

CALIFORNIA ENVIRONMENTAL QUALITY ACT NOTICE OF EXEMPTION

To: Office of Planning and Research
State Clearinghouse
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: Interim Removal Action Workplan for Lot C-817 E. Franklin Avenue

Project Location: 817 East Franklin Avenue, El Segundo, California

County: Los Angeles

Project Applicant: BCPF Smokey Hollow LLC

Approval Action Under Consideration by DTSC: Removal Action Workplan

Statutory Authority: California Health and Safety Code, Chapter 6.8

Project Description: The project includes excavating and removing the soil in the northern and southwest portion of Lot C to a maximum depth of 7 feet below ground totaling an estimate of 1,637 tons of contaminated soil. The project may also include Implementing a land use covenant (LUC) and an operation and maintenance (O&M) Agreement. EKI Environment & Water, Inc. (EKI) Submitted an Interim Removal Action Workplan dated July 14, 2023, on behalf of BCPF Smokey Hollow, LLC. (Smokey Hollow) to the California Department of Toxic Substances Control (DTSC) to address the elevated concentrations of total petroleum hydrocarbons (TPH); volatile organic compounds (VOCs), mainly benzene, tetrachloroethylene (PCE) and trichloroethylene (TCE); and heavy metal such as arsenic and selenium in the sub surface soil at 817 East Franklin Avenue Lot C (Lot C), in El Segundo.

Lot C, the subject of the IRAW, is located on the northwest corner of Maryland Street and Franklin Avenue and consists of a surface parking lot with no structure on it. Lot C is a subarea of a larger project, referred to as 128 Maryland Street (Site) in DTSC's EnviroStor. The primary sources of subsurface contamination in Lot C include releases from the former drilling sump on the northern portion of Lot C, past fill material, crude oil, and upgradient releases of VOCs, mainly benzene, PCE, and TCE, to soil vapor and groundwater which have primarily impacted soil vapor at the Site. The subsurface soil contaminants at Lot C are at concentrations that pose an unacceptable risk for commercial/industrial land use.

Background: Lot C (817 E. Franklin Avenue) is subarea of a larger project referred to as 128 Maryland Street. The 128 Maryland Street project comprises approximately 5.07 acres and consists of three separate lots that are separated by streets and buildings and are designated as Lot A, Lot B, and Lot C. The 128 Maryland project is not addressed in either the IRAW or this NOE. On June 28, 2022, Smokey Hollow and DTSC entered into a Prospective Purchaser Agreement for DTSC to oversee further investigation and remediation at the Site conducted by Smokey Hollow.

From at least 1923 through 1953, Lot C was vacant land. During this time, the surrounding properties were used for oil production. From 1938 through 1953, a large drilling sump was noted encroaching onto the northern portion of Lot C on aerial photographs. Wyle laboratories historically used these lots for testing aerospace, aeronautical, and electronic components. The testing was mostly conducted on adjacent lots (Lot A and Lot B) to the south and east of Lot C. Past investigation discovered an area of 'crude oil' impacted soil in the northern portion of Lot C. The area was excavated with no confirmation soil samples collected. Based on aerial photo it appears that the excavation was conducted in 2011. Lot C consists of four parcels, contains no structures, and has been used as a parking lot since at least 1963 to the present time.

The remedy proposal in the IRAW for Lot C is based on Phase II activities and remedial investigations conducted at the Site in 2020-2023. Lot C consists of four parcels that cover approximately 0.77 acres and is located adjacent to multi-family residential properties to the north and west with office and retail buildings to the south and east. The Site is zoned for light industrial use by the City of El Segundo and the area includes industrial facilities and commercial properties, including the Chevron Refinery to the south.

Project Activities: The removal action outlined in the IRAW consists of:

- a. Excavating the TPH, VOC, and metal contaminated soil from Lot C, and transporting the excavated soil properly to a permitted off-site disposal facility. Prior to soil excavation, existing paved surfaces would be removed. More soil will be removed as part of the redevelopment into a new parking.

