

**ADDENDUM TO THE INITIAL STUDY/MITIGATED NEGATIVE DECLARATION FOR THE  
CHEMOURS OAKLEY SITE SEDIMENT, SOIL AND GROUNDWATER CORRECTIVE MEASURE  
STUDIES  
OAKLEY, CALIFORNIA  
MARCH 2022  
State Clearinghouse Number 2018032039**

**I. INTRODUCTION**

This Addendum was prepared in accordance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines. This document has been prepared to serve as an Addendum to the previously approved Initial Study/Mitigated Negative Declaration (IS/MND) for the Chemours Oakley Site Sediment, Soil, and Groundwater Corrective Measure Studies (Chemours CMS Project). The California Department of Toxic Substances Control (DTSC), as the Lead CEQA Agency, approved the IS/MND on June 29, 2018. The IS/MND evaluated the environmental effects associated with the Chemours CMS Project which involved remediating sediment and soil by dredging of contaminated sediment, excavation of contaminated soil, ex-situ soil aeration, ex-situ soil stabilization, removal of subsurface features, offsite disposal of excavated material, backfilling excavations with on-site clean soil, and installing warning signs and implementing institutional controls to protect human health. The remedy for groundwater included in-situ groundwater treatment, additional soil excavation, phytoremediation, and monitoring. Work was conducted over the course of 2 field seasons (i.e., Year 1 and Year 2).

Project Background

The Project Site is located on the property at 6000 Bridgehead Road in Oakley, California, where hazardous waste was previously managed E.I. du Pont de Nemours (DuPont). In 2003, DuPont's successor, The Chemours Company FS, LLC (Chemours), and DTSC entered into a Corrective Action Consent Agreement for the Facility, and the final remedy has since been completed and monitoring is ongoing.

This Addendum has been prepared pursuant to CEQA Guidelines and addresses new remediation work proposed on the same property as the previously approved Chemours CMS Project; this Addendum assesses potential impacts from the NP Oakley Facility (Project Site) Corrective Measures Proposal (CMP) For Building 5 Area Cleanup in the southeast portion of the property which were not included or analyzed in the Chemours CMS Project IS/MND.

Proposed Modification

Subsequent to the 2018 Chemours CMS Project approval, the Chemours Oakley facility was purchased by NP Oakley, LLC from Chemours in September 2019 with plans to incrementally build multiple industrial warehouse buildings as part of the Contra Costa Logistics Center (CCLC). During construction of Building 4 of the CCLC, NP Oakley, LLC was permitted by the Central Valley Regional Water Quality Control Board (CVRWQCB) to discharge treated groundwater from temporary construction dewatering to an infiltration area largely coincident with a portion of the future Building 5 footprint.

However, NP Oakley, LLC was issued a Notice of Violation by the CVRWQCB on September 8, 2021, for failure to conduct monitoring and submit reports and the Project Site was subject to an overland release to the approved infiltration area (largely within the footprint of future Building 5) of partially treated contaminated water (see map below).



An investigation was conducted at the Project Site to evaluate the potential soil, soil vapor and groundwater impacts from the contamination of the infiltration area. The Project Site was investigated for volatile organic compounds (VOC), metals, fluoride, and organolead. Elevated concentrations of VOCs were detected in soil vapor and groundwater, and arsenic exceeded the site-specific background concentration in two samples. Investigation findings were summarized in the Building 5 Pre-Construction Supplemental Investigation Report (Roux Associates, Inc., December 16, 2021).

Based on investigation findings, the CMP includes the installation of three groundwater monitoring wells, groundwater monitoring, and institutional controls, including a Land Use Covenant (LUC) that will restrict the site to commercial/industrial land use and require the implementation of a groundwater management plan.

