EXIDE CLEANUP LIMPIEZA DE PLOMO

Department of Toxic Substances Control

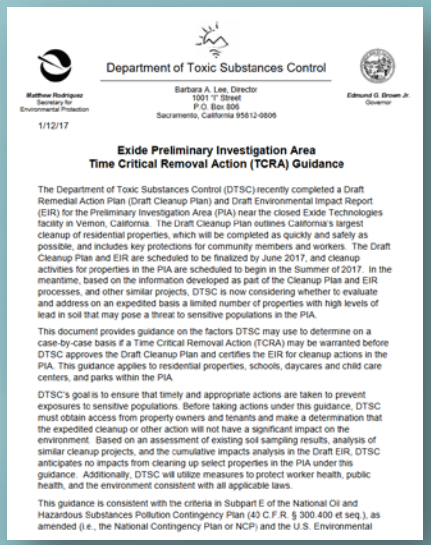
TIME CRITICAL REMOVAL ACTIONS (TCRA) OVERVIEW

EXIDE CLEANUP | LIMPIEZA DE PLOMO

Department of Toxic Substances Control

Time Critical Removal Actions (TCRA)

- DTSC issued Time Critical Removal Action (TCRA) guidance on January 12, 2017.
- The guidance describes criteria for expedited actions that are focused on protecting public health before the Cleanup Plan and Environmental Impact Report (EIR) are certified.
- DTSC will determine the needed actions on a case-by-case basis, analyzing properties with high levels of lead in the soil and the greatest potential exposures to sensitive populations.



Department of Toxic Substances Control

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1/12/17

Exide Preliminary Investigation Area
Time Critical Removal Action (TCRA) Guidance

The Department of Toxic Substances Control (DTSC) recently completed a Draft Remedial Action Plan (Draft Cleanup Plan) and Draft Environmental Impact Report (EIR) for the Preliminary Investigation Area (PIA) near the closed Exide Technologies facility in Vernon, California. The Draft Cleanup Plan outlines California's largest cleanup of residential properties, which will be completed as quickly and safely as possible, and includes key protections for community members and workers. The Draft Cleanup Plan and EIR are scheduled to be finalized by June 2017, and cleanup activities for properties in the PIA are scheduled to begin in the Summer of 2017. In the meantime, based on the information developed as part of the Cleanup Plan and EIR processes, and other similar projects, DTSC is now considering whether to evaluate and address on an expedited basis a limited number of properties with high levels of lead in soil that may pose a threat to sensitive populations in the PIA.

This document provides guidance on the factors DTSC may use to determine on a case-by-case basis if a Time Critical Removal Action (TCRA) may be warranted before DTSC approves the Draft Cleanup Plan and certifies the EIR for cleanup actions in the PIA. This guidance applies to residential properties, schools, daycares and child care centers, and parks within the PIA.

DTSC's goal is to ensure that timely and appropriate actions are taken to prevent exposures to sensitive populations. Before taking actions under this guidance, DTSC must obtain access from property owners and tenants and make a determination that the expedited cleanup or other action will not have a significant impact on the environment. Based on an assessment of existing soil sampling results, analysis of similar cleanup projects, and the cumulative impacts analysis in the Draft EIR, DTSC anticipates no impacts from cleaning up select properties in the PIA under this guidance. Additionally, DTSC will utilize measures to protect worker health, public health, and the environment consistent with all applicable laws.

This guidance is consistent with the criteria in Subpart E of the National Oil and Hazardous Substances Pollution Contingency Plan (40 C.F.R. § 300.400 et seq.), as amended (i.e., the National Contingency Plan or NCP) and the U.S. Environmental

Why DTSC is Issuing This Guidance

- DTSC is issuing this guidance based on:
  - an assessment of sampling results for more than 6,000 properties;
  - an analysis of similar cleanup projects; and
  - the cumulative impacts analysis in the Draft EIR

- DTSC anticipates that there will be no adverse environmental impacts from taking expedited actions on a limited number of properties under this guidance.

Factors DTSC Will Consider

- Soil lead levels of 1,000 ppm or greater, based on 95% Upper Confidence Level (UCL)
  - The 95% UCL is a health protective statistical method that analyzes soil sample results across an entire property and is more health protective than simply averaging the samples.)
- Presence of sensitive populations
  - Children under the age of seven (7) years or pregnant women
  - Residents with blood-lead levels at or above five (5) micrograms per deciliter (ug/dL)
- Evidence of localized exposures
- The existence of a barrier to exposure (grass, mulch, rock, etc.)
- Other situations or factors that may pose a threat to public health or environment, or may otherwise affect the potential exposure

Implementation

- DTSC has initiated the review of the child care centers and residential properties, and will undertake expedited actions on a case-by-case basis, analyzing properties with high levels of lead in the soil and the greatest potential exposures to sensitive populations.

- DTSC will notify and meet with tenants/property owners to confirm if their property meets the criteria for an expedited action.

- Any actions taken will be conducted with safeguards to address health and safety concerns expressed by community members.

