



February 2, 2023

Ms. Rocio Lopez
City of Corona
400 S. Vicentia Ave
Corona, California 92882

Subject: Clarification of the Upcoming Soil Removal and Soil Management Plan for the Former Clow Facility Located at 1375 Magnolia Avenue Corona California (Site)-rev1.

Dear Ms. Rocio,

This letter has been prepared to provide clarification regarding the upcoming soil removal process and future implementation of a soil management plan (SMP) for grading and development of the Site located at 1375 Magnolia Avenue.

BACKGROUND

The Site was a Clow Valve (Clow) manufacturing facility for many decades and maintained a Conditional Authorization Permit dated September 7, 1993 with the Department of Toxic Substances Control (DTSC) to treat hazardous wastes on Site. Clow has closed the permit and is in the final stages of the "Corrective Action" process required to close the permit. This has included a detailed Site investigation and evaluation and implementation of remedial needs. These Included a Preliminary Endangerment Assessment (PEA) dated March 4, 2004, a Interim Measures Workplan dated April 18, 2005 and multiple rounds of further investigation. The investigation culminated in a Corrective Measures Implementation Report, initially dated October 25, 2021 which was revised and dated April 1, 2022. The document was revised to account for the presence of PCBs as requested by EPA.

As part of approval of the Corrective Measures Implementation Workplan (March 26, 2020), DTSC required the following documents to be prepared:

- Operations and Maintenance Plan, dated June 18, 2021;
- Soil Management Plan dated July 23, 2021; and a
- Land Use Covenant dated November 23, 2021.

Historic operations at the Site resulted in lead contamination in shallow soil at multiple locations throughout the Site; diesel fuel contamination identified beneath a former fuel tank; and impacts by polychlorinated biphenyls (PCBs) present in the soil beneath an electrical transformer.

Based on the initial PEA Report, Clow Valve conducted numerous rounds of investigation and ultimately prepared a Corrective Measures Implementation Workplan (CMIWP), dated March 26, 2020, which was approved by DTSC and implemented between July and October 2021. In addition, Clow Valve excavated all lead-contaminated soil that exceeded the lead hazardous waste criterion of 1,000 milligrams per kilogram (mg/kg) in preparation for the anticipated future Site grading and redevelopment activities proposed by Western Realco. During implementation of the CMIWP, additional areas of soil with PCBs were encountered. DTSC approved the CMIWP's completion on April 14, 2022 with the condition of closure being that a SMP was required to be implemented during future grading at the Site and the area capped with either concrete and asphalt. This capping is proposed to occur as part of Western Realco's (Developer's) proposed redevelopment plan.

Due to the presence of the PCBs found at the Site, which fall out of DTSC's purview and are under the oversight of the U.S. Environmental Protection Agency (USEPA), additional Site assessment activities were conducted through October 2021 under the oversight of the USEPA, as EPA has sole jurisdiction over PCB cleanups. A total of 99 soil samples were collected from a total of 36 soil boring locations. PCB concentrations were detected in 18 boring locations with the majority of these detections in the northern portion of the Site correlating to the presence of foundry sand most likely used as fill. A Risk-Based Approval Modification Application 40 CFR 761.61 (c) (1) dated April 25, 2022 was prepared to document the cleanup requirements for the PCBs which was approved by EPA. This work is currently scheduled for February 2023.

SOIL MANAGEMENT PLAN

In response to the findings of low concentrations of residual lead and hydrocarbons AND the presence of localized areas of PCBs, a SMP dated July 23, 2021 was prepared and was approved by both DTSC and USEPA. The SMP addresses the requirements to handle the

impacted soil allowed to remain on site during future grading including the removal of local hot spots of PCBs to a cleanup level of 15 parts per million. It is acknowledged that residual concentrations of PCBs may remain in the impacted area and it is a requirement of DTSC and EPA that this area shall be capped with at least 6 inches of nonpermeable material such as concrete which at this Site will be the Developer's future building foundation. And as with the DTSC, EPA required that the future grading of Developer's redevelopment project be managed under the guidance of the approved SMP. The soil that is subject to the future capping is not allowed to be relocated out of the area with the required cap so that the PCBs are not spread to other, clean areas of the Site. In essence, the proposed industrial redevelopment plan for the Site proposed by the Developer (including building foundations and concrete parking areas) will become the final "cap" required by the respective agencies.

A Land Use Covenant (LUC) has been prepared and recorded with the County Recorder that limits the Site to commercial and industrial use (no residential, hospitals or schools are allowed) among other requirements of the SMP. The plan for implementation when the Developer's future development occurs includes Clow removing the areas of elevated concentrations of PCBs and then Developer grading the Site under the SMP. The grading will be set up so that the soil in the area of the required cap remains in place and is not moved to outside of the cap.

SPECIFIC QUESTIONS

Based on the documents submitted to date, questions have arisen by the City that require clarification. They are:

- 1. Please provide me with a letter that explains that the Soil Management Plan, the Corrective Measures Implementation Report, and the Operations and Maintenance Plan all prepared for Clow and approved by DTSC addresses the cleanup of the site for the materials you mentioned (hydrocarbons, lead, etc.) and that the reason those reports are not being updated to address the subsequent PCB findings, is because that falls under USEPA and/or state EPA oversight.**

In essence, there are two cleanup efforts at the Site. The first was for DTSC and the second was for EPA. DTSC has been the lead agency for remediation at the Site. However, DTSC is not authorized to oversee cleanup of PCBs as EPA retains sole jurisdiction for PCB Cleanups. The Soil Management Plan, Corrective Measures

Implementation Report and Operations and Maintenance Plan were prepared for and approved by DTSC and cover the metals and hydrocarbons that have been found at the Site. The SMP did include reference to PCBs. The PCB Cleanup Plan (called a "Risk Based Approval") was separately approved by EPA. The Risk Based Approval to address the PCBs found at the Site is contained in a separate plan entitled: Risk-Based Approval Modification Application 40 CFR 761.61 (c) (1) dated April 25, 2022 which was approved by EPA in an undated letter.

2. Provide discussion that a revised LUC will be prepared once the remediation work under DTSC and EPA is completed.

A Land Use Covenant (LUC) was prepared and is recorded on Title for the Site. That LUC was prepared before the recent remedial work was undertaken. DTSC is requiring that that a new LUC be recorded that documents the work conducted after the initial LUC was recorded to provide an updated description of the work conducted and documentation of what residuals are present at the Site after those remedial efforts are complete so that the LUC has such documentation included within the document. The new LUC will be prepared after Developer redevelops the Site and the cap is in place.

3. Please confirm that the proposed demolition of any on-site structures is consistent with the recommendations from the site's tech studies.

The demolition of the on-Site structures for redevelopment is consistent with the recommendation from the Technical Studies completed at the Site. Specifically, the new building will constitute the "CAP" for EPA as required under the Risk Based Approval.

Spiral bound reports are being printed and transmitted to you for your files.

If you have any questions or need additional information, please call me at your convenience.

Very truly yours,
Hazard Management Consulting, Inc.

A handwritten signature in black ink, appearing to read 'Mark S. Cousineau'. The signature is fluid and cursive, with the first name 'Mark' being more prominent than the last name 'Cousineau'.

Mark S. Cousineau, NREP
Principal