The CMP also includes the prior time-critical Interim Measures Workplan excavation of approximately 30,000 cubic yards and offsite disposal activities of volatile organic carbon (VOC)-impacted soil. The implementation of the Interim Measures Workplan was required to prevent the spread of contamination and reduce the cumulative risks to human health and the environment. The Interim Measures Workplan was approved on January 13, 2022. The targeted soil removal was completed from January 18 through February 17, 2022.

Pursuant to CEQA Guidelines [Cal. Code Regs., tit. 14, §15164(c)], this Addendum is not being circulated for public review. A Notice of Determination will be filed with the State of California Office of Planning and Research, State Clearinghouse, upon project approval.

## II. PURPOSE OF ADDENDUM AND CEQA REQUIREMENTS

The purpose of this Addendum is to address the environmental effects of the activities described in the NP Oakley Facility CMP to determine whether any significant environmental impacts that were not identified in the IS/MND would result in significant impact or, whether previously identified significant impacts would be substantially more severe. This document has been prepared in accordance with the CEQA Guidelines, [Cal.

Code Regs., Title 14, §15164 and §15162] and addresses the proposed NP Oakley Facility CMP related activities relative to the Chemours CMS.

### **III. BASIS FOR DECISION TO PREPARE AN ADDENDUM**

The California Environmental Quality Act (CEQA) requires that the proposed project be reviewed to determine the environmental effects that would result if the project is approved and implemented. California Public Resources Code Section 21166 and CEQA Guidelines Sections 15162 and 15164 set forth the criteria for determining whether a subsequent Environmental Impact Report (EIR), subsequent negative declaration, addendum, or no further documentation be prepared in support of further agency action on the project. Pursuant to CEQA Guidelines Section 15162, a subsequent EIR or negative declaration shall be prepared if any of the following criteria are met:

- (a) When an EIR has been certified or negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:
  - (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
  - (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
  - (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
    - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
    - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
    - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
    - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.
- (b) If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall prepare a subsequent EIR if required under subdivision (a). Otherwise, the lead agency shall determine whether to prepare a subsequent negative declaration, and addendum, or no further documentation.

In determining whether an Addendum is the appropriate document to analyze the proposed modifications to the project and its approval, CEQA Guidelines Section 15164 (Addendum to an EIR or Negative Declaration) states:

- a) The lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.
- b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.

- c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.
- d) The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.
- e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's required findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

As demonstrated in the environmental analysis provided in Section V, Environmental Impact Analysis, the NP Oakley Facility CMP does not meet the criteria for preparing a subsequent EIR or negative declaration as established under CEQA Guidelines Section 15162.

#### **IV. APPLICATION OF PREVIOUSLY CERTIFIED ENVIRONMENTAL DOCUMENTATION TO CORRECTIVE MEASURES PROPOSAL**

The IS/MND evaluated the potential impacts associated with proposed remediation activities described in the Chemours CMS reports. The following similar additional activities subject to CEQA are proposed in the CMP to address soil vapor and groundwater contamination at the Project Site in 2022:

- Time-critical removal of soils impacted by the Building 5 Area Release (already completed).
- Groundwater wells (3) will be installed upgradient and downgradient of Building 5, and monitored quarterly for the first year, then as required by a future Operation and Maintenance [O&M] Plan to ensure the contamination is not migrating.
- Institutional controls will be implemented via a Land Use Covenant to ensure protectiveness and integrity of the remedy.
- A vapor intrusion mitigation system (VIMS) will be constructed for Building 5 to protect future occupants.
- Preparation of an Operation and Maintenance (O&M) Plan for the Site.

#### **V. ENVIRONMENTAL IMPACT ANALYSIS**

This section of the Addendum provides analysis and cites substantial evidence that supports the conclusion that the actions being implemented under the NP Oakley Facility CMP do not meet the criteria requiring preparation of a subsequent IS/MND. As required under CEQA Guidelines Section 15164(d), "... the decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project." A brief explanation of the decision to not prepare a subsequent document shall be supported by substantial evidence.

The Project Site (NP Oakley Facility) occupies the same property footprint as the Chemours Oakley Facility subject to the Chemours CMS and IS/MND approved on June 29, 2018. The NP Oakley Facility remediation activities will not occur in or near the wetland areas. Because the Project Site occupies the same property footprint and consists of similar remediation activities, all potential environmental impacts related to the physical conditions of the Project Site would be similar to those previous identified in the adopted IS/MND.

The proposed CMP does not require any action that changes the circumstance of the previous Chemours project approvals. No substantially altered use would be developed on-site; after remediation the site will be developed as planned and approved, as part of the CCLC. The surrounding environment is largely unchanged from that identified in previous documents, except for continued progress on development of the CCLC. No new or existing adjacent use would be impacted by the CMP. The location, size, and nature of proposed on-site uses (e.g., CCLC development) are unchanged from that previously addressed in the approved IS/MND or this Addendum. Due to this similarity in uses, it is reasonable to conclude that the severity of identified impacts related to specific land uses would not exceed that previously identified in either the adopted IS/MND or this Addendum.

The mitigation measures identified in the adopted IS/MND for the Chemours CMS Project are not applicable to the NP Oakley CMP. Because the work being conducted under the CMP is limited to the CCLC and does not include any wetland or undisturbed areas that serve as habitat for threatened and endangered species or migratory birds where some of the Chemours remediation occurred, biological resources are not at risk. In addition, no cultural resources are anticipated due to the extent of previous site disturbances. Compliance with appropriate project mitigation as well as applicable City, state and federal conditions, guidelines and regulations would apply; thereby reasonably assuring the CMP project activities are implemented in a safe and effective manner. In the absence of any new impact or the increase in severity of a previously identified impact, no new mitigation is warranted.

Implementing the CMP activities at the Project Site would not alter the analysis or findings detailed in the IS/MND for the following impact issue areas: Aesthetics, Agricultural Resources, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, Recreation, and Utilities and Service Systems. The CMP occupies the same property identified in the adopted IS/MND and consists solely of similar remediation activities within the CCLC development area. The CMP activities do not expand work outside of the Facility or into sensitive habitats or areas not planned for future development as part of the CCLC, include more intensive activity, nor require the installation of structures or facilities that would alter the less than significant findings detailed in the approved IS/MND. Therefore, the Project would not create new impacts or increase the severity of a previously identified environmental impact.

The CMP remediation activities would also have no new environmental impacts associated with remaining resource areas: Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Greenhouse Gases, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise, Transportation and Traffic, and Tribal Cultural Resources. The impacts associated with the CMP for these issue areas would be within the scope of impacts identified in the approved IS/MND, as described below.

## **AESTHETICS**

IS/MND. Remediation activities did not alter the visual character of the property, so there was no impact on aesthetics.

CMP. The Project would not create new impacts or increase the severity of a previously identified environmental impact identified in the approved IS/MND.

## **AGRICULTURAL RESOURCES**

IS/MND. Remediation had no impacts because the property has no current or planned future agricultural or forest uses.

CMP. The Project would not create new impacts or increase the severity of a previously identified environmental impact identified in the approved IS/MND.

## **AIR QUALITY**

IS/MND. Remediation activities were subject to construction dust mitigation measures implemented in accordance with requirements of the Bay Area Air Quality Management District (BAAQMD). The project would not conflict with or obstruct implementation of the applicable air quality plan. Potential diesel fumes from construction equipment would not impact residents due to their distance from the Site. Therefore, impacts would be less than significant.

CMP. Remediation activities will mainly be short term, with minimal long-term impacts from workers occasionally traveling to the site to conduct routine monitoring. Protocols for mitigation of potential fugitive dust emissions from heavy equipment have been incorporated into the CMP. Dust control measures include, but are not necessarily limited to, watering exposed surfaces (e.g., staging areas, soil piles, graded areas, and unpaved access roads), ensuring trucks transporting soil off-site are covered; removing visible mud or dirt

track-out onto adjacent public roads using wet power vacuum street sweepers; limiting vehicle speeds on unpaved roads to 15 miles per hour (mph); limiting vehicle idling times; and monitoring wind speed to ensure dust control activities are sufficient, or stopping work if dust cannot be properly controlled.

Based on the CMP activities being substantially similar to the work conducted under the approved IS/MND and the work being limited to the Project Site, no impact of greater severity would result from implementation of the CMP. Like the project addressed in the adopted IS/MND, impacts would remain less than significant.

## **BIOLOGICAL RESOURCES**

IS/MND. The Chemours CMS included dredging sediment, working in wetlands, and working in areas that may be occupied by special status species and migratory birds. Because special status species had potential to occur at the Site in remediation areas, several mitigation measures were implemented for avoidance and minimization of impacts on biological resources. Most significantly, the bulk of the remediation work was planned to occur between September 15 and March 1, outside of the nesting season for birds, to reduce the potential for any impacts on special status and migratory bird species. Chemours CMS biological resources impacts were considered less than significant with mitigation incorporated. No considerable contribution to cumulative impacts related to biological resources was anticipated.

CMP. Activities proposed in the CMP will have a lesser impact on biological resources than the Chemours CMS due to the location of the proposed remediation work; the area is in the southern portion of the property adjacent to the railroad and within the planned development footprint of the CLLC, and is not near wetland areas, habitat for special status species, or trees where migratory birds may roost or nest. CMP activities will have a lesser impact than those specified in the IS/MND and do not require the same type of mitigation measures based on the lack of habitat for the species of special concern and migratory birds that may have occurred in the areas of the Site impacted by the Chemours CMS. Therefore, based on the location and scope of CMP activities, impacts will be less than significant.

## **CULTURAL RESOURCES**

IS/MND. The presence of cultural resources was considered unlikely in the previously disturbed areas where soil and debris would be excavated under the Chemours CMS. No historical or cultural resources were identified at the Site or within a half-mile radius of the boundary in a 2004 survey. However, any unexpected discoveries (i.e., archaeological artifacts, paleontological deposits, or human remains) during work would have resulted in a stoppage of work to evaluate the discovery and consult with appropriate agencies.

CMP. CMP activities will occur in a previously disturbed area where no cultural resources are expected to be encountered. However, as under the Chemours CMS, work will be stopped in the event of an unexpected discovery. Because excavation is being conducted mainly within a disturbed area, the excavation required for the CMP will not create any additional impacts beyond what was presented in the MND.

## **GEOLOGY AND SOILS**

IS/MND. The previous remediation efforts included dredging of sediment, excavation of soil, backfilling, and installing dozens of monitoring wells. Work occurred over the course of two field seasons (Year 1 and Year 2). Some excavation locations extended into saturated groundwater and required dewatering; chemical amendments were also added to some excavated areas. No considerable contribution to cumulative impacts related to geology and soils was anticipated based on the planned activities.

CMP. Intrusive activities proposed in the CMP are limited to installing three groundwater monitoring wells in an area where wells have previously been installed and development of the CCLC is to be completed. CMP activities will be no more significant than those conducted under the IS/MND, and potential impacts would be less than significant.

## **GREENHOUSE GASES (GHGs)**

IS/MND. The Chemours CMS environmental analysis concluded the Project activities would not generate GHG emissions that would have a significant impact on the environment or conflict with any applicable plans, policies, or regulations, including GHG reduction actions/strategies of the BAAQMD. Thus, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHGs, and impacts would be less than significant.

CMP. Activities proposed in the CMP would also not result in GHG emissions substantially different beyond those identified in the MND. GHG emissions from construction equipment will be temporary and limited. Therefore, potential impacts are considered less than significant.

## **HAZARDS AND HAZARDOUS MATERIALS**

IS/MND. All generated waste would be handled, treated (as necessary), and transported in accordance with federal, state, and local statutes and regulations. All generated waste would be treated (as necessary) and disposed of at licensed facilities permitted to accept the material as profiled in accordance with federal, state, and local statutes and regulations. Therefore, impacts associated with the Chemours CMS were characterized as less than significant.

CMP. The installation of groundwater monitoring wells is being conducted to protect human health and the environment. The remediation activities would be conducted by persons specifically trained for this manner of operation and would be conducted in accordance with the requirements established in the project-specific health and safety plan; therefore, no greater exposures to hazardous materials would result occur. Like the finding detailed in the approved IS/MND, impacts related to this issue would be less than significant. No increased severity of exposure would result from implementation of the CMP. The information presented in the CMP would not alter the impact findings for Hazardous and Hazardous Materials section of the IS/MND.

## **HYDROLOGY AND WATER QUALITY**

IS/MND. The Chemours CMS Project would improve groundwater and surface water quality within and downgradient of the project area over time. The IS/MND concluded the project activities would not violate water quality standards or waste discharge requirements during the temporary remedy implementation activities because project controls that eliminate or reduce potential water quality impacts were incorporated into the Project.

CMP. Best practices for containment of contaminated materials will be implemented during drilling and groundwater monitoring at the Project Site, protecting offsite areas and local storm water drains. Potential impacts are considered less than significant.

## **LAND USE AND PLANNING**

IS/MND. Remediation would have no impacts because the Chemours CMS Project area did not divide an established community, nor did it conflict with any applicable land use plan, policy, or regulation, nor any applicable habitat conservation plan or natural community conservation plan.

CMP. The Project would not create new impacts or increase the severity of a previously identified environmental impact identified in the approved IS/MND.

## **MINERAL RESOURCES**

IS/MND. Remediation had no impacts because no mineral resources were identified on the property and there was no excavation deeper than 15 feet below ground surface.

CMP. The Project would not create new impacts or increase the severity of a previously identified

environmental impact identified in the approved IS/MND.

## **NOISE**

IS/MND. The IS/MND concluded Project compliance with all noise requirements during construction and operation would not generate a substantial temporary or permanent increase in ambient noise levels. No considerable contribution to cumulative impacts related to noise was anticipated.

CMP. The CMP activities generating noise will be of limited duration and extent and will not occur within or adjacent to a residential development. Sources of noise will be the same as those identified in the IS/MND (heavy equipment). Worker exposure to noise will be controlled using engineering controls and personal protective equipment implemented in accordance with project-specific health and safety plans to ensure compliance with OSHA standards. Impacts associated with the project activities are considered less than significant.

## **POPULATION AND HOUSING**

IS/MND. Remediation activities would not impact population and housing.

CMP. The Project would not create new impacts or increase the severity of a previously identified environmental impact identified in the approved IS/MND.

## **PUBLIC SERVICES**

IS/MND. Remediation activities will not result in a change in the need for, or availability of, public services.

CMP. The Project would not create new impacts or increase the severity of a previously identified environmental impact identified in the approved IS/MND.

## **RECREATION**

IS/MND. Remediation activities would have no impact, as the remediation areas do not include recreational facilities, nor would project activities impact recreational areas, increase the demand for recreational facilities, or otherwise affect recreational facilities.

CMP. The Project would not create new impacts or increase the severity of a previously identified environmental impact identified in the approved IS/MND.

## **TRANSPORTATION AND TRAFFIC**

IS/MND. No considerable contribution to cumulative impacts related to transportation and traffic were identified given the limited number of vehicles and personnel necessary to implement Site remediation activities compared to the capacity of existing highways and local roads. The Site is served by major thoroughfares, including State Highway 160.

CMP. Potential short-term traffic impacts would be limited in duration and severity, with heavy equipment required only to install and repair or decommission the groundwater wells as needed. Potential impact is considered less than significant.

## **TRIBAL CULTURAL RESOURCES**

IS/MND. Although no Native American tribal cultural resources are known to occur within the Project Site, based on site- and Project-specific information, project controls will be implemented if tribal cultural resources are encountered during project activities.

CMP. CMP activities will comply with the project controls identified in the MND, as applicable. Because remediation is being conducted mainly within a disturbed area, the CMP will create no additional impacts beyond what was presented in the IS/MND.

## **UTILITIES AND SERVICE SYSTEMS/ENERGY**

IS/MND. Remediation activities would have no impact as they would not result in a change in the need for, or availability of, utilities and service systems. Energy impacts were not analyzed in the approved IS/MND because they were not on the State CEQA Guidelines Appendix G checklist until January 1, 2019, which was subsequent to the approval of the CMS.

CMP. The Project would not create new impacts or increase the severity of a previously identified environmental impact identified in the approved IS/MND. The installation and operation of groundwater wells would require typical energy resources associated with a commercial/industrial development.

## **WILDFIRE**

Wildfire impacts were not analyzed in the approved IS/MND because they were not on the State CEQA Guidelines Appendix G checklist until January 1, 2019, which was subsequent to the approval of the CMS. According to the CAL FIRE Hazard Severity Zone Map Local Responsible Area (LRA) (Recommended 1/2009) for Contra Costa County the Project Site is located within a Non-Very High Fire Hazard Severity Zone.

## **ENVIRONMENTAL FINDING**

The 2018 approved IS/MND for the Chemours CMS was supported by detailed environmental analyses. The IS/MND underwent required public review. All public review comments were addressed prior to the approval of the project and approval of the IS/MND on June 29, 2018. The mitigation measures identified in the approved IS/MND for the Chemours CMS Project are not applicable to the NP Oakley CMP due to the location of the new proposed remediation activities. Compliance with appropriate project mitigation as well as applicable City, state and federal conditions, guidelines and regulations would apply; thereby reasonably assuring the CMP project activities are implemented in a safe and effective manner.

The planned remediation activities of the CMP will not cause a new significant impact or substantially increase the severity of a previously identified impact of the Chemours CMS. No new plans, policies, or regulations that would result in new significant environmental impacts or an increase in the severity of environmental impacts were identified. There have been no significant changes in circumstances that would involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects. None of the “new information” conditions listed in CEQA Guidelines Section 15162[a][3] are present here to trigger the need for a subsequent EIR or negative declaration.

CEQA Guidelines Section 15164 states that “the lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.” An addendum is appropriate for the CMP as the remediation activities at the Project Site are substantially similar to the Chemours CMS already assessed in the adopted IS/MND, is of limited scale and duration, and would not result in a new significant impact or increase the severity of a previously identified impact. As such, implementation of the CMP does not entail project changes warranting the preparation of a subsequent EIR or negative declaration.

Activities proposed in the CMP would not alter the impact findings for Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Greenhouse Gases, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise, Transportation and Traffic, and Tribal Cultural Resources criteria presented in the IS/MND. With implementation of this Addendum, there would be no new significant impacts and no substantial increase in the severity of impacts regarding these issues compared to the issues identified in the IS/MND. No additional mitigation measures are required for the CMP. Therefore, the impacts for the CMP are within the scope of impacts identified in the IS/MND, and the IS/MND adequately addressed all impacts of the CMP.

Based on the above, an Addendum is the appropriate CEQA document for the CMP activities pursuant to the CEQA Guidelines [Cal. Code Regs., tit. 14, § 15164(b)] because none of the conditions described in the CEQA Guidelines [Cal. Code Regs., tit. 14, §15162] apply. This Addendum has appropriately disclosed the potential impacts from the CMP activities and will be included as part of the CEQA record for the CMP. A Notice of Determination for this Addendum to the IS/ MND will be filed with the California State Clearinghouse within the State of California Office of Planning and Research.

**CERTIFICATION**

DTSC hereby certifies that the statements furnished above present the data and information required for this evaluation and that the facts, statements, and information presented are true and correct.

*Ed Walker*

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5/25/2022

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Date