DRAFT CLEANUP PLAN & DRAFT ENVIRONMENTAL IMPACT REPORT

RESIDENTIAL PROPERTIES, SCHOOLS, PARKS, DAYCARES AND CHILD CARE CENTERS

Public Meeting

January 19, 2017

Department of
Toxic Substances Control

Purpose of Public Meeting

- To provide an opportunity for stakeholders to comment and to provide input on the Draft Cleanup Plan and Draft EIR
- Describe the Project and Alternatives
- Discuss key aspects and conclusions
- Outline “next steps” in the process
- ***DTSC wants your input!***

Draft Cleanup Plan*

- Introduction/Overview
- Summary of Sampling and Analysis
- Risk Based Prioritization for Cleanup
- Cleanup Objectives and Goals
- Screening of Cleanup Technologies
- Evaluation and Selection of Cleanup Alternatives
- Responsiveness Summary
- CEQA document

Public Comment

* Remedial Action Plan (Health and Safety Code section 25356.1)

Cleanup Objectives

- Promptly cleanup sensitive land use properties
- Protect the current and future public health
- Minimize the volume of soil to be disposed of in a landfill
- Minimize the need for land use controls
- Restore to existing environment and land use
- Minimize short-term adverse impacts

Relative Risk Score to Prioritize Cleanup

- Exposure Scenario Score
  - likelihood of exposure to lead
  - population being exposed
  - number of individuals being exposed
- The concentrations of lead in soil (95% UCL)
- The Office of Environmental Health Hazard Assessment Screening Level for lead in the soil (80 ppm in California)

Process to Selection of Alternative(s)

Step 1
Screening of Technologies

Step 2
Comparison of Alternatives

Step 3
Proposed Alternative(s)

Step 1: Screening of Technologies

Identified and Screened
Cleanup Technologies

Effectiveness

Implementability

Relative Cost

Proven Technologies
Innovative Technologies

Step 2: Comparative Analysis of Alternatives

Alternative 1: No Action *(required under NCP to be considered)*

Alternative 2: Removal and Off-site Disposal to **400 ppm**

US EPA cleanup level

Alternative 3: **Removal and Off-site Disposal to 80 ppm**

DTSC cleanup level

Alternative 4: Phytoremediation

Alternative 5: **Soil Washing**

Alternatives to Disposal

Step 3: Evaluation of Cleanup Alternatives

Five (5)
Alternatives

National Contingency Plan Criteria

Threshold Criteria
Balancing Criteria
Modifying Criteria

Recommended Alternative

US EPA National Contingency Plan criteria

Threshold Criteria

- Overall Protection of Human Health and Environment
- Compliance with Applicable Requirements

Balancing Criteria

- Long term Effectiveness
- Reduction of Toxicity, Mobility and Volume
- Short term Effectiveness
- Implementability
- Cost

Modifying Criteria

- Regulatory Acceptance
- Community Acceptance

Proposed: Alternative 3

- Soil Removal and Off-site Disposal
  - 95% UCL of 80 ppm lead or 18 inches in depth
- Option for:
  - relocation of residents during cleanup
  - interior cleaning by a cleaning service
- Site Restoration with clean backfill, sod, or drought tolerant landscaping
- *Option to Disposal*
  - *Soil Washing (under evaluation with bench scale)*

Proposed: Soil Washing Technology

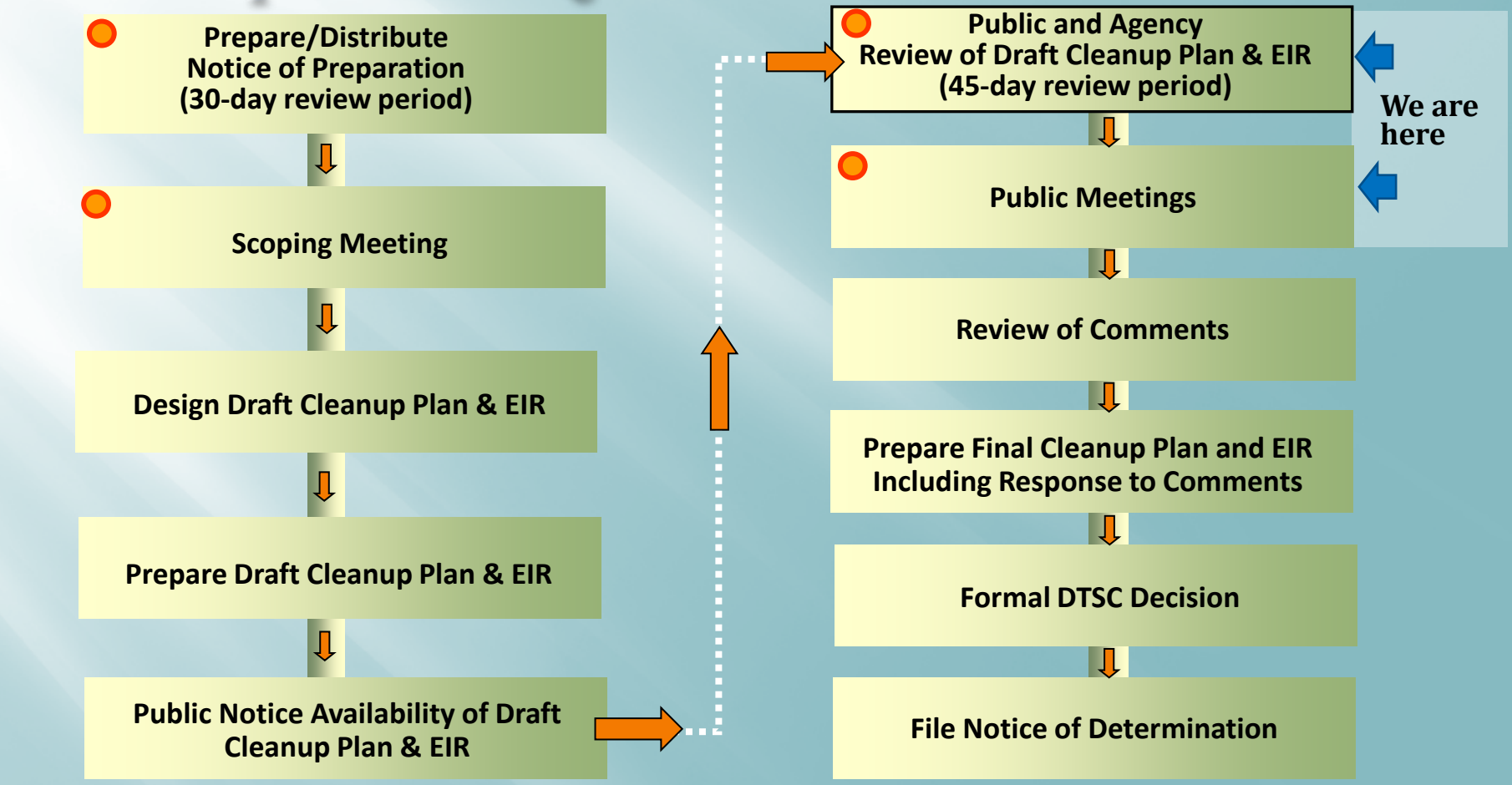
- Bench Scale/Treatability Study (January 2017)
  - Determine if the soils found in the investigation area can be treated
- Can be used to reduce
  - off-site disposal of soil
  - import of clean fill
  - traffic
- In combination with Alternative 3, this would reduce environmental impacts

Summary of Draft Cleanup Plan

- Risk Based Prioritization for Cleanup
- Cleanup Objectives and Goals
- Alternative Screening of Cleanup Technologies
- Evaluation and Selection of Cleanup Alternatives
- Recommended/Proposed Alternative 3 in combination w/Alternative 5

DRAFT
ENVIRONMENTAL IMPACT REPORT

Cleanup and CEQA Administrative Process

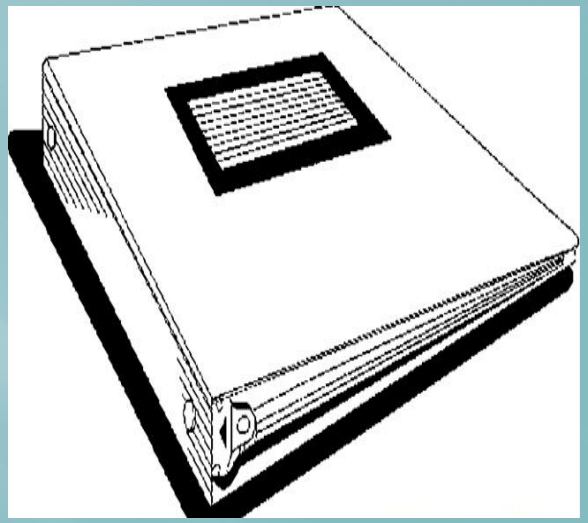


= opportunities for Public Input

What is the Draft EIR?

Purpose of the Draft EIR:

- Inform decision-makers and the public of the potential environmental impacts that could result from the implementation of the Draft Cleanup Plan.
- Identify feasible measures that avoid or reduce potential impacts
- Evaluate a reasonable range of alternatives



Resource Areas Analyzed in the Draft EIR

- Aesthetics
- Agriculture & Forestry
- Air Quality
- Biological Resources
- Cultural Resources
- Geology & Soils
- Greenhouse Gas Emissions
- Hazards & Hazardous Materials
- Hydrology & Water Quality
- Land Use & Planning
- Mineral Resources
- Noise & Vibration
- Population & Housing
- Public Services
- Recreation
- Transportation & Traffic
- Utilities and Service Systems
- Energy


KUBOTA

Project Design Features

- **Project Design Features (PDFs) are**:
  - Environmental design elements incorporated into the Project
  - Draft Cleanup Plan includes PDFs to minimize potential environmental effects for:
    - Air Quality, Cultural Resources, Geology and Soils, Greenhouse Gas Emissions, Hazards, Hydrology and Water Quality, Noise and Vibration, and Transportation
  - PDFs will be included in the Mitigation Monitoring and Reporting Program to ensure implementation

