CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION

2019058249

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
5796 Corporate Avenue
Cypress, CA 90630

Project Title: Clow Valve Company Corrective Measures Study
Project Location: 1375 Magnolia Avenue, Corona, 92879
County: Riverside
Project Description: The California Department of Toxic Substances Control (DTSC), reviewed a draft Corrective Measures Study (CMS) prepared for Clow Valve Company (Site) pursuant to regulatory authority granted under the Health and Safety Code, Sections 25187 and 25200.14. This draft CMS was approved for public comment as a proposed remedy, pending public comment and review.

The CMS project activities addressed potential health risks attributed to the historic operations that resulted in lead contamination in shallow soil at multiple locations throughout the Site. Diesel fuel contamination had been identified beneath a former fuel tank and impacts by polychlorinated bi-phenyls (PCBs) are present in the soil beneath an electrical transformer. The CMS summarized the findings from previous investigations and recommended excavation with off-Site disposal, engineering controls (capping system), and institutional controls to address the Site contamination.

Background:
The 16-acre Site is located in an industrial/ commercial area, east of 1-15 Freeway. The Site is bordered by a storm channel of the north and by a rail road on the west. Approximately 60% of the site is developed with warehouses and 40% is asphalt-paved parking and unpaved areas.

Clow Valve Company has manufactured fire hydrants and associated equipment at the Site beginning in approximately 1972. Prior to Clow Valve, the American Foundry manufactured iron pipes and fittings at the Site from approximately 1950s until it was purchased by Clow Valve in 1972. Clow Valve discontinued fueling operations in their rail-spur area in late 1970 and shut down iron and brass foundries in 1991.

Current operations at the Site include: machining, assembly, pressure-testing, and painting fire hydrants, valves, and associated equipment, rubber couplings manufacture, product storage, and distribution.

Following a compliance inspection by DTSC in 2000, Clow Valve entered into a Corrective Action Consent Agreement with DTSC to investigate and remediate releases of hazardous waste identified by the inspection. Under DTSC oversight, Clow Valve removed and transported for disposal at an off-site permitted disposal facility 393 cubic yards of foundry sand contaminated by lead, copper, and zinc in 2005. Extensive soil, soil gas, and groundwater investigation was completed in 2017.

The following chemicals of potential concern (COCs) were found in the soil at the site above the background levels: Polychlorinated Biphenyl's (PCBs), Total Petroleum Hydrocarbons (TPH), antimony, cadmium, hexavalent chromium, copper, lead, and mercury. A petroleum solvent, 1,1,2,2-tetrachloroethatne, was detected in the soil gas. No chemicals were detected in the groundwater above their respective California Department of Health Maximum Contaminant Levels or background concentrations. A Human Health Risk Assessment (HHRA) was performed to evaluate the potential health risks associated with exposure of workers at the Facility to COCs. Based on the HHRA, potential health risk to a commercial or industrial worker is $1x10^{-5}$ and to a construction worker is $2x10^{-4}$. The PCBs (Aloclors) are the major contributors to the human health risk at the Area of Concern (AOC)-7 and will be excavated. A non-cancer health hazard index (HI) was also evaluated. The estimated HI for a commercial/ industrial worker at the facility is 2.0 primarily due to the potential exposure to Aloclors and cadmium. The estimated HI for a construction worker at the facility is 458. US EPA recommends an IH of 1 or below and health risk below $1x10^{-6}$. Lead levels in on-site shallow soil samples were reported above 320 milligrams per kilogram, a level deemed safe by DTSC for the continued use of the Site for Industrial purposes. A cap will be constructed in AOC-1, 5, and 7. Existing surface cover in AOC-2, 3, 4, 6, and 9 at the Site will be repaired and maintained.

Project Activities:
The CMS consists of the following activities:

1) Excavation and offsite disposal of approximately 18 cubic yards of PCBs contaminated soil will be excavated and transported under a manifest to a permitted offsite treatment and disposal facility (to be determined based on

excavated soil characterization). The PCBs contaminated soil is located in the vicinity of a transformer pad, in an approximately 120 feet by 50 feet area with access limited by buildings on three sides. The proposed excavation is approximately 10 feet by 10 feet by 5 feet deep. The goal of the excavation is to remove PCB-impacted soil to below 100 milligram/kilogram (mg/kg) threshold identified in 40 CFR 761.61(a)(4). Confirmation sampling will be conducted in the excavation bottom and side walls. Water spray will be used to eliminate the dust during the excavation. Excavated soil and concrete will be placed directly into designated roll-off bins and require one truck trip.

2) On-Site Asphalt Cap – Construction of a new approximately 5, 000 square foot, 6-inch thick concrete or an asphalt Cap in three areas encompassing approximately one acre (AOC-1, 5, and 7), where PCBs and lead soil levels are potentially above health risk and hazard for the on-site workers.

3) Repair and maintenance of the existing asphalt and or concrete surface cover in AOC-2, 3, 4, 6, and 9.

4) Soil Management Plan – A Soil Management Plan will be prepared and placed in DTSC file to ensure proper soil handling and construction worker safety in all future construction work involving soil excavation at the site.

5) Land Use Covenant (LUC) – A LUC (also known as a deed restriction) will be filed with the Riverside County Assessor's Office to restrict future site redevelopment to commercial/industrial land uses.

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

Name of Person or Agency Carrying Out Project: Clow Valve Company

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 Title 14, Section 15330]
☐ Statutory Exemptions: [State code section number]
☐ General Rule [CCR, Sec. 15061(b)(3)]

Exemption Title: Minor Actions Taken to Prevent, Minimize, Mitigate, or Eliminate the Release or Threat of Release of a Hazardous Waste or Hazardous Substance

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 will not exceed $1 million in cost.
3. 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.
4. The exceptions pursuant to Cal. Code Rags., 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, 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 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 will not cause a substantial adverse change in the significance of a historical resource because there are none at the site.

2019058249

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

Department of Toxic Substances Control
Site Mitigation and Restoration Program
5796 Corporate Avenue
Cypress, CA 90630

Irena Edwards	Environmental Scientist	(714) 484-5385
Project Manager Name	Project Manager Title	Phone #
Acting Branch Chief Signature		5/15/2019 Date
Robert M. Senga	Senior Environmental Scientist (Sup.)	(714) 484-5436
Acting Branch Chief Name	Title	Phone #

TO BE COMPLETED BY OPR ONLY

Date Received For Filing and Posting at OPR:

Governor's Office of Planning & Research
MAY 16 2019
STATE CLEARINGHOUSE