

**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:** Mountain Square Cleaners Removal Action Workplan

**Project Location:** 384 and 386 South Mountain Avenue, Upland, CA 91786

**County:** San Bernardino

**Project Applicant:** Department of Toxic Substances Control

**Approval Action Under Consideration by DTSC:** Removal Action Workplan

**Statutory Authority:** California Health and Safety Code, Chapter 6.8

**Project Description:** The project consists of a Removal Action Workplan (RAW) for the Mountain Square Cleaners site, which entails implementation of a soil vapor extraction system (SVE) with potential sub-slab depressurization (SSD) and a land use covenant (LUC). The extracted soil vapor will be treated with GAC adsorption and discharged through a vapor treatment system to the atmosphere under an appropriate permit from the South Coast Air Quality Management District (SCAQMD). The LUC will prohibit residential, hospital, school or daycare uses, and limit land uses to commercial/industrial.

**Background:** The Site is located within the Mountain Square Center, a shopping center in Upland, California. The Site comprises two tenant spaces (the former and current Mountain Square Cleaners) within the shopping center; the former Mountain Square Cleaners was located at 386 South Mountain Avenue and the current Mountain Square Cleaners is located at 384 South Mountain Avenue. The Site and surrounding tenant spaces in Mountain Square Center were constructed in 1989. The former Mountain Square Cleaners was in operation as a dry-cleaner from approximately 1989 to 1995, and the suite is currently operating as the U.S. Nail Salon and Spa. Mountain Square Cleaners has operated at its current location from approximately 1995 to the present. Tetrachloroethene (PCE) was reportedly used at both locations as part of the dry-cleaning process, but PCE use at the current location was discontinued in 2006 when it became a drop-off-only location.

Since the Mountain Square Center was constructed in 1989, six Phase I environmental site assessments were published between 1993 and 2006, and five subsurface site assessments were conducted between 1999 and 2021. Per the RAW, there are no historical records of any releases at these locations and no evidence of a significant spill was observed during various environmental investigations.

The list of contaminants of concern (COCs) was identified from soil vapor samples collected throughout the Site. Volatile organic compounds (VOCs) such as tetrachloroethylene (PCE), trichloroethene (TCE), and cis-1,2-dichloroethene have been identified in soil vapor beneath the Site above commercial/industrial screening levels. A Human Health Risk Assessment (HHRA) performed at the Site identified on-Site commercial/industrial workers potentially affected by the vapor intrusion pathway as the most significant potential receptor. Other receptors or pathways were not evaluated because they were determined to be insignificant. The results of the HHRA indicated that the potential for vapor intrusion into the Site tenant spaces exists due to PCE concentrations above SLs in soil and sub-slab vapor. However, per the RAW, multiple indoor air testing events have verified that vapor intrusion is not occurring to an extent that PCE concentrations exceed indoor air screening levels.

DTSC and CT Retail Properties Finance II, LLC entered into a Voluntary Cleanup Agreement (Docket Number HSA-FY-16/17-091 signed on April 19, 2017) to address contaminants on the Site.

**Project Activities:** The activities outlined in the RAW to address the COCs at the Site consist of installation and operation of an SVE system to extract soil vapor from the vadose zone.

The SVE and potential SSD system will consist of two dual-completion SVE wells outside the building area with screens extending from approximately 5 to 15 feet below ground surface (bgs) and 20 to 35 feet bgs. Pending access to the interior with a sufficiently sized drill rig, a single-completion SVE well will be attempted to be installed inside the suite at 384 S. Mountain Avenue with a screen extending from approximately 5 to 10 feet bgs. Should SVE prove to be insufficient to maintain subsurface vacuum and there is a need to reduce vapor intrusion, two SSD suction pits will also be installed and connected to the SVE system piping to create a lower pressure directly underneath the building floor relative to the building interior. The SSD suction pits will be installed inside the current and former Mountain Square Cleaners suites 386 and 384, respectively, by coring a 6-inch-diameter hole through the concrete floor slab. Conveyance piping would be installed to the potential SSD suction pit locations at the time of SVE system construction to reduce overall costs if SSD is found to be necessary to reduce the potential for vapor intrusion after one year of testing.

A positive displacement blower will be utilized to extract vapors, and extracted soil vapor from the subsurface would be treated with granular activated carbon (GAC) adsorption and discharged through a vapor treatment system to the atmosphere under an appropriate SCAQMD permit. The SSD/SVE or SVE system may transition to a passive venting system (i.e., no powered vacuum) if VOC concentrations in sub-slab vapor decrease to a concentration that does not depend on active removal to mitigate vapor intrusion. A LUC prohibiting residential, hospital, school, or daycare uses, and limiting land uses to commercial/industrial may or may not be required after completion of the removal action, depending on COPC concentrations observed in the subsurface.

It is assumed that after 3 years, the SVE or SVE/SSD system could be shut down, though it could remain in place as a passive venting system. If COPC concentrations exceed residential SL at the conclusion of SSD/SVE operation, a LUC may be required which would require negotiation with the DTSC and recording with Los Angeles County and annual inspections.

The costs are estimated to be \$500,000 and include costs for initial testing, installation of the SVE system, SVE wells, conveyance piping, and 3 years of operation and maintenance (O&M). Annual O&M costs would be expected to decrease as VOC concentrations in the subsurface decrease because GAC usage would decrease, leading to lower material costs for GAC replacement and SCAQMD permit requirements may change by shifting to a permit exemption.

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

**Name of Person or Agency Carrying Out Project:** CT Retail Properties Finance II, LLC

**Exempt Status:** Categorical Exemption: Class 30 - Minor Actions to Prevent, Minimize, Stabilize, Mitigate or Eliminate the Release or Threat of Release of Hazardous Waste or Hazardous Substances [CCR 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 does not involve the on-Site use of a hazardous waste incinerator or thermal treatment unit or the relocation of residences or businesses and does not involve the potential release into the air of volatile organic compounds (VOCs) as defined in Health and Safety Code Section 25123.

4. The project will be consistent with applicable state and local environmental permitting requirements.
5. The exceptions pursuant to Cal. Code Regs., tit. 14, § 15300.2 have been addressed as follows:
- 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.
  - 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.
  - 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.
  - 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.
  - Historical Resources. The project is not expected to cause a substantial adverse change in the significance of a historical resource because none are anticipated.

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 Program  
9211 Oakdale Avenue  
Chatsworth, CA 91311

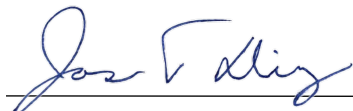
Additional project information is available on EnviroStor:

[https://www.envirostor.dtsc.ca.gov/public/profile\\_report?global\\_id=60002484](https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=60002484)

Contact Person	Contact Title	Phone Number
Bahareh Ertezaei	Project Manager	818-938-8574

Approver's Signature:

Date: 9/4/2024



Approver's Name  
Jose Diaz

Approver's Title  
Unit Chief

Click or tap to enter a date.

Approver's Phone Number  
818-717-6614

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TO BE COMPLETED BY OPR ONLY

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Date Received for Filing and Posting at OPR: