

APPENDIX G

Environmental Checklist Form

1. Project title: **In-Situ Groundwater Treatment, Former Remco Hydraulics Facility**
2. Lead agency name and address:

North Coast Regional Water Quality Control Board
5550 Skylane Boulevard, Suite A
Santa Rosa, CA 95403
3. Contact person and phone number: Janice M. Goebel, (707) 576-2676
4. Project location: 934 South Main Street, Willits, California, Mendocino County
5. Project sponsor's name and address:
Willits Environmental Remediation Trust (WERT)
6016 Princeton Reach Way
Granite Bay, CA 95746
6. General plan designation: M-G Industrial General
7. Zoning: MH Heavy Industrial
8. Description of project: (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary.)

The Willits Environmental Remediation Trust (WERT) is proposing to conduct interim remediation activities, specifically to treat groundwater in-place (in-situ) that is contaminated primarily with volatile organic compounds (VOCs) using a pesticide-free food grade molasses and yeast. The project, called an interim remedial action (IRA), is detailed in documents titled: *Interim Remedial Action Work Plan for In-Situ Treatment of VOCs in Shallow Groundwater* dated November 2007; which was submitted for the Regional Water Board's consideration of Waste Discharge Requirements under applicant's Report of Waste Discharge (ROWD). The IRA has identified four initial areas for molasses injections (identified on Figure 2), and additional injections to other areas of the site. This document analyzes impacts from similar injections within the entire site area in contemplation of the need for additional injections that will be authorized under the waste discharge requirements. The site includes Assessor Parcel Nos. APN 006-170-X32, APN 006-170-01, APN 006-170-02, APN 006-170-03, 04, 05, 06, 07, 08, 09, 10, 11, 12, 13, and 30.

9. Surrounding land uses and setting: Briefly describe the project's surroundings:
The site, approximately 9.2 acres, is bordered on the east by South Main Street (Highway 101), on the south by railroad lines, with residential homes and Baechtel Grove School to the south of the railroad line, on the west by horse corrals, residential homes and commercial structures, and on the north by Franklin Street and residential homes
10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.)

Mendocino County Environmental Health Department will issue permits for borings and/or groundwater

monitoring wells.

Mendocino County Air Pollution Control District may issue a permit if the contractor brings a portable generator to the site exceeding 50 h.p. and it is separate from the drilling rig.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

Aesthetics	Agriculture Resources	<input checked="" type="checkbox"/> Air Quality
Biological Resources	Cultural Resources	Geology /Soils
<input checked="" type="checkbox"/> Hazards & Hazardous Materials	<input checked="" type="checkbox"/> Hydrology / Water Quality	Land Use / Planning
Mineral Resources	<input checked="" type="checkbox"/> Noise	Population / Housing
Public Services	Recreation	Transportation/Traffic
Utilities / Service Systems	Mandatory Findings of Significance	

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

- X I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided

or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources

for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

- 7) **Supporting Information Sources:** A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significance

Issues:

DRAFT

INITIAL STUDY/CHECKLIST

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
1. AESTHETICS -- Would the project:				
a) Have a substantial adverse effect on a scenic vista?	_____	_____	_____	_____X_____
The project site does not currently provide views over a large area and the proposed project will not establish those types of views. The viewshed of the project area as seen from afar will not substantially change as a result of the project. (1)				
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	_____	_____	_____	_____X_____
The project is not within sight of any state scenic highway, and the project would not result in the damaging of scenic resources, as there are no trees, rock outcroppings, and historic buildings within a state scenic highway. (1)				
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	_____	_____	_____	_____X_____
The project site will not change the existing visual character or quality of the site and its surroundings. (1)				
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	_____	_____	_____	_____X_____
The project will not create a new source of substantial light or glare. No lights are proposed to be installed as part of the project. (1)				
2. AGRICULTURE RESOURCES: In determining whether impacts to	_____	_____	_____	_____X_____

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:				

The project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses. The project site is zoned heavy industrial for the Remco Hydraulics Facility, and commercial with public occupancy on the former Luna Market property. (1, 5)

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	_____	_____	_____	_____X_____
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The project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses. The project site is zoned heavy industrial for the Remco Hydraulics Facility, and commercial with public occupancy on the former Luna Market property. (1, 5)

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	_____	_____	_____	_____X_____
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The project site is not zoned for agricultural use and is not protected under an existing Williamson Act contract. (1, 5)

c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	_____	_____	_____	_____X_____
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Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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Agricultural uses do not exist at the project site. (1)

3. AIR QUALITY -- Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?

_____	_____	_____	_____ <u>X</u> _____
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The proposed project is within the jurisdiction of the Mendocino County Air Pollution Control District (MCAPCD). The MCAPCD has currently drafted an air quality plan, but the plan has not yet been adopted. The draft plan focuses on particulate matter, as the air quality in the County is out of compliance with particulate levels. The project will not conflict or obstruct implementation of the applicable air quality plan. (1, 3)

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

_____	_____	_____ <u>X</u> _____	_____
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Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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The air quality in Mendocino County exceeds the State requirements for particulate matter as discussed in 3(a) above. Mobilization of a drilling rig to inject the molasses may need to acquire a State Portable Equipment Permit if: 1) the drilling rig has a portable diesel engine over 50 h.p., and 2) the diesel engine is not the same engine that drives the truck. (21)

The project to inject molasses has the potential to cause odors. Molasses is a sweet smelling product that could potentially become a nuisance to an individual after prolonged exposure. However, the majority of the molasses injections will be conducted inside the building. The injection process is in sealed containers and closed piping, and beneath the surface of the ground. The molasses odors from the injection process will be minimal. The injection process has the potential to generate hydrogen sulfide gas, however, previous air monitoring during two molasses injections did not detect hydrogen sulfide gas in ambient air. Because it has not been generated during two previous pilot studies, and one major interim remedial action, it is highly unlikely that hydrogen sulfide will be generated during this injection process. Vinyl chloride concentrations will increase in groundwater due to the dechlorination process. Vinyl chloride is a breakdown product of parent VOCs tetrachloroethene and trichloroethene in the subsurface. Extensive past air monitoring for hydrogen sulfide and volatile organic compounds did not detect these compounds in ambient air related to the injection of molasses. These past injections were conducted in compliance with previous waste discharge requirements by the Regional Water Board. The other constituents that may be temporarily mobilized to groundwater are iron, manganese, arsenic, and/or antimony. These constituents are not volatile and therefore would not be in present in ambient air. A groundwater monitoring program is proposed, and sampling data will be collected to evaluate whether byproducts generation is occurring. No existing or projected air quality violations have been identified in the area. (1, 3, 4, 10, 24, 25)

Mitigation Measure 3-1:

During the injection process, the building doors will be kept closed to prevent any recalcitrant molasses odors in the area from leaving the building. Groundwater monitoring will determine if metals byproducts and/or volatile organic compound byproducts are mobilized. If mobilized metals and vinyl chloride threatens to migrate off of the Site, groundwater extraction wells located along the property boundary will be connected to the existing groundwater treatment. The purpose of the extraction system is to contain the mobilized byproducts and/or vinyl chloride, and prevent the migration off of the former Remco property. (4)

c) Result in a cumulatively considerable

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?				
Refer to 3(a) and 3(b) above. The proposed project will not result in a cumulatively considerable net increase of any criteria pollutant. There will be a temporary increase in emissions from the drill rig that will be used to inject the molasses, but that will cease upon project completion. (1, 3)				
d) Expose sensitive receptors to substantial pollutant concentrations?	_____	_____	<u> X </u>	_____
See 3b) (1, 3, 4, 10)				
See Mitigation Measure 3.1 above. (4).				
e) Create objectionable odors affecting a substantial number of people?	_____	_____	<u> X </u>	_____
See 3b) above. (1, 3, 4, 10)				
See Mitigation Measure 3.1 above. (4)				
4. BIOLOGICAL RESOURCES -- Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	_____	_____	_____	<u> X </u>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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The project site has been previously disturbed by demolition of the buildings on the north lot, and the rest of the site is completely paved or concreted and/or rocked. There are no natural drainage features at the site. The nearest drainage is to the south of the site and across the California Western Railroad rail tracks, and the project will not disturb this area. (1, 6)

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	_____	_____	_____	_____X_____
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The site is mostly paved with a few areas that are rocked. No riparian habitat exists at the project site. (1, 6)

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	_____	_____	_____	_____X_____
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The site is mostly paved or covered with concrete with a few areas that are rocked. The project site does not contain federally protected wetlands, thus, no wetlands would be directly affected by construction of this project. (1, 6)

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	_____	_____	_____	_____X_____
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As stated above in item 4(a) and 4(b), the project site has been fully and continuously disturbed, and no fish or wildlife habitat exists at the site. (1, 6)

e) Conflict with any local policies or	_____	_____	_____	_____X_____
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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
ordinances protecting biological resources, such as a tree preservation policy or ordinance?				

The project would not conflict with any adopted policies/regulations regarding biological resources. There are several large trees on the former Luna property. The proposed project does not include removal of any trees. The City of Willits and Mendocino County does not have a tree preservation policy or ordinance. (1, 5, 6)

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	_____	_____	_____	_____X_____
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There are no adopted Habitat Conservation Plans or Natural Community Conservation Plans that apply to the project site, and no other approved local, regional, or state habitat conservation plan is applicable to the project site. (1)

5. CULTURAL RESOURCES -- Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	_____	_____	_____	_____X_____
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The Remco facility is not considered a historical resource. Therefore, the project will not result in a substantial adverse change in the significance of a historical resource. (21)

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? See Item 5(a) above.	_____	_____	_____	_____X_____
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c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	_____	_____	_____	_____X_____
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Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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There is no digging associated with this project. The injection of molasses will be conducted by drilling a small diameter hole, approximately 2 inches in size. Groundwater monitoring wells drilled as part of the project have a bore hole diameter of eight or ten inches. The potential for finding paleontological resources during this project is extremely small. (1, 6)

d) Disturb any human remains, including those interred outside of formal cemeteries?	_____	_____	_____	_____ <u>X</u> _____
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No burial sites are known in the vicinity of the project, and most of the project site has already been disturbed by past operations of a machine shop and chrome plating facility. No excavations are planned as part of this project. In the unlikely event that any human remains are unearthed during the project, state law requires that the County Coroner be notified to investigate the nature and circumstances of the discovery. At the time of discovery, work in the immediate vicinity would cease until the coroner permitted work to proceed. If the remains were determined to be prehistoric, the find would be treated as an archaeological site. (1, 5, 6)

6. GEOLOGY AND SOILS -- Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	_____	_____	_____	_____ <u>X</u> _____
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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
<p>The project is located on the eastern edge of the Alquist-Priolo Earthquake Fault Zone. The purpose of the Alquist-Priolo Earthquake Fault Zoning Act is to "...prohibit the location of most structures for human occupancy across the traces of active faults and to thereby mitigate the hazard of fault rupture". The project does not include plans to build any structures in the project area. (1, 6, 8)</p>				
ii) Strong seismic ground shaking?	_____	_____	_____	_____X_____
<p>The project site is within an Alquist-Priolo Earthquake Fault Zone, and strong seismic ground shaking can occur throughout the County. However, the drilling of a small diameter hole and injecting molasses will not result in seismic ground shaking. (1, 6, 8)</p>				
iii) Seismic-related ground failure, including liquefaction?	_____	_____	_____	_____X_____
<p>The project will not result in seismic-related ground failure including liquefaction (1, 8)</p>				
iv) Landslides?	_____	_____	_____	_____X_____
<p>The site is relatively flat and landslides are not likely to occur. (1, 6, 8)</p>				
b) Result in substantial soil erosion or the loss of topsoil?	_____	_____	_____	_____X_____
<p>There will be no disturbance of soil other than vehicles driving over very small unpaved rocked areas on the northwest side of the property, where two homes were previously located. No injections are proposed in this area, but one groundwater monitoring well will be located in this area. The drilling of one groundwater monitoring well would not result in soil erosion or the loss of any top soil. (1, 6)</p>				
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	_____	_____	_____	_____X_____

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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No construction of buildings or digging will occur as part of this project. The project will not result or potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse. (1, 6)

