CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION

To: Office of Planning and Research
State Clearinghouse
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: Explanation of Significant Differences, Polychlorinated Biphenyl Cleanup, Building 84/84A, Investigation Area D1.3, Lennar Mare Island, Vallejo, California

Project Location: Flagship Drive, Mare Island, Former Mare Island Naval Shipyard, Vallejo

County: Solano

Project Applicant: Lennar Mare Island, LLC.

Approval Action Under Consideration by DTSC: Explanation of Significant Differences for the Building 84/84A Remedial Action in the Investigation Area D1 Remedial Action Plan

Statutory Authority: California Health and Safety Code, Chapters 6.5 and 6.8

Project Description:

The Explanation of Significant Differences (ESD) discusses modifications to the remedy described for Building 84/84A in the Final Investigation Area D1 Remedial Action Plan (RAP) (CH2M Hill, Inc., 2004). The RAP was approved by the California Department of Toxic Substances Control (DTSC) on May 27, 2004. The RAP includes a selected remedy to address polychlorinated biphenyl (PCB) contamination in Building 84/84A, a former United States Department of the Navy (Navy) brig located in Investigation Area (IA) D1.3 within the property known as the Eastern Early Transfer Parcel (EETP) on the Former Mare Island Naval Shipyard, Vallejo, California (Figures 1 & 2). The remedy for Building 84/84A specified in the RAP was listed as “Indoor Air Evaluation”. The proposed modification to the Building 84/84A remedy as explained later in this document includes:

- Perform PCB cleanup consisting of removal of indoor PCB-contaminated site features, including paint, caulk, and non-structural building materials; remediation of PCB-contaminated indoor substrate surfaces (e.g., concrete, wood, metal); post-cleanup characterization of indoor exposed soil and remediation if required; and indoor air evaluation, compared to unrestricted use cleanup levels.

- If achieving unrestricted use cleanup levels is impractical, such as due to potential structural damage to the building, land use controls would be implemented that limit use to commercial/industrial.

The proposed Project will clean up building materials from the interior of Building 84/84A (Figure 3) on Mare Island that contain polychlorinated biphenyls (PCBs) at concentrations that exceed the unrestricted cleanup level. No cleanup of exterior surfaces is proposed as part of the Project. The cleanup will include removal of non-structural building materials and PCB-contaminated paint and materials from interior surfaces such as concrete, wood, metal, and brick. Building materials and indoor air will be sampled to determine when remediation is complete. Previous remediation included removal of portions of the building floor, which resulted in exposed soil within the building. If post-remediation testing identifies soil with PCBs exceeding the unrestricted use cleanup level, the soil will be removed. Removed materials will be hauled off-site by truck for disposal at the appropriate permitted disposal facilities.

Background: Building 84/84A was built in stages beginning circa 1895 and is now composed of mainly a single-story building with variable ceiling height. The building was initially used as a Navy brig and has varied in its uses since 1924 as a Navy publication and printing office and storage. Building 84/84A is currently vacant. The building has a historical designation as a Notable Resource. Exterior alterations to a Notable Resource must be reviewed and receive a Certificate of Appropriateness from the City of Vallejo Architectural Heritage and Landmarks Commission. However, interior alternations do not require a Certificate.

The source of the existing PCB contamination inside Building 84/84A is determined to be a ship paint used on interior surfaces. From the paint, the PCBs migrated into underlying porous building materials, such as concrete and brick, and also volatilized into indoor air.

Historically, the maximum PCB concentrations detected in floor samples inside Building 84/84A (main floor) were 23.5 milligrams per kilogram (mg/kg) in concrete samples and 11.3 micrograms per 100 square centimeters (µg/100 cm^2) in wipe samples. During five remedial action phases from January 2004 to April 2007, concrete and pavement sections of the building floor were removed. In addition, the soil beneath the pavement was also removed, varying from one to five feet below floor surface. On four occasions from May 2004 to June 2007, air sampling was performed in Building 84/84A, and each time the results were above the levels allowable for unrestricted/residential use (3.4 nanograms per cubic meter of air [ng/m^3], the 2004 United States Environmental Protection Agency (USEPA) Preliminary Remediation Goal) with a maximum concentration of 140 ng/m^3.