- b. Implementing a LUC and O&M Agreement as needed based on the confirmatory sampling to cover and maintain the ground cover area in the new parking lot.

Subsurface soil and soil vapor sampling performed by Hazard Management Consulting and EKI to the depth of 15 feet below grounds revealed total TPH, VOCs and metals in soil and soil vapor in Lot C at levels exceeding the DTSC risk-based Screening Levels and/or U.S. EPA, Region 9, Regional Screening Levels for industrial/commercial land use. The remedy proposed for Lot C includes excavation in the northern and southwestern half of the Lot C to a maximum depth of seven feet below ground totaling to an estimated volume of 1,090 bank cubic yards or 1,637 tons of soil. A Land Use Covenant will be placed on Lot C to restrict future land use to industrial or commercial land use only, and to prevent unapproved construction activities from disrupting the groundcover and the subsurface soil.

An estimated minimum of 37 truckloads of soil could leave the Site. Depending on the hazard classification, destination, available trucks, loading rate, and traffic conditions, the project is anticipated to have approximately 10 to 20 trucks per day leaving the Site for a minimum of approximately 5 days. Trucking around Lot C will be conducted between the hours of 7:00 a.m. and 5:00 p.m. The Contractor shall comply with all local sound control and voice level rules, regulations and ordinances that apply to any work performed. The City of El Segundo Police and Fire Departments will be notified of the project prior to the initiation of remedial excavation activities.

Materials will be loaded into trucks using an excavator, backhoe, or front-end loader. Loading will occur adjacent to the excavation area or stockpile. To the extent possible, excavated soils will be directly loaded into trucks for off-Site disposal to reduce handling and potential dust emissions. To accomplish direct loading of trucks for soil disposal, soil will be pre-characterized, to the extent possible, and will be designated as acceptable to the selected, permitted disposal facilities prior to the start of soil cleanup activities.

After loading, soil on the exteriors of the trucks will be removed and placed either into the current truck, a designated storage bin of similar material, or the excavation of origin prior to the trucks leaving the work area. The trucks will then proceed to the decontamination pad and be decontaminated in accordance with the Decontamination Plan before exiting the site. Prior to leaving the site, the Contractor will inspect each vehicle to ensure proper loading, overing/sealing, decontamination, placarding (if required), and manifesting has been implemented. Trucks will then be covered with tarps to prevent the release of dust or debris and transported to designated disposal facilities permitted for the waste. The actual loading, turn around, and on-site decontamination pad locations will be determined in the field based on site conditions and staging of excavation activities at the time of the work. In addition, trucks will stop, as required, at any and all state-operated weigh stations in route to their designated off-site disposal facility.

The IRAW includes a Site-Specific Health and Safety Plan, Dust and Vapor Monitoring Plan, a Decontamination Plan, a Transportation Plan, and an Erosion Control Plan, as well as a Perimeter Air Monitoring Plan to monitor and limit any potential generation of dust, odors, and vapor impact to the surrounding areas during the remedy implementation. The Contractor will provide a safe and convenient passage of public traffic in the vicinity of the Site during soil excavation activities. Before initiating the soil excavation, the Contractor will determine the location and type of signage before work begins for the project; determine methods and equipment the Contractor will use for closing lanes and for flagging and controlling one-way traffic, as necessary; ensure flaggers are trained in accordance with the Manual on Uniform Traffic Control Devices (MUTCD) and MUTCD CA Supplement and the Construction Safety Orders. Non-essential and non-certified individuals will not be allowed in the work areas. The work zone boundary will be demarcated with orange cones or other visible delineation, such as fencing traffic control procedures that may be used during vehicle entering and exiting from Lot C including signs and flagmen to ensure safety and to regulate the flow of trucks. The Contractor will close lanes, if necessary, Traffic control will comply with City of El Segundo and Los Angeles County requirements, if any, as well as the current version of the California MUTCD, prepared by the California Department of Transportation.

