

CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION

2019120627

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
Permitting Division
8800 Cal Center Drive
Sacramento, CA 95826

Project Title: Corteva Agriscience – Pittsburg Operations (f.k.a. The Dow Chemical Company), Monofill Landfill Post-Closure Permit Renewal

Project Applicant: Theresa Williams, Regional EH&S Leader – Pittsburg, Corteva Agriscience

Project Location: 901 Loveridge Road, Pittsburg, CA 94565

County: Contra Costa

Project Description: The Department of Toxic Substances Control (DTSC) is proposing to renew the Hazardous Waste Facility Post-Closure Permit (Permit) for the Monofill Landfill (Monofill) at the Corteva Agriscience – Pittsburg Operations, Pittsburg, Contra Costa County (Facility). The Permit allows the Facility to continue post-closure care activities at the site for 10 more years. The Post-Closure Permit outlines the procedures to fulfill the regulatory requirements which consist of three primary functions: a) maintenance of the closed Monofill cover, b) environmental monitoring; and c) maintenance of financial mechanism to fund the Post-closure activities. No physical changes to the monofill unit are proposed.

Background: The Facility consists of an industrial section of approximately 500 acres, about half of which is undeveloped. The Facility produces products for agricultural operations, pest control services, pulp and paper manufacturers, carpet and flooring mills, and personal care. The Facility is also the location of a bulk chemical storage terminal for the distribution of Corteva Agriscience-produced chemicals.

The solar evaporation ponds were constructed between 1968 and 1981 and were comprised of double-lined impounds that received wastewater discharges from the facility. Wastes directed into the impoundments includes spent air pollution scrubber solutions, process structure washdown water, storm water, and sink washings from the D Research Laboratory. The ponds stopped receiving process wastewater prior to June 1987. Closure operations began in 1988 in accordance with a closure plan approved jointly by San Francisco Bay Regional Water Quality Control Board (SFRWQCB) and DTSC. Closure activities consisted of removing the pond water and dewatering the sediments to remove free liquids. The remaining material was solidified with cement. In addition, the liner system beneath the ponds was upgraded and extended as needed to create the liner system beneath the Monofill footprint. All solidified sediment and contaminate soil, liners, and the leachate collection system were removed and placed in the Monofill. The Monofill contains approximately 91,460 cubic yards of solidified waste.

A crib block containment wall was constructed around the solidified sediments and other wastes materials from the ponds, forming the Monofill. Waste in the ponds was compacted and an impervious cap was constructed. The cap consists of an impermeable liner, gravel and asphalt cover. Leachate collection sumps were constructed in the Monofill. A shallow groundwater extraction system consisting of a French drain and sumps was constructed around the Monofill. Formal acceptance of the impoundment closure from the U.S. EPA and local agencies was achieved in 1988. In the early 1990s, a system of groundwater extraction wells in the mid-level (B-zone) of the underlying aquifer was installed and operated for a brief period of time. However, this system was found to be ineffective, and decommissioned.

On December 13, 2007, DTSC converted the Facility's Interim Status by issuing a RCRA Post Closure Permit. In conjunction with that approval, DTSC filed a Notice of Exemption (NOE) with the State Clearinghouse indicating that the Project was exempt from CEQA under 14 C.C.R. § 15061(b)(3).

In 2013, the shallow groundwater extraction system, consisting of a French drain and sumps, was decommissioned with approval from the SFRWQCB.

On March 1, 2019, The Dow Chemical Company submitted a Class 1* permit modification request for changes to the facility name to Corteva Agriscience – Pittsburg Operations, the owner and operator name to Dow AgroSciences, LLC and the owner of the real property to Centen Ag LLC.

Project Activities: Post closure activities are performed to minimize the potential that chemicals contained in the solidified wastes in the Monofill will be released to the environment and to allow for detection of a release from the unit. These activities include:

1. Routine and annual inspections of the site are conducted to ensure the integrity of the final cover system, surface drainage and control systems, groundwater monitoring system and the security system. Following each inspection, a report or summary of findings describing the condition of the site and the above-mentioned items is submitted to DTSC for review.
2. Sampling and analysis of the leachate from the drainage layer between the bottom liners of the monofill is required quarterly or whenever there is sufficient leachate for removal. The primary chemicals of concern in the Monofill area are carbon tetrachloride and tetrachloroethene. Concentrations of these solvents in leachate extracted from the Monofill have been reported as non-detect to 200 ug/l for carbon tetrachloride and non-detect to 4,900 ug/l for tetrachloroethene.

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

Name of Person or Agency Carrying Out Project: Jeff Cast, The Dow Chemical Company, Pittsburg Plant, Pittsburg California.

Exemption Status:

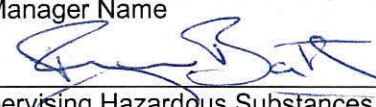
- Ministerial [PRC, Sec. 21080(b)(1); CCR, Sec. 15268]
- Declared Emergency [PRC, Sec. 21080(b)(3); CCR, Sec.15269(a)]
- Emergency Project [PRC, Sec. 21080(b)(4); CCR, Sec.15269(b)(c)]
- Categorical Exemption: [State type and section number]
- Statutory Exemptions: [State code section number]
- Common Sense Exemption [CCR, Sec. 15061(b)(3)]

Exemption Title: With Certainty, No Possibility of a Significant Environmental Effect.

Reasons Why Project is Exempt: The project will not result in a change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. Therefore, DTSC finds with certainty that there is not a possibility that the activities in question will result in a significant environmental effect.

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

Department of Toxic Substances Control
Permitting Division
8800 Cal Center Drive
Sacramento, CA 95826

Elly Daoud	Hazardous Substances Engineer	(916) 255-3573
Project Manager Name	Project Manager Title	Phone #
		11/21/19
Supervising Hazardous Substances Engineer Signature		Date
Ryan Batty, P.E.	Supervising Hazardous Substances Engineer	(916) 255-3612
Supervisor Name	Supervisor Title	Phone #

TO BE COMPLETED BY OPR ONLY

Date Received For Filing and Posting at OPR:

Governor's Office of Planning & Research

DEC 27 2019

STATE CLEARINGHOUSE