Below are the unrestricted (residential) use cleanup levels for PCBs established in this ESD:

- 0.22 mg/kg for soil and porous materials
- 10 µg/100 cm^2 for nonporous materials
- 4.9 ng/m^3 for indoor air (the 2022 USEPA Regional Screening Level)

If the multi-phased remediation efforts (removing nonstructural components and paint to the extent feasible without compromising the structural integrity of Building 84/84A) do not achieve the indoor cleanup levels for unrestricted use, sample results will be compared to the commercial/industrial use cleanup levels. Below are the commercial/industrial use cleanup levels for PCBs established in the ESD:

- 0.74 mg/kg for soil and porous materials
- 10 µg/100 cm^2 for nonporous materials
- 21 ng/m^3 for indoor air

The PCB Cleanup Plan is being implemented with DTSC oversight pursuant to California Health and Safety Code Chapter 6.8, Section 25356.1 and the National Oil and Hazardous Substances Pollution Contingency Plan (40 Code of Federal Regulations [CFR] Part 300). PCB sites within the EETP are subject to closure under both the Toxic Substances Control Act (TSCA) under the Consent Agreement and Final Order (CA/FO) (Lennar Mare Island, LLC [LMI] et al., 2001a), signed December 20, 2001, between USEPA and the Navy, with the City of Vallejo and LMI as intervenors, and under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) in accordance with the Consent Agreement (LMI et al., 2001b) signed April 16, 2001, between LMI, the City of Vallejo, and DTSC. Cleanup requirements for PCB-contaminated building interior materials are regulated by USEPA under TSCA pursuant to 40 Code of Federal Regulations Part 761. California Health and Safety Code, Division 20, Chapter 6.5 and 6.8 authorizes DTSC to enter into the above referenced Consent Agreement (LMI et at., 2001b) as the lead oversight regulatory agency under CERCLA.

Project Activities:

The removal of PCB-contaminated materials inside the building will include the following steps (Cleanup Plan for Polychlorinated Biphenyl Remediation Waste at Building 84/84A in Investigation D1.3, Lennar Mare Island, Vallejo, California, Version 6, Weston Solutions, March 28, 2023:

1. Site preparation activities (pre-mobilization planning, mobilization and site set-up, asbestos testing, contaminant containment measures, asbestos and hazardous materials and non-structural building materials removal, and refinement of the existing structural engineering assessment to determine if temporary structural supports are needed during removal of paint and contaminated building materials)

2. Paint removal using wet abrasive blast method to remove all visible paint from interior vertical surfaces (walls), ceiling surfaces, and ceiling supports
3. Surface washing of non-soil floor areas
4. Characterization sampling of building material surfaces previously covered with paint
5. Loadout, transport, and disposal of solid and liquid wastes at a permitted off-site disposal facility
6. Additional structural assessment of the building following paint removal
7. Post-paint-removal indoor air sampling
8. Evaluation of post-paint-removal characterization sampling results
9. Additional removal and sampling of building materials and soil, including structural reinforcement and building repairs, if required
10. Retreatment using wet abrasive blasting
11. Evaluation of retreatment confirmation sampling results
12. Soil sampling and analysis, excavation of PCB-impacted soil, backfill with clean fill material, and placement of excavated soil in covered bins or stockpiles
13. Post-remediation indoor air sampling

All cleanup activities, except for waste removal, will be conducted indoors. Building openings (e.g., doors and windows) will be kept closed during wet abrasive blasting. Building materials removed during site preparation will be stored indoors on plastic tarps or outdoors in covered bins or end-dump debris trailers. Outdoor stockpiles will be minimized, but when needed, any materials will be placed on heavy plastic sheeting and covered with additional plastic sheeting anchored with sandbags to prevent dust emissions. Any outdoor stockpiles will be bermed to prevent run-on from stormwater.

Airborne particulates from indoor wet abrasive blasting will be collected using a high efficiency particulate air (HEPA) filtration venting system that exhausts inside the building. Soil and noncontaminated surfaces inside the building will be covered with plastic tarps. Waste particulates from wet abrasive blasting that land on the tarps will be collected using shovels, placed in sacks, and staged inside the building. Wastewater generated by wet abrasive blasting will be collected with wet-dry vacuums and transferred to sealable plastic containers that will also be staged indoors. During waste removal, wastes staged indoors will be transferred outdoors to transport containers such as end-dumps (for solid and particulates) and poly tanks (for liquids).