Categorizing Potential Impacts

- No Impact
- Less than Significant Impact
- Less than Significant Impact with Mitigation Measures Incorporated
- Significant and Unavoidable

Impact Summary

Issue Area	Less than Significant	Less than Significant with Mitigation	Significant and Unavoidable
Air Quality	• Conflict with air quality plans (AQMD) • Expose sensitive receptors to substantial pollutant concentrations • Create objectionable odors		• Exceed air quality standards for regional emissions • Result in a cumulative increase of criteria pollutants
Cultural Resources	• Substantial change to historical resources • Substantial change to archaeological resources • Disturb human remains • Substantial change to Tribal cultural resources		
Geology and Soils	• Result in substantial soil erosion and soil loss		
Greenhouse Gas Emissions	• Conflict with greenhouse gas reduction plans	• Generate greenhouse gas emissions that may have a significant effect on the environment	

Impact Summary cont.

Issue Area	Less than Significant	Less than Significant with Mitigation	Significant and Unavoidable
Hazards and Hazardous Materials	• Create significant hazard through transport, disposal, and use of hazardous materials • Create significant hazard through reasonably foreseeable upset and accident conditions • Emit hazardous substances near a school • Located on a hazardous materials site pursuant to Government Code section 65962.5 • Interfere with emergency response plan		
Hydrology and Water Quality	• Exceed water quality standards • Substantially alter drainage patterns and increase siltation • Increase runoff resulting in flooding • Contribute runoff that exceeds system capacity or add substantial source of polluted runoff		

Impact Summary cont.

Issue Area	Less than Significant	Less than Significant with Mitigation	Significant and Unavoidable
Noise and Vibration	• Exposure to excessive ground-borne vibration levels		• Conflicts with Maywood & LA City Ordinances • Conflict temporarily with limitations in general plans or Noise Ordinance • Substantial increase in ambient noise levels
Transportation	• Reduce intersection level of service • Conflict with pedestrian, bicycle, and transit access • Interfere with emergency access • Cause roadway hazards		
Solid Waste	• Substantially reduce capacity at landfill facilities • Conflict with applicable statutes and regulations		
Energy	• Inefficient use of energy • Substantial increase in energy demand • Conflict with applicable regulations, policies and standards		

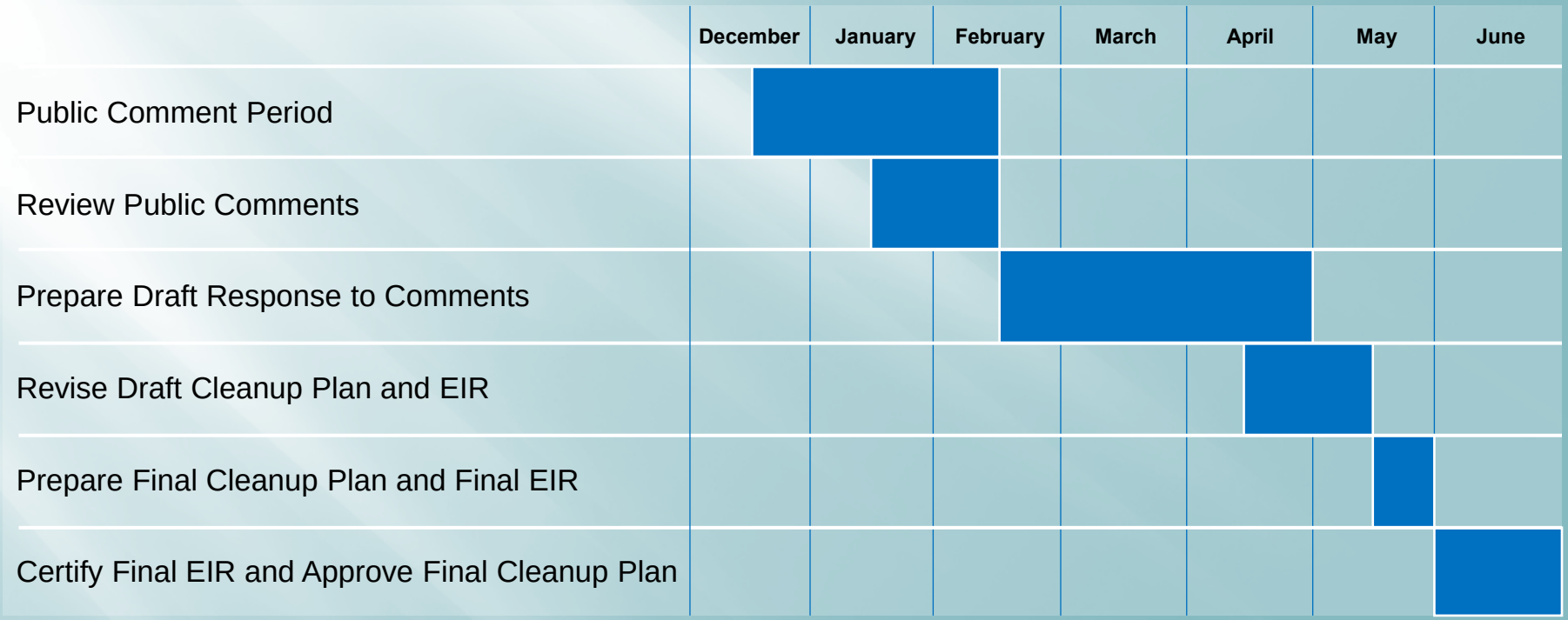
Conclusions – Draft EIR

- Air Quality
  - Use of heavy-duty equipment and vehicle trips would create short-term air quality impacts.
  - Even with applicable regulations and Project Design Features impacts would remain significant and unavoidable.
    - There are no feasible mitigation measures.
- Noise
  - Cleanup activities would increase noise levels at noise sensitive receptors and could conflict with applicable local standards.
  - Even with regulations, PDFs, and Mitigation Measure NOI-1 impacts would remain significant and unavoidable.

Alternatives – Draft EIR

- No Project Alternative (Alternative 1)
  - No cleanup would occur
- Reduced Intensity Alternative (Alternative 2)
  - Slower rate of cleanup (approximately 32 properties per week or 1,650 per year)
- Soil Washing Alternative (Alternative 3)
  - Physical separation process
  - Create a temporary station within the PIA
  - Reuse of soil

What Happens Next?



HOW TO SUBMIT COMMENTS

DRAFT REMEDIAL ACTION (CLEANUP) PLAN & DRAFT ENVIRONMENTAL IMPACT REPORT

All comments must be postmarked or e-mailed by February 15, 2017

Submit your Comments TODAY

- **Verbal**
  - Complete a Speaker Card
- **In Writing**
  - DTSC has provided a computer in the back of this room. A DTSC representative can assist you in submitting comments on the computer.
  - Alternatively, you can mail in your comment card as noted on the card.

Other Options to Submit Comments

- **US Mail**:

