

CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION

2019048323

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
700 Heinz Avenue
Berkeley, CA 94710

Project Title: Palo Alto Town & Country Village Removal Action Workplan (RAW)

Project Location: 855 El Camino Real, Palo Alto 94301

County: Santa Clara

Project Description:

The purpose of the project is to remediate soil vapor containing concentrations of tetrachloroethene (PCE), the contaminant of concern, in an effective manner, that is protective of the public health and safety and the environment. The Removal Action Workplan (RAW) identifies construction and operation of a soil vapor extraction (SVE) and treatment system as the remedy to address the PCE in the soil vapor.

Background:

The Palo Alto Town & Country Village Site (Site) consists of approximately 13 acres and is an occupied retail shopping center comprised of five multi-tenant buildings identified as Building 1 through Building 5 and a sixth building solely occupied by a grocery store. The Site contains approximately +/- 100 tenant spaces. Tenants include mostly high-end retail shops and restaurants. The Site was developed between 1952 and 1956 for retail purposes. Prior to development, the Site was vacant except for one large residence. The Site was not previously used for agricultural purposes. A previous dry cleaner operated out of a since-demolished building between circa 1958 and 1965. The dry cleaner is believed to have used PCE in its operations and is believed to be the primary source of previous releases of PCE to the subsurface.

Investigations conducted since 1998 have indicated the presence of PCE in soil vapor and groundwater at the Site. However, concentrations in groundwater are at relatively low concentrations, not a significant concern, and thus will not be addressed by the RAW. The PCE impact in soil vapor appears to be mainly limited to an area of the parking lot between Encina Avenue and Building 3, although PCE impacts may extend below the footprints of Building 3 and Building 5. Soil vapor monitoring points will be placed beneath the footprints of Building 3 and Building 5 to evaluate PCE concentrations in soil vapor. A pilot test lasting one week was conducted in October 2017 to evaluate the effectiveness of a SVE system. The results indicated that SVE was effective in removing PCE from soil vapor. A removal goal of 2,000 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) has been established for PCE in soil vapor.

Project Activities:

The project activities described in the RAW are the implementation of a SVE and treatment system to address the elevated concentrations of PCE in soil vapor on a limited portion of the Site. Soil vapor extraction wells and soil vapor probes for monitoring will be installed at the Site. A mobile SVE system will be used at the Site. The piping, blower, and vapor treatment unit will be fenced off from public access. SVE wells will be connected to the mobile SVE system using quick-connect couplings and two-inch-diameter flexible hoses. Extracted vapors will be treated using carbon.

The SVE system will be comprised of seven SVE wells. Five of the SVE wells will be new and meant to complement the existing two SVE wells. Ten new soil vapor sampling points will be installed to assist in further defining source area concentrations of PCE in soil vapor and to evaluate the effectiveness of the proposed remediation by SVE. These ten new soil vapor sampling points will complement the existing ten soil vapor sampling points. Prior to installation of the extraction wells and monitoring points, a utility survey will be conducted to confirm the absence or presence of any utility lines. The wells will be installed using a drilling rig or by hand auger to depths of 5 feet below ground surface (ft bgs) or 20 ft bgs depending on the well specifications. All investigation-derived waste will be properly profiled and disposed at an off-Site, permitted facility.

Vapor emissions from the treatment unit will comply with the standards specified in the SVE permit from the Bay Area Air Quality Management District (BAAQMD). The vacuum will be periodically measured from SVE wells to evaluate the extraction rate and effectiveness of the SVE. VOC concentrations from the extraction wells will be monitored using a photoionization detector. To comply with BAAQMD permit requirements, the influent and effluent vapor samples will be collected in 1-liter SUMMA canisters within the first 24 hours of the initial SVE event/equipment operation.

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

Name of Person or Agency Carrying Out Project: Ronald & Ann Williams Charitable Foundation

Exemption Status: (check one)

- ☐ Ministerial [PRC, Sec. 21080(b)(1); CCR, Sec. 15268]
☐ Declared Emergency [PRC, Sec. 21080(b)(3); CCR, Sec. 15269(a)]
☐ Emergency Project [PRC, Sec. 21080(b)(4); CCR, Sec. 15269(b)(c)]
☒ Categorical Exemption: [Class 30 Categorical Exemption Cal. Code Regs., Title 14, §15330]
☐ Statutory Exemptions: [State code section number]
☐ General Rule [CCR, Sec. 15061(b)(3)]

Exemption Title: Minor actions to prevent, minimize, stabilize, mitigate or eliminate the release or threat of release of hazardous waste or hazardous substances.

Reasons Why Project is Exempt:

- 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.
- The project will not exceed \$1 million in cost.
- The project does not involve the onsite 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 as defined in Health and Safety Code Section 25123. The SVE system will comply with the standards specified in the SVE permit from BAAQMD.
- The exceptions pursuant to Cal. Code Regs., tit. 14, § 15300.2 have been addressed as follows:
 - Cumulative Impact. The final remedy will 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 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. (<http://calepa.ca.gov/sitecleanup/corteselist/default.htm>)
 - Historical Resources. The project will not cause a substantial adverse change in the significance of a historical resource at the Site because there are none at the Site.

Evidence to support the above reasons is documented in the project file record, available for inspection at the following address:

Department of Toxic Substances Control
 Site Mitigation and Restoration Program
 700 Heinz Avenue
 Berkeley, California 94710

Nicole Yuen	Environmental Scientist	(510) 540-3881
Project Manager Name	Project Manager Title	Phone #
<i>Mark Piros</i>		4/15/2019
Acting Branch Chief Signature		Date
Mark Piros	Supervising Hazardous Substances Engineer I	510-540-3832
Acting Branch Chief Name	Acting Branch Chief Title	Phone #

Governor's Office of Planning & Research

TO BE COMPLETED BY OPR ONLY

Date Received For Filing and Posting at OPR:

APR 16 2019

STATE CLEARINGHOUSE

2019048323

Sheila Brown

From: Mahoney, Cheryl@DTSC <Cheryl.Mahoney@dtsc.ca.gov>
Sent: Tuesday, April 16, 2019 8:43 AM
To: OPR State Clearinghouse
Subject: Request for NOE filing - Palo Alto Project
Attachments: Signed NOE.pdf

Hi,

Attached is a revised version of the Notice of Exemption (NOE) for the Palo Alto Town & Country Village project for filing. Please email back a stamped copy of the NOE to Cheryl.mahoney@dtsc.ca.gov for our records. Let me know if you have any questions.

Thank you,

Cheryl

Cheryl Mahoney
Department of Toxic Substances Control
8800 Cal Center Dr.
Sacramento, CA 95826-3200
916-255-3786

Emily
Governor's Office of Planning & Research
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STATE CLEARINGHOUSE