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

_____	_____	_____	_____ <u>X</u> _____
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Table 18-1-B of the Uniform Building Code is an index of the relative expansive characteristics of soil as determined through laboratory testing. Soils have not been tested for this project as no construction of any building is proposed. (1, 6)

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

_____	_____	_____	_____ <u>X</u> _____
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Soil suitability testing for wastewater disposal systems has not been conducted. Wastewater disposal at the City of Willits Sewage Wastewater Treatment Facility is available for any future site development. (1, 6)

7. HAZARDS AND HAZARDOUS MATERIALS – Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

_____	_____	_____	_____ <u>X</u> _____
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The injection of molasses will not result in the generation of hazardous materials that would require off-site disposal. Therefore, no hazardous wastes are proposed for transport, use or disposal as part of the molasses injection activities. The drilling of groundwater monitoring wells will generate soil cuttings that will be disposed off-site in routine transport and disposal procedures, currently in place. Wash water for decontamination of drilling equipment will also be generated, but likely will be treated on-site in the existing treatment system and discharged to the Willits publicly owned treatment works (POTW). (1)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	_____	_____	<u> X </u>	_____

A significant amount of soil and groundwater data exists for the project area. In addition, existing studies have been conducted to demonstrate that the proposed project will effectively remediate soil and groundwater contamination and not cause significant adverse environmental effects. Because of the extensive studies and previous work conducted at the site, it is concluded that the project site has a very low potential for encountering buried hazardous materials such as drums. (7, 9, 10)

There may be some odors associated with the injection of molasses. In addition, the injection of molasses will result in increased concentrations of vinyl chloride due to the dechlorination process, and the potential to temporarily mobilize iron, manganese, arsenic and/or antimony. A groundwater monitoring program will be conducted to evaluate the mobilization of metals and vinyl chloride that may result as part of this project. If mobilized metals and vinyl chloride threatens to migrate off of the Site, groundwater extraction wells located along the property boundary will be connected to the existing groundwater treatment system. The purpose of the extraction system is to capture and contain the mobilized byproducts and/or vinyl chloride, and prevent the migration off of the former Remco property. The extracted groundwater will be treated through the existing on-site groundwater treatment system, and the treated groundwater will be discharged to the Willits POTW. (1, 4, 6, 10)

Refer to Mitigation Measure 3.1.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	_____	_____	<u> X </u>	_____
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Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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No hazardous emissions or the handling of hazardous or acutely hazardous materials, substances or waste is anticipated as part of this project. The former Remco Hydraulics Facility is approximately 300 feet from Baechtel Grove Middle School. The only waste generated will be washwater to decontaminate the equipment between injections points, molasses product if spilled, and soil cuttings from the drilling of groundwater monitoring wells. Neither wastes are considered to be hazardous, hazardous substances, or acutely hazardous. (1, 6)

Refer to Mitigation Measure 3.1.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

_____	_____	_____	_____ <u>X</u> _____
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The former Remco Hydraulics Facility is no longer listed on the Department of Toxic Substances Control’s “Site Cleanup – Site Mitigation and Brownfield Reuse Program Database”. However, the State Water Resources Control Board has generated a list pursuant to Section 65962.5 (Cortese List) in which the Remco Hydraulics Facility is listed. The Hazardous Waste and Substances Sites (Cortese) List is a planning document used by the State, local agencies and developers to comply with the California Environmental Quality Act requirements in providing information about the location of hazardous materials release sites. Government Code section 65962.5 requires the California Environmental Protection Agency to develop at least annually an updated Cortese List. (19, 20, 21) The project does not have the potential to create a significant hazard to the environment or public.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

_____	_____	_____	_____ <u>X</u> _____
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The project site is not located within an airport land use plan or within two miles of a public airport or public use airport. (1, 11)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	_____	_____	_____	_____X_____

The project is not located within the vicinity of a private airstrip. (1, 11)

g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	_____	_____	_____	_____X_____
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The project would not impair implementation of, or physically interfere with the City of Willits' adopted Emergency Operations Plan. The project would not change existing traffic or circulation patterns, and would have no effect outside the project area. (1, 6)

h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	_____	_____	_____	_____X_____
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The project would not be located in an area subject to wildland fires. There are no wildland fire lands for the former Remco Facility in the City of Willits' General Plan. (5, 6)