  Attn: Ms. Hortensia Muniz

  Department of Toxic Substances Control

  8800 Cal Center Drive

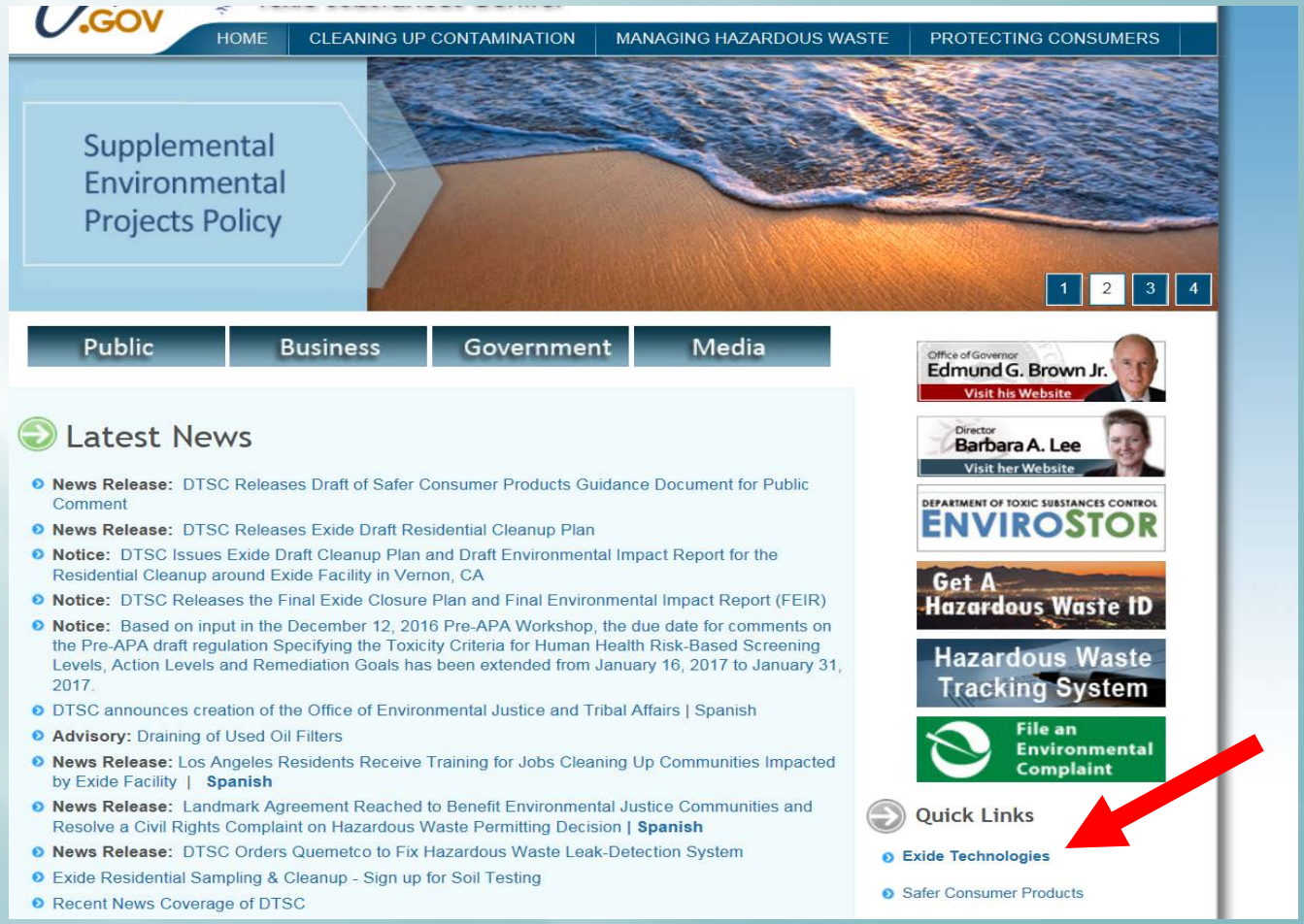
  Sacramento, CA 95826

- **E-mail**: ExidePIACleanup@dtsc.ca.gov

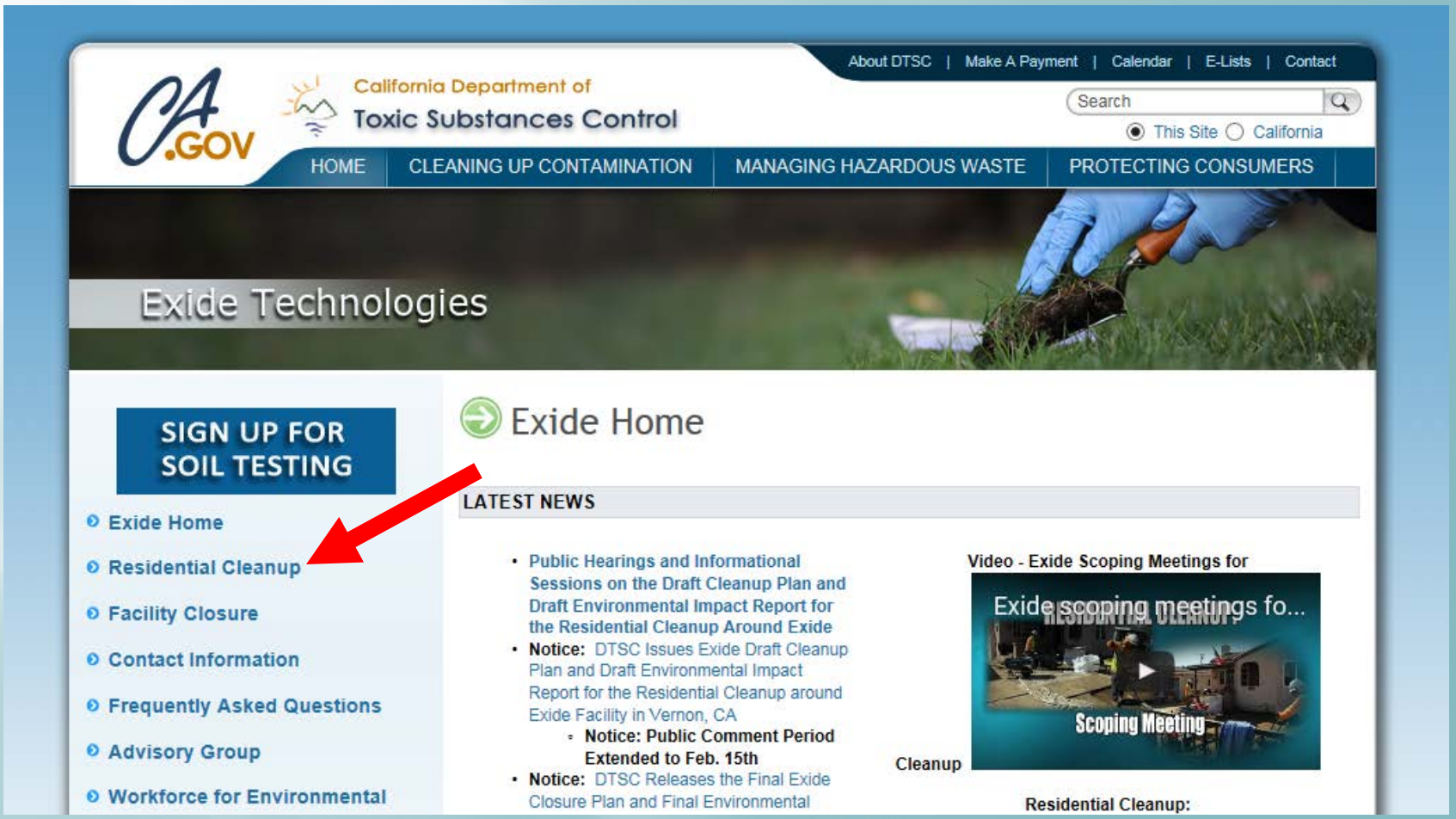
- **Website:**

http://www.dtsc.ca.gov/ResidentialCleanup

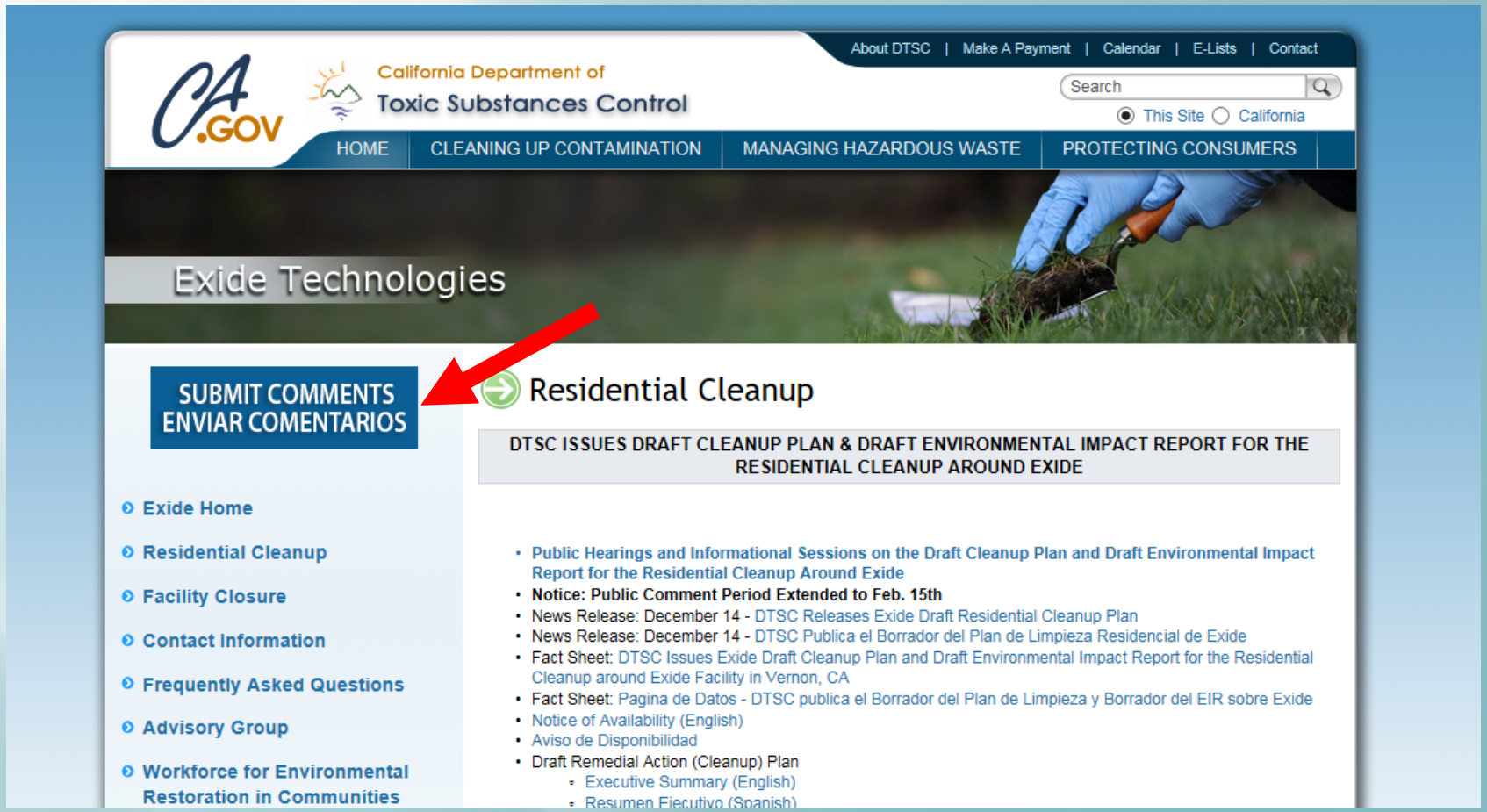
Website Option

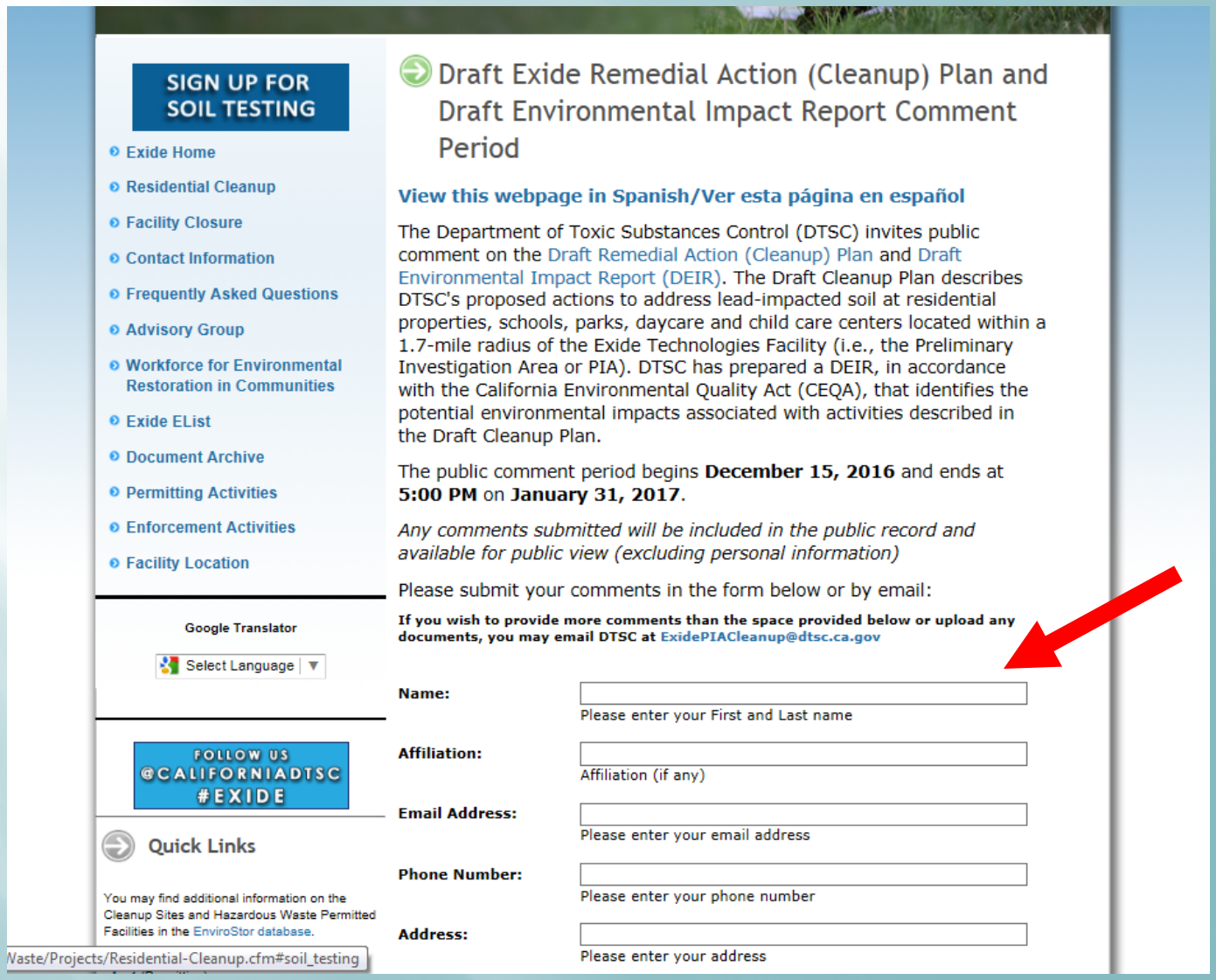


Click on Residential Cleanup



Click on Submit Comments





SIGN UP FOR SOIL TESTING

- Exide Home
- Residential Cleanup
- Facility Closure
- Contact Information
- Frequently Asked Questions
- Advisory Group
- Workforce for Environmental Restoration in Communities
- Exide EList
- Document Archive
- Permitting Activities
- Enforcement Activities
- Facility Location

Google Translator

Select Language

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Quick Links

You may find additional information on the Cleanup Sites and Hazardous Waste Permitted Facilities in the EnviroStor database.

Waste/Projects/Residential-Cleanup.cfm#soil_testing