After the planned soil removal is complete, post excavation confirmation soil sampling will ensure that remedial action objectives have been achieved otherwise more excavation maybe needed. It is anticipated that excavated soil will be stockpiled and characterized prior to off-site disposal. The contractor will characterize the excavated soil to confirm its appropriate disposal designation. RCRA and Non-RCRA hazardous waste will be hauled by U.S. Department of Transportation and U.S. EPA-licensed waste haulers selected by the Contractor. Soil characterized as non-hazardous Class III waste may be disposed of at Antelope Valley Recycling & Disposal Facility, Chiquita Canyon Sanitary Landfill, Lancaster Landfill and Recycling Center, Simi Valley Landfill or Sunshine Canyon City/County Landfill. Any waste characterized as non-RCRA California hazardous waste or RCRA hazardous waste may be disposed of at Clean Harbors-Buttonwillow Landfill, U.S. Ecology-Beatty Landfill or South Yuma County Landfill.

Other waste generated at the Site may include demolition debris such as concrete, asphalt, vegetation, and incidental debris. If applicable, demolition debris such as concrete will be recycled at an off-site recycling facility proposed by the Contractor. Vegetation debris will be minimal and will be disposed of as non-hazardous municipal waste. Other demolition debris will be disposed of at an off-site non-hazardous disposal recycling facility. Trash will be accumulated on-site and will be periodically removed as non-hazardous municipal waste.

Although not anticipated due to the nature of the project, or the depth of excavation, 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 makes an assessment of the area and arrangements are made to protect or preserve any resources that are discovered. Based on the current redevelopment plan, Lot C will continue to be used as parking lot and is currently covered entirely by asphalt, with no exposed soil and does not represent viable ecological habitat. Therefore, ecological receptors are not considered in this IRAW. DTSC's Office of Environmental Equity and Tribal Affairs will address any comments received from any Tribe concerning the area of excavation.

Name of Public Agency Approving Project: Department of Toxic Substances Control

Name of Person or Agency Carrying Out Project: BCPF Smokey Hollow LLC

Exempt Status: Categorical Exemption: Minor Actions Taken to Prevent, Minimize, Stabilize, Mitigate, or Eliminate the Release or Threat of Release of Hazardous Waste or Hazardous Substance Title 14, Sec. 15330

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 is a removal action that will not exceed \$1 million in cost.
3. The project will be consistent with applicable State and local environmental permitting requirements.
4. The project does not involve the onsite use of a hazardous waste incinerator or thermal treatment unit.
5. The project does not involve the relocation of residences or businesses.
6. The project does not involve the potential release into the air of volatile organic compounds as defined in Health and Safety Code Section 25123. (Exception: Small-scale in situ soil vapor extraction and treatment systems which have been permitted by the local Air Pollution Control District or Air Quality Management District.)
7. The exceptions pursuant to Cal. Code Regs., tit. 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 view of a highway officially designated 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 is not expected to cause a substantial adverse change in the significance of a historical resource because none are anticipated; however, outreach to potentially interested Native American tribes is being conducted and every effort will be made to ensure any expressed concerns are addressed.

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 Branch
9211 Oakdale Avenue
Chatsworth, California 91311

Additional project information is available on EnviroStor:

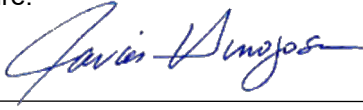
https://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=60003237

Contact Person
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Contact Title
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Phone Number
818-717-6542

Approver's Signature:



Date: 09/13/2023

[Click](#) or tap to enter a date.

Approver's Name
Javier Hinojosa

Approver's Title
Branch Chief

Approver's Phone Number
714-484-5484

TO BE COMPLETED BY OPR ONLY

Date Received for Filing and Posting at OPR: