

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 and Restoration Program
9211 Oakdale Avenue
Chatsworth, CA 91311

Project Title: Removal Action Workplan for Lots A, B, and C -128 Maryland Street

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 limited excavation of soil and utilization of existing and future pavement and structures as a protective cover to block exposure pathways for building occupants at Lot B, continuation or expansion of the current 12 month Soil Vapor Extraction (SVE) pilot test, and implementation of a Land Use Covenant (LUC). EKI Environment & Water, Inc. (EKI) Submitted a Removal Action Workplan dated July 31, 2024, 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 tetrachloroethylene (PCE) and trichloroethylene (TCE); and heavy metals in the sub surface soil at Lot B. The primary sources of subsurface contamination are believed to be mercury releases to soil on the northwestern portion on Lot B and potential on-site releases of VOCs to soil vapor and groundwater. PCE and TCE in soil vapor represent the primary health risk to the Site for commercial/industrial workers. Shallow soils within the northwestern portion of Lot B contain elevated mercury, arsenic, and cobalt which represent the primary health risks for redevelopment and maintenance workers at Lot B.

Background: 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. The remedy proposal in the RAW is based on Phase II activities and remedial investigations conducted at the Site between 2020- 2024. 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. Lot A is located on the northwest corner of El Segundo Boulevard and Maryland Street and consists of three commercial buildings and a parking lot. Lot B is located east of Maryland Street and west of Center Street and consists of commercial buildings. Lot C is located on the northwest corner of Maryland Street and Franklin Avenue and consists of a parking lot. The Site is zoned for light industrial use by the City of El Segundo and is surrounded by industrial facilities and commercial properties in all directions, including the Chevron Refinery to the south. The northern portion of the building on Lot A is utilized for aerospace testing and the southern portion of the building is vacant. Lot B is currently vacant but previously used for various commercial/industrial purposes. Lot C was used as a parking lot from at least 1963 to the present time. From 1950-2015, Wyle laboratories historically used these lots for testing aerospace, aeronautical, and electronic components.

Environmental testing was mostly conducted on Lot A and Lot B. Impacted soils were excavated in Lot C in October 2023 pursuant to an Interim Removal Action Workplan (IRAW 2023). Soil was excavated up to 7 feet deep to reduce the contamination to acceptable levels for a commercial/industrial land use scenario. Lot C is currently being developed into an open-air four-story parking lot. In April 2024, the SVE pilot test commenced in accordance with the DTSC approved SVE Pilot Test Work Plan for Lots A, B, and C (EKI, 2023).

Smokey Hollow is redeveloping the property. Lots A and B will be redeveloped for commercial use. A new building (Building B-1) is planned for Lot B (mass grading of the northern portion of Lot B, where Building B-1 will be located, will not be necessary for the construction of the building). Lot C is being redeveloped as an above ground open 4-level parking structure with a total of 274 stalls. The City of El Segundo has determined that the redevelopment project is a ministerial action that is exempt from CEQA.

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

- a. Limited excavation of approximately 750 tons of potentially contaminated soils as needed for construction and the utilization of existing and future pavement and structures as a protective cover to block exposure pathways for building occupants at Lot B. Contaminated soil will be transported properly to a permitted off-site disposal facility

- b. Completion of the 12-month SVE pilot test with potential expansion or continued SVE operation to mitigate vapor intrusion in the existing buildings on the Site. Although SVE is anticipated to be sufficient to mitigate vapor intrusion in the existing buildings, if the SVE system is determined to be insufficient following completion of SVE, vapor intrusion mitigation system (VIMS) will be installed for any building in which vapor intrusion issues are present.
- c. Implementing a LUC and O&M Agreement as needed based on the confirmatory sampling to cover and maintain the ground cover area at the Site

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 at the Site detected 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 the Site includes limited excavation of four mercury hot spots within Lot B with mercury concentrations about the mercury TTLC criterion of 20 mg/kg. Sampling locations with the highest mercury concentrations in soil within Lot B will be removed before redevelopment excavation activities are conducted at Lot B as a mitigation measure to protect human health and the environment. The initial extent of the mercury hot spots will be 5 feet by 5 feet by 5 feet, which may be extended based on confirmation sampling results for mercury, in consultation with DTSC. A Land Use Covenant will be placed 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.

The Raw includes a Site-Specific Health and Safety Plan, Dust and Vapor Monitoring Plan as well as a Perimeter Air Monitoring Plan to monitor any potential impact to the surrounding areas during the remedy implementation. Based on the current redevelopment plan, Lot A and B will continue to be used as commercial industrial businesses and Lot C will continue to be used as a parking lot, with no exposed soil and does not represent viable ecological habitat. Therefore, ecological receptors are not considered in this RAW.

Soil excavations related to grading, utility trenching, and drilling of piles for the construction of a new building on the northern portion of Lot B will result in at least 750 tons of soil for off-site disposal. After the planned soil removal is complete, 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 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.

An estimated minimum of 38 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 4 days. Trucking around the Site will be conducted between the hours of 7:00 a.m. and 5:00 p.m. The City of El Segundo Police and Fire Departments will be notified of the project prior to the initiation of remedial excavation activities. To the extent possible, excavated soils will be directly loaded into trucks for off-Site disposal to reduce handling and potential dust emissions. Trucks will then be covered and transported to designated disposal facilities permitted for the waste. 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. The Contractor shall comply with all local sound control and voice level rules, regulations and ordinances which apply to any work performed.

The Contractor will be required to 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 a flag person. As appropriate, the flag person will slow or stop traffic on Maryland as trucks enter or exit the Site. The Contractor will close lanes, if necessary, in a manner that conforms to California Department of Transportation and the City of El Segundo requirements.

The degree of traffic control along the streets surrounding the Site will depend on conditions encountered at the time of material hauling. If traffic along the streets presents a problem as determined by the Contractor or EKI, flagmen will be used to ensure safety and to regulate the flow of trucks. 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. Materials will be loaded into trucks using an excavator, backhoe, or front-end loader. Loading will occur adjacent to the excavation area or stockpile. 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, covering/sealing, decontamination, placarding (if required), and manifesting has been implemented. Prior to departure, trucks will be covered with tarps to prevent the release of dust or debris. 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 Dust and Vapor Control Plan specifies measures to be undertaken to limit generation of dust, odors, and vapors, measures to be taken if dust is present on adjacent on- and off-Site public streets, and measures to control such emissions following identification of problems as defined by airborne Action Levels specified in the AMP. To monitor the effectiveness of the Contractor's dust control practices, perimeter air monitoring will be conducted.

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. DTSC has submitted a Tribal Cultural Resource Request for Outreach to the DTSC Office of Environmental Equity and Tribal Affairs to address any comments received with 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 cleanup action to be taken to prevent, minimize, stabilize, mitigate, or eliminate the release or threat of release of a hazardous waste and substance.
2. The project is a removal action costing \$1 million or less.
3. The project will not be located on a site which is included on any list compiled pursuant to Cal. Gov. Code § 65962.5 (<http://calepa.ca.gov/sitecleanup/corteselist/default.htm>)
4. The project will not have a significant effect on the environment due to unusual circumstances.
5. The project will not result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway.
6. The project will not cause a substantial adverse change in the significance of a historical resource.
7. The project will not require onsite use of a hazardous waste incinerator or thermal treatment unit.
8. The project will not require the relocation of residences or businesses.
9. All necessary permits for removal activities, transportation, and air quality will be obtained prior to remediation. The anticipated permits may include, but are not necessarily limited to, the following:
 - a. OSHA excavation permit
 - b. City of El Segundo, encroachment permit
 - c. SCAQMD Rule 1166 (Volatile Organic Compound Emissions from Decontamination of Soil) permit
 - d. fugitive dust emission control plan.
 - e. SCAQMD Rule 1466 (Control of Particulate Emissions from Soils with Toxic Air Contaminants) permit
10. The RAW includes the following monitoring/control plans:
 - a. A Decontamination Plan.
 - b. A Dust and Vapor Control Plan

- c. A Perimeter Air Monitoring Plan
 - d. A Transportation Plan
 - e. An Erosion Control Plan
11. The cumulative impact of successive projects of the same type on the same place, over time, if there are any, will not be significant.
12. The project will be consistent with applicable State and local environmental permitting requirements.

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:

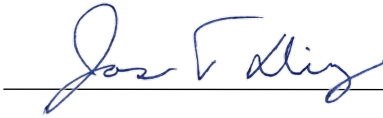
https://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=60003237

Contact Person
Melissa Marin

Contact Title
Environmental Scientist

Phone Number
818-717-6565

Approver's Signature:



Date:

2/5/2025
Click or tap to enter a date.

Approver's Name
Jose Diaz

Approver's Title
Acting Branch Chief

Approver's Phone Number
818-717-6614

TO BE COMPLETED BY OPR ONLY

Date Received for Filing and Posting at OPR: