



Jared Blumenfeld  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

Meredith Williams, Ph.D.  
Acting Director  
5796 Corporate Avenue  
Cypress, California 90630



Gavin Newsom  
Governor

March 11, 2019

Governor's Office of Planning & Research

MAR 12 2019

STATE CLEARINGHOUSE

Mr. David Black  
Planner IV  
Imperial County Planning and Development Services Department  
801 Main Street  
El Centro, California 92243  
[davidblack@co.imperial.ca.us](mailto:davidblack@co.imperial.ca.us)

**DRAFT INITIAL STUDY FOR ALL AMERICAN GRAIN COMPANY, LLC., 305 YOCUM ROAD/204 ALBRIGHT AVE CALIPATRIA, CALIFORNIA (SCH#2019029112)**

Dear Mr. Black:

The Department of Toxic Substances Control (DTSC) reviewed the draft Initial Study (City of Imperial, February 14, 2019) for All American Grain Company, LLC., located at 204 Albright Avenue, Calipatria (Assessor's Parcel Number 024-260-032-000).

The project proposes to amend the use of the parcel from agricultural to industrial use to allow establishment of a Container Yard and Rail Spur.

DTSC is providing the following comments related to the Initial Study, Section VIII, Hazards and Hazardous Materials:

1. Subsections "a" - This subsection should further discuss the historical use of the site as an agricultural land and discuss the potential application of organochlorine pesticides (OCPs) at the Site. OCPs were extensively used in agriculture, mosquitos controls and are persistent in the environment. Transport and disposal of potential OCP-impacted soil should be discussed in this subsection.
2. Subsection "d" - Although the site is not listed in the hazardous waste or substance list in the DTSC's EnviroStor database. The former use of Site as an agricultural land is a recognized environmental condition (REC). Prior to any construction, soil investigation should be conducted if OCPs were used in the past. DTSC recommends soil investigation in accordance with the DTSC's

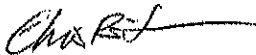
Mr. David Black  
March 11, 2019  
Page 2

Interim Guidance for Sampling Agricultural Properties (Third Revision)  
(<https://www.dtsc.ca.gov/schools/upload/Ag-Guidance-Rev-3-August-7-2008-2.pdf>). All environmental investigations, sampling and/or remediation for the site should be conducted under a Workplan approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous substance cleanup.

DTSC appreciates the opportunity to review the Initial Study. Should you need any assistance in environmental investigation, please submit a request for Lead Agency Oversight Application which can be found at <https://www.dtsc.ca.gov/SiteCleanup/Brownfields/voluntary-agreements-guide.cfm>.

Should you have any questions regarding this letter, please contact me at (714) 484-5392 or by email at [ChiaRin.Yen@dtsc.ca.gov](mailto:ChiaRin.Yen@dtsc.ca.gov).

Sincerely,



Chia Rin Yen  
Environmental Scientist  
Brownfields Restoration and School Evaluation Branch  
Site Mitigation and Restoration Program

ar/cy/yg

cc: Governor's Office of Planning and Research (via e-mail)  
State Clearinghouse  
P.O. Box 3044  
Sacramento, California 95812-3044  
[State.clearinghouse@opr.ca.gov](mailto:State.clearinghouse@opr.ca.gov)

Mr. Dave Kereazis (via e-mail)  
Office of Planning & Environmental Analysis  
Department of Toxic Substances Control  
[Dave.Kereazis@dtsc.ca.gov](mailto:Dave.Kereazis@dtsc.ca.gov)

Ms. Yolanda M. Garza (via e-mail)  
Brownfields Restoration and School Evaluation Branch  
Site Mitigation and Restoration Program  
[Yolanda.Garza@dtsc.ca.gov](mailto:Yolanda.Garza@dtsc.ca.gov)