Draft Exide Remedial Action (Cleanup) Plan and Draft Environmental Impact Report Comment Period

View this webpage in Spanish/Ver esta página en español

The Department of Toxic Substances Control (DTSC) invites public comment on the Draft Remedial Action (Cleanup) Plan and Draft Environmental Impact Report (DEIR). The Draft Cleanup Plan describes DTSC's proposed actions to address lead-impacted soil at residential properties, schools, parks, daycare and child care centers located within a 1.7-mile radius of the Exide Technologies Facility (i.e., the Preliminary Investigation Area or PIA). DTSC has prepared a DEIR, in accordance with the California Environmental Quality Act (CEQA), that identifies the potential environmental impacts associated with activities described in the Draft Cleanup Plan.

The public comment period begins **December 15, 2016** and ends at **5:00 PM** on **January 31, 2017**.

Any comments submitted will be included in the public record and available for public view (excluding personal information)

Please submit your comments in the form below or by email:

If you wish to provide more comments than the space provided below or upload any documents, you may email DTSC at ExidePIACleanup@dtsc.ca.gov

Name:
Please enter your First and Last name

Affiliation:
Affiliation (if any)

Email Address:
Please enter your email address

Phone Number:
Please enter your phone number

Address:
Please enter your address

Summary: Draft EIR and Comment Process

- Draft EIR Available for Review on DTSC's Website and at Repositories
- Draft EIR has Executive Summary in English and Spanish
- Findings - Potential for Significant and Unavoidable Impacts
  - Air Quality and Noise
- Submit Comments:
  - Verbally at public meetings
  - Written by U.S. Postal Service mail, email, or on DTSC's website

Verbal Comments - Process

- Complete a Speaker Card
  - If needed, request Spanish translation
- Speakers will be called to the microphone in order received
- Speak into microphone
  - Provide your name and affiliation (if any)
- Time will be limited so that all interested persons have time to comment; please limit comments to time allotted