeling considers the expected landfill VOC and methane emissions.
14. Short Term Remediation (page 4.3-16). The text only identifies elevated arsenic concentrations in cover soils and states that 12 cubic yards will be removed. DTSC notes that previous investigations identified other chemicals of concern, such as pesticides, PCBs, etc. locally in existing cover soils. The text should discuss presence of these other chemicals in cover soils.
15. Section 4.9. How will workers be protected from landfill gases during excavation of arsenic and construction? This is not addressed in the IS/MND. The IS/MND should refer to a site-specific Health and Safety Plan.
16. Section 4.7, Geology and Soils. The discussion regarding strong seismic shaking. This section should also discuss effects of an earthquake on underground utilities (e.g., pipe breakage) and landfill gas collection system (underground piping).
17. Section 4.7, Geology and Soils. Discussion regarding seismic-related ground failure, including liquefaction. This discussion refers to a depth to groundwater of

95 feet. On page 8 of the geotechnical report, it states that groundwater is likely to be 44 to 43 feet deep, yet on page 9, in the liquefaction section, it states that groundwater was not encountered at depths of 85 feet. Please clarify the depth of groundwater at the Site as well as the highest anticipated groundwater level at the site and whether that influences the liquefaction analysis.

18. Section 4.9 Hazards and Hazardous Materials. Former Operations of Gardena Valley 1 & 2 Landfill (page 4.9-4). The eighth sentence in the first paragraph states that the minimum landfill soil cover thickness observed is 4.25 feet thick. However, previous investigations have indicated that the minimum existing soil cover thickness may be about 18 inches. The text should be reviewed against all previous site investigation data and revised for consistency.

19. Section 4.8-1, Greenhouse Gas Emissions. Post-development methane venting from the landfill does not appear to be accounted for in the greenhouse gas emissions. The sections should provide consideration for whether development will impact long term methane emissions. Additionally, what consideration will be given to high methane concentrations vented to the atmosphere? Will a permit from SCAQMD or treatment be required?

DTSC appreciates the opportunity to provide comments on the Draft Figueroa Street Business Park IS/MND. Please contact me at clayton.larkins@dtsc.ca.gov or (657) 777-9816 if you would like to discuss.

Sincerely,

Clayton Larkins, PG
Project Manager
Site Mitigation and Restoration Program

Christine P. Brown 6/9/23

Christine Brown, PE
DTSC - Hazardous Substances Engineer
Engineering and Special Project Office

cc:

Candace Hill
DTSC - Senior Environmental Planner
Site Mitigation and Restoration Program
candace.hill@dtsc.ca.gov

Peter Gathungu, PE, GE
Hazardous Substances Engineer
Engineering and Special Project Office
peter.gathungu@dtsc.ca.gov

A. Edward Morelan, PG, CEG
Cypress Clean-up Branch Chief
Site Mitigation and Restoration Program
Alexander.Morelan@dtsc.ca.gov

Dave Kereazis
Hazardous Waste Management Program
Associate Environmental Planner
Dave.Kereazis@dtsc.ca.gov

Tamara Purvis
Hazardous Waste Management Program
Associate Environmental Planner
Tamara.Purvis@dtsc.ca.gov