

NOTICE OF EXEMPTION

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 Program
700 Heinz Avenue
Berkeley, CA 94710

Project Title: **Approval of the Memorandum for a Time Critical Removal Action at the Former Forest Products Laboratory Wood Treatment Laboratory, University of California, Berkeley, Richmond Field Station**

Project Location: **1301 South 46th Street, Richmond**

County: **Contra Costa**

Project Description:

The Time Critical Removal Action addresses soil impacted with arsenic above commercial/industrial cleanup goals. The proposed removal action for the soil consists of excavation and offsite disposal of approximately 100 cubic yards of soil containing arsenic to achieve commercial/industrial cleanup goals. The expected excavation depth is approximately 2 feet in most areas and to 4 feet in two areas.

Background:

The University of California Richmond Field Station (Richmond Field Station) is approximately 152 acres and consists of 100 acres of uplands, with the remainder of the property consisting of tidal marsh or bay lands. The former Forest Products Laboratory Wood Treatment Laboratory (FPL Wood Treatment Laboratory) is located in the northeastern portion of the Richmond Field Station. The FPL Wood Treatment Laboratory was constructed in 1965 and operated by the UC Berkeley College of Natural Resources as an academic research facility. The FPL Wood Treatment Laboratory was located to the south of Forest Products Laboratory Building 478, between buildings 472 and 476. Research studies relating to wood treatment with pentachlorophenol (PCP) in liquefied petroleum gas (LPG) and isopropyl ether cosolvents were conducted at the FPL Wood Treatment Laboratory until 1970 or 1971. The facility then converted to treating wood with water-based chromated copper arsenate (CCA) and ammoniacal copper arsenate (ACA) compounds. The chemicals were stored in an aboveground tank at the FPL Wood Treatment Laboratory and plumbed to a treatment chamber used to conduct experiments. Beginning some time in the 1980's the facility was also used for fire retardant studies with non-hazardous ammonium phosphate solutions. These wood treatment and flame retardant experiments continued into the early 1990s.

During the early 1990s, planning for the expansion of Building 472 led to an investigation of possible releases of the treatment compounds onto the surrounding asphalt and soils. LPG with dissolved PCP reportedly was released through a vent pipe at the back of the wood treatment chamber on the soils of the wooded area to the east of Building 472. Additionally, CCA and ACA compounds reportedly leaked onto the asphalt surface around the treatment equipment. The leaked material was then reportedly hosed onto the soil to the east, and into the grassy swale to the south of Building 472. Ammoniated water used to rinse the surface of the freshly treated lumber with ACA was also reportedly discharged, primarily to the grassy swale.

Because of the suspected leaks from laboratory equipment and from housekeeping procedures, soil samples from the area were collected by the University of California and tested for metals, semi-volatile organic compounds (SVOCs), and polychlorinated biphenyls (PCBs). Based on the soil data collected, arsenic was identified as the chemical of concern and appears to have been released from the two former vent pipes extending from the wood treatment equipment. Arsenic was limited to the upper 4 feet of soil.

Soil Sampling Results.

- Arsenic was detected at levels up to 1,300 mg/kg. 36 of the 67 samples analyzed for arsenic exceeded the screening level of 12 mg/kg established for a construction worker. A level of 16 mg/kg was established as the provisional site specific background value. All other metals were not detected or found below their associated commercial/industrial screening goals.

- None of the 9 soil samples analyzed for semi-volatile organic compounds (SVOCs) contained SVOCs above their associated detection limits.
- None of the 5 soil samples analyzed for PCBs contained PCBs above their associated detection limits.

Project Activities

The proposed remedial action for the soil consists of the excavation and offsite disposal of soil containing arsenic to achieve commercial/industrial cleanup goals. The project activities will consist of:

1. Soil Excavation. Approximately 100 cubic yards of soil containing arsenic above commercial/industrial cleanup goals will be excavated using an excavator. The excavation will be conducted in two foot lifts. Excavated soil will be directly loaded into 20 cubic yard covered roll-off bins and then trucked offsite to a properly permitted disposal facility.
2. Soil samples will be collected and analyzed following excavation to ensure that soil cleanup goals have been achieved. The soil cleanup goal for arsenic is 16 mg/kg (provisional background concentration) and will be applied as a not to exceed goal.
3. Personal protective equipment will be donned, as required, in a site-specific health and safety plan which complies with Title 8, California Code of Regulations and 29 Code of Federal Regulations, section 1910.120.
4. Roll-off bins will be covered, loaded onto trucks and travel offsite to an appropriately permitted disposal facility. Five roll-off bins (5 truck trips) would be required to dispose of the excavated soil. This should not significantly impact traffic in the area. Trucks exiting the Site will travel west on Meade Street for approximately 1/3 mile, then take the Regatta on-ramp to Interstate 580 and proceed to Interstate-80.
5. Excavated areas will be backfilled with clean fill and graded to pre-existing conditions.

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

Name of Person or Agency Carrying Out Project: University of California, Berkeley

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

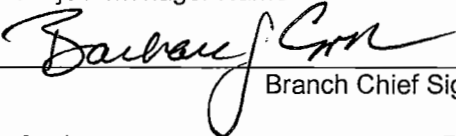
Exemption Title: With certainty, no possibility of a significant environmental effect.

Reasons Why Project is Exempt: The project will not have a significant effect on the environment because:

The project is a small removal action that costs under \$53,000. A licensed hazardous waste contractor will excavate the approximately 100 cubic yards of soil over one week. Actual excavation work is anticipated to take 3 days. There are no endangered species, either plant or animal, or sensitive habitat in the vicinity of the FPL Wood Treatment Laboratory. There are no known cultural resources areas in the vicinity of the site. The closest residence is approximately 950 feet to the north, across from Interstate-580.

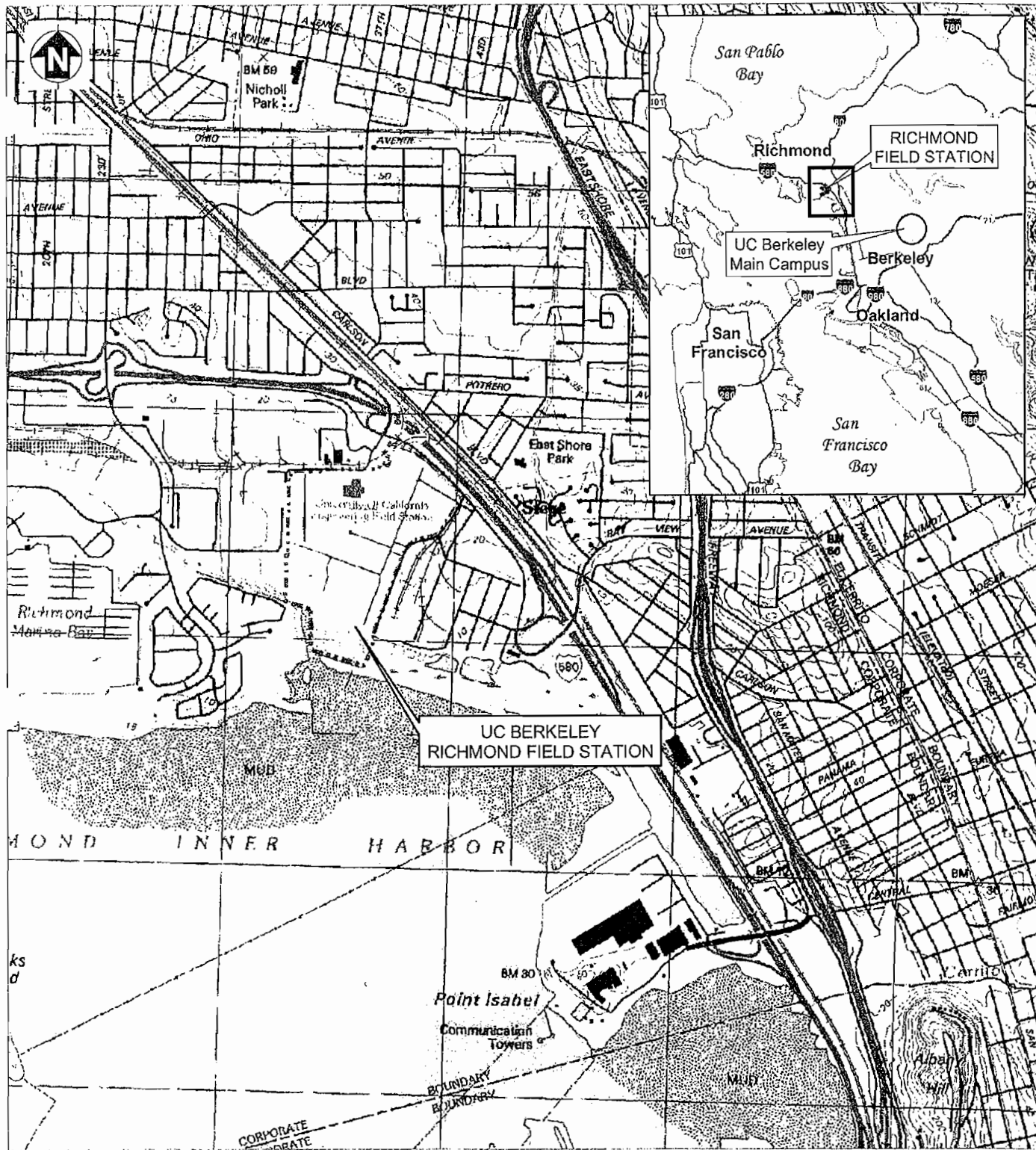
Controls measures have been included in the Time Critical Removal Action to minimize potential for impacts to the environment during the soil excavation activities. The following controls will be required to assure that there will not be a significant environmental effect:

1. Dust control measures will comply with the Bay Area Air Quality Management District (BAAQMD) best available control technologies for construction activities to protect onsite and offsite receptors from chemicals in soil and nuisance dust. These measures include spraying water on the Site, as-needed, for dust control and covering roll-off bins. This will also ensure compliance with the Occupational Health and Safety Administration (OSHA) Permissible Exposure Level (PEL) for Nuisance Dust. Real-time air monitoring for dust will be conducted to ensure adequate dust control measures are being implemented.
2. Site workers will comply with the health and safety requirements of Title 8, California Code of Regulations and 29 Code of Federal Regulations, section 1910.120.
3. Based upon the site characterization data and the disposal facility requirements, excavated soil will be disposed off-site at a Class I (Kettleman Hills) or Class II landfill facility (Keller Canyon), as appropriate. Any hazardous waste will be transported by licensed hazardous waste transporters to a hazardous waste disposal facility. Non-hazardous soil is will be transported to a Class II land fill facility using appropriately licensed contractors.
4. The work will be conducted Monday through Friday between 8 a.m. and 6 p.m., which is within the hours allowed under the Richmond City Noise Ordinance.

Lynn Nakashima	Senior Hazardous Substance Scientist	510-540-3839
Project Manager Name	Project Manager Title	Phone #
		9/17/2007
	Branch Chief Signature	Date
Barbara Cook	Branch Chief	510-540-3843
Branch Chief Name	Branch Chief Title	Phone #

TO BE COMPLETED BY OPR ONLY

Date Received For Filing and Posting at OPR:

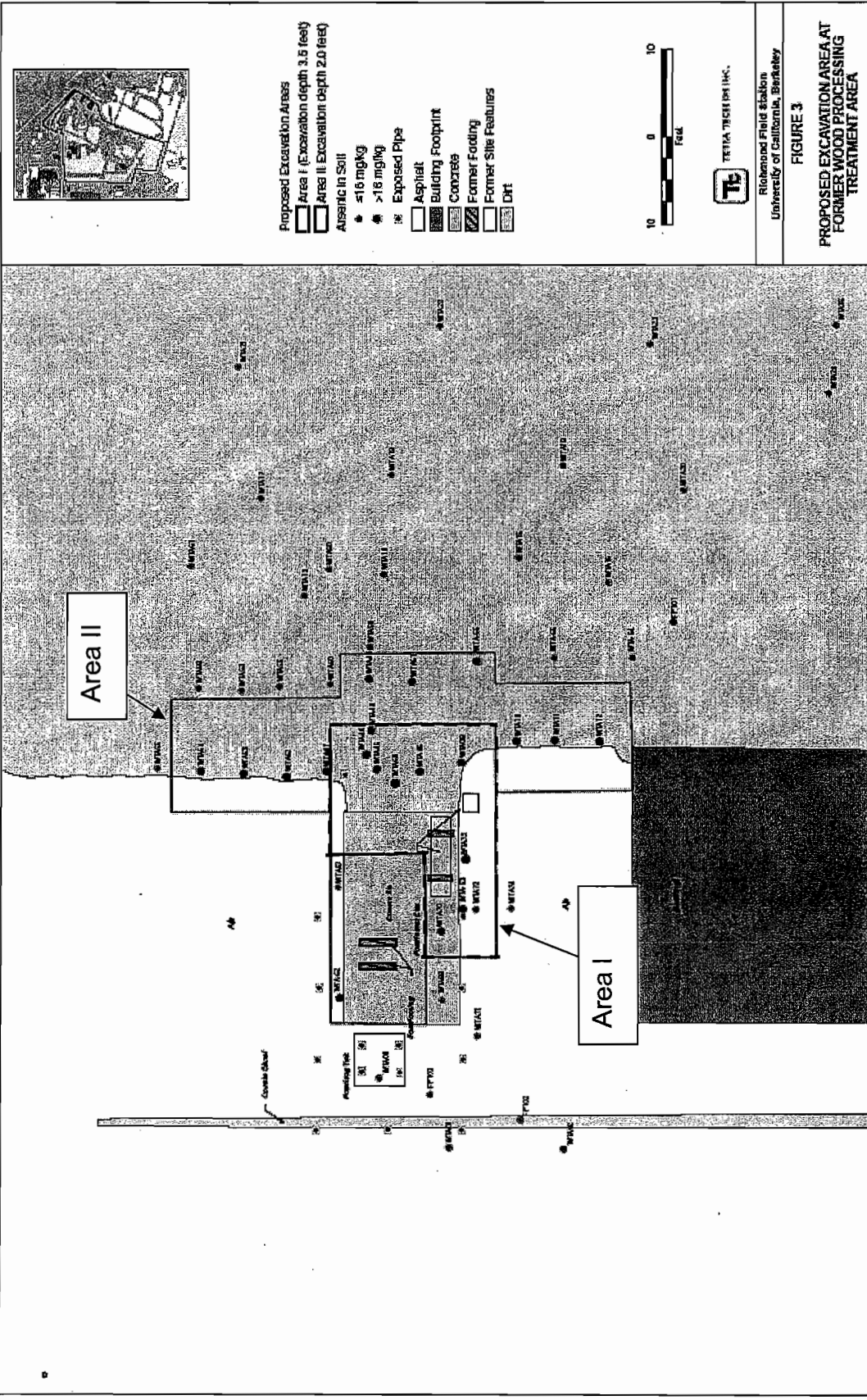


Tt TETRA TECH EM INC.

Richmond Field Station
University of California, Berkeley

**FIGURE 1
SITE LOCATION MAP**

Current Conditions Report



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T TETA TECH INC.
 Richmond Field Station
 University of California, Berkeley

FIGURE 3
PROPOSED EXCAVATION AREA AT
FORMER WOOD PROCESSING
TREATMENT AREA

Figure 3