Trucks will be used to haul away wastes, with 1 to 4 covered truckloads per day when waste hauling is needed and an estimated total 25 truckloads during the course of the project (estimated 100-day duration). Motorized equipment such as manlifts, skip loaders, skid steers, mini-excavators and forklifts will be used inside the building during implementation of the cleanup. Emissions outdoors are expected to be nonsignificant, since equipment, aside from trucks and other vehicles, will almost entirely be used indoors. Trucks and equipment will be maintained per manufacturer's specifications and idling times will be minimized in accordance with air quality regulations (i.e., Bay Area Air Quality Management District). Rumble strips and track-out pads will be used to remove dirt from tires before trucks and other vehicles leave the project site. Equipment used inside the building during cleanup activities will be decontaminated. Water will be used for outdoor dust suppression, as needed based on visual observation and readings from dust-monitoring equipment. A traffic plan will be implemented to maintain safe conditions as vehicles enter and leave the site. Since most cleanup activities will occur indoors in a closed building, outdoor noise from the project will be minimized. Incoming and outgoing truck traffic for hauling away waste will be limited to hours between 8:00 am and 3:00 pm.

Although not anticipated, in the event biological, cultural, or historical resources are discovered during project activities, work will be suspended while a qualified biologist or cultural or historical resource specialist

assesses the area and arrangements are made to protect or preserve any resources that are discovered. If human remains are discovered, no further disturbance will occur in the location where the remains are found and the County Coroner will be notified pursuant to the Health and Safety Code, Chapter 2, Section 7050.5.

References:

CH2M Hill. 2004. Investigation Area D1 Remedial Action Plan, Lennar Mare Island, Vallejo, California. Final. May.

Lennar Mare Island, LLC (LMI), the City of Vallejo, U.S. Department of the Navy, and the U.S. Environmental Protection Agency (LMI et al.). 2001a. Complaint/Consent Agreement and Final Order between Lennar Mare Island, the City of Vallejo, the U.S. Department of the Navy, and the U.S. Environmental Protection Agency Region IX. EPA Docket No. TSCA-9-2002-0002. December 20.

Lennar Mare Island, LLC (LMI), the City of Vallejo, and the State of California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) (LMI et al.). 2001b. Consent Agreement Between Lennar Mare Island, the City of Vallejo, and the State of California, California Environmental Protection Agency, Department of Toxic Substances Control. April 16.

Weston Solutions, Inc. (WESTON). 2023. Cleanup Plan for Polychlorinated Biphenyl Remediation Waste at Building 84/84A in Investigation Area D1.3, Lennar Mare Island, Vallejo, California, Version 6. March 28.

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

Name of Person or Agency Carrying Out Project: Lennar Mare Island, LLC.

Exempt Status: Common Sense Exemption [14 CCR, Sec. 15061(b)(3)]

Reasons Why Project is Exempt: Based on analysis of the project activities above, DTSC has determined with certainty that there is no possibility that the activities in question may have a significant effect on the existing environment because the project, being mainly indoors, would not result in "a substantial, or potentially substantial, adverse 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." The site is in a previously developed area and does not provide habitat value. The project is consistent with applicable state and local environmental permitting requirements including, but not limited to, air quality rules such as those governing emissions and approved by the regulatory body with jurisdiction over the site (e.g., City of Vallejo; Bay Area Air Quality Management District; etc.). Although Building 84/84A is a Notable Resource, a Certificate of Appropriateness from the City of Vallejo Architectural Heritage and Landmarks Commission is not required because the project will not affect the building exterior.

The administrative record for this project is available to the public by appointment at the following location:

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

Additional project information is available on EnviroStor:
https://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=48330003

Contact Person	Contact Title	Phone Number
Allan Fone	Senior Environmental Scientist	510-540-3836

Approver's Signature:

Date:

April 11, 2023

Approver's Name	Approver's Title	Approver's Phone Number
Juliet C. Pettijohn	Environmental Program Manager I	(510) 540-3843

TO BE COMPLETED BY OPR ONLY

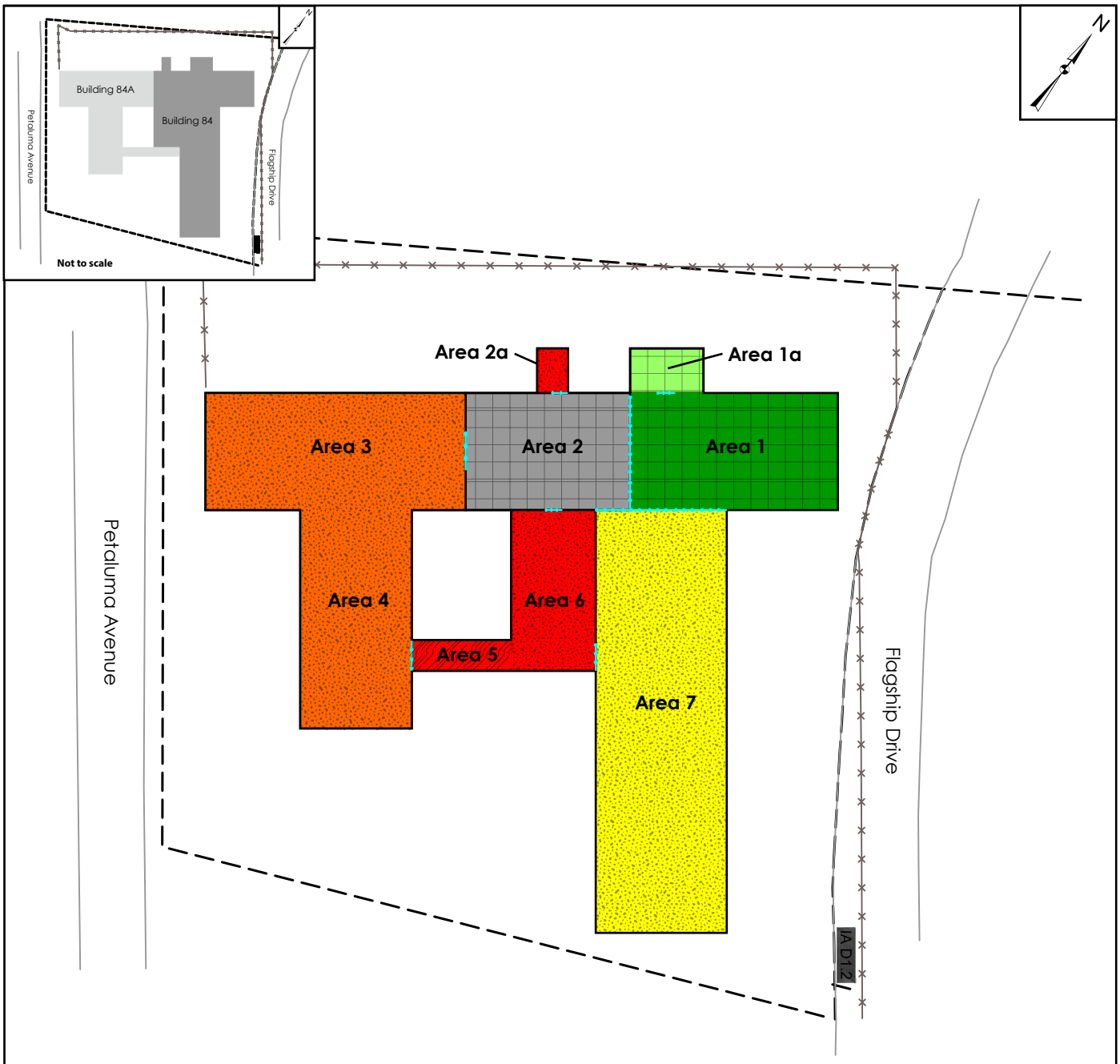
Date Received for Filing and Posting at OPR:

FIGURES

Figure 1
Mare Island Location Map

LENNAR MARE ISLAND
INVESTIGATION AREAS WITHIN THE EASTERN EARLY TRANSFER PARCEL
LENNAR MARE ISLAND, VALLEJO, CALIFORNIA

Figure 2
Building 84/84A Location



Legend

Building Year

- 1895
- 1900
- 1901
- 1909
- 1939
- Post-1939

Building Material

- Brick
- Concrete
- Sheet Metal/Other

Wall Status

- Existing
- Removed

Note: Where doors cut entire walls covered with new construction

Not to Scale

Building 84/84A Areas
Mare Island, CA

Geosyntec consultants

Guelph | November 2019

Figure **3**

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