8. HYDROLOGY AND WATER QUALITY -- Would the project:

a) Violate any water quality standards or waste discharge requirements?	_____	_____	_____	_____X_____
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Draft Waste Discharge Requirements will be considered for adoption for this project. The draft Waste Discharge Requirements will be considered for adoption at the March 6, 2008 Regional Water Board meeting. No violations of the water quality standards or the Draft Waste Discharge Requirements are anticipated to result from the project. (1, 6, 12)

b) Substantially deplete groundwater supplies or interfere substantially with	_____	_____	_____	_____X_____
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Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

The volume that is currently extracted and potentially extracted if the contingency plan is necessary will be minimal. Most newly installed domestic water supply wells are deeper than 20 feet to get a good sanitary seal to prevent the infiltration of potential contaminants such as coliform and bacteria pollutants. Groundwater monitoring will be conducted to evaluate groundwater elevations. (1, 4, 6)

There are no wells in the immediate vicinity of the project. The closest domestic wells are located at 92 Franklin Avenue (approximately 600 feet) and 62 Flower (approximately 500 feet) of the project area. These residences are connected to the City of Willits Municipal Water supply. (6, 7, 13)

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	_____	_____	_____	_____ <u>X</u> _____
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The project will not alter the existing drainage pattern. There are no streams or rivers in the immediate project area, only one storm drain that collects all stormwater runoff from the site. This storm drain system, including all drain inlets are lined to prevent infiltration of groundwater into the stormwater conveyance system. Thus, no contaminated groundwater, nor the molasses injected into groundwater can infiltrate the system.(1, 6)

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which	_____	_____	_____	_____ <u>X</u> _____
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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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would result in flooding on- or off-site?

Refer to 8(c) above. (1, 6)

e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	_____	_____	_____	_____ <u>X</u> _____
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This item is for projects that pave huge areas creating more runoff that could overload existing culverts, etc. The project does not include any paving and will not change any of the existing drainage systems. Therefore, the project will not create or contribute any new stormwater runoff or provide additional sources of polluted runoff. Refer to (c) above. (1, 6)

f) Otherwise substantially degrade water quality?	_____	_____	_____ <u>X</u> _____	_____
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The addition of molasses to groundwater will change the existing water quality in the project area. However, groundwater in the area is contaminated primarily with volatile organic compounds. Other pollutants including chromium, semivolatile organic compounds, and petroleum hydrocarbons also exist at the site. The project of adding molasses to groundwater is designed to reduce groundwater toxicity and enhance cleanup of the aquifer. (1, 6, 9, 10)

g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	_____	_____	_____	_____ <u>X</u> _____
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The project will not include any housing. The project is not located in a flood zone. (14)

h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	_____	_____	_____	_____ <u>X</u> _____
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The project is not within a 100-year flood hazard area. (14)

i) Expose people or structures to a	_____	_____	_____	_____ <u>X</u> _____
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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?				

This item is about projects that could cause flooding or trigger failure of a dam. The site, as it exists today, does not expose people or structures to flooding. The injection of molasses would not change any of the facility. The project will not expose people or structures as a result of flooding or the failure of a levee or dam. (1)

j) Inundation by seiche, tsunami, or mudflow?	_____	_____	_____	_____X_____
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The project site is not subject to seiche or tsunami. (1)

9. LAND USE AND PLANNING -
Would the project:

a) Physically divide an established community?	_____	_____	_____	_____X_____
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The project would not physically divide a community because there is no planned construction activities proposed. The injection of molasses is intended to help accelerate cleanup of the site so the property can be reused at some point in the future and without exposing anyone to the contamination in soil and groundwater. (1)

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	_____	_____	_____	_____X_____
---	-------	-------	-------	-------------

See 9(a) above. The project would not conflict with any applicable land use plan, policy, or regulation. (1, 5)

c) Conflict with any applicable habitat conservation plan or natural community	_____	_____	_____	_____X_____
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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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conservation plan?

There are no habitat conservation plans or natural community conservation plans which affect the project area. (1, 6)

10. MINERAL RESOURCES -- Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

_____	_____	_____	X
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There are no mineral resources known to exist on the project site. (1, 6)

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

_____	_____	_____	X
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Refer to 10 (a) above.

11. NOISE - Would the project result in:

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

_____	_____	X	_____
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The project will not result in exposure of persons to or generation of noise levels in excess of standards. The noise is limited to a drilling rig that will be at the site for approximately one month.

Mitigation Measure 11.1: The project will be conducted in accordance with the City of Willits Noise Ordinance. (1, 15)

b) Exposure of persons to or generation

_____	_____	_____	X
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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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of excessive groundborne vibration or groundborne noise levels?

The project would not generate excessive groundborne vibration. No blasting or similar activity that could create vibration would occur during project construction. A hollow stem auger drill rig and/or a direct push drill rig would not create ground vibrations. (1, 6, 9)

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	_____	_____	_____	_____X_____
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There will be no additional permanent noise associated with the project. The initial injection of molasses will take approximately four weeks to complete. See 11(a) above. Therefore, no permanent increase in noise levels will occur. (1, 6)

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	_____	_____	_____X_____	_____
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The drilling to inject the molasses will increase the noise level in the immediate area during the project. The houses to the north, and west of the sites could be affected by noise from the drilling rig. The drilling activity is limited to the duration of one month during daytime hours. (1, 6, 15)

Mitigation Measure 11.1: The project proponent must comply with the City of Willits Noise Ordinance. (1, 15)

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	_____	_____	_____	_____X_____
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The project is not in the vicinity of a public or private airstrip. (1, 11)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	_____	_____	_____	<u> X </u>

The project is not in the vicinity of a private airstrip. (1, 11)

12. POPULATION AND HOUSING --
Would the project:

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	_____	_____	_____	<u> X </u>
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The project will have no direct or indirect effect on population. (1, 6)

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	_____	_____	_____	<u> X </u>
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Consultants and contractors coming to the site for this project will most likely stay in local hotels. No housing of these workers is necessary and therefore, no housing will be displaced by the project. (1, 6)

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	_____	_____	_____	<u> X </u>
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Refer to 12(b) above. No people will be displaced by the project and therefore no replacement housing is needed. (1, 6)

13. PUBLIC SERVICES

a) Would the project result in substantial adverse physical impacts associated with

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a) Fire and police protection?	_____	_____	_____	_____X_____
b) Schools, parks or other public facilities?	_____	_____	_____	_____X_____

The police and fire departments will continue to provide service to the area. The project will have no effect on population or housing, and therefore no effect on schools, parks or other facilities. (1, 6)

14. RECREATION --

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	_____	_____	_____	_____X_____
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The project will have no effect on population growth or the distribution of the population, and will have no effect on park use. (1, 6)

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	_____	_____	_____	_____X_____
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See item 14(a) above.

15. TRANSPORTATION/TRAFFIC --

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	_____	_____	_____	<u> X </u>

The project would not cause a substantial increase in traffic. A temporary increase in traffic would occur during project construction, in association with on-site workers and transport of a drilling machine. These additional vehicles could consist of a drill rig, pickup truck to support the rig, possibly three to five vehicles to transport the consultant overseeing the project, county environmental health department staff and Regional Water Board staff to observe the project. (1, 6)

b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	_____	_____	_____	<u> X </u>
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See 15(a) above.

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	_____	_____	_____	<u> X </u>
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The project would not cause a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks. (1,6)

d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	_____	_____	_____	<u> X </u>
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The project will not include hazardous design features or incompatible uses. (1,6)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
e) Result in inadequate emergency access?	_____	_____	_____	_____X_____

See item 7(g) above.

f) Result in inadequate parking capacity?	_____	_____	_____	_____X_____
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The existing site has adequate parking to accommodate on-site workers and visitors to the site. (1)

g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	_____	_____	_____	_____X_____
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The project does not affect alternative modes of transportation. (1, 6)

16. UTILITIES AND SERVICE SYSTEMS ¥ Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	_____	_____	_____	_____X_____
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The former Remco Hydraulics facility is served by wastewater lines that connect to a treatment facility operated by the City of Willits. This project will not result in increased sewage flows other than minor amounts for on-site workers. Groundwater extraction, treatment and discharge to the POTW is already occurring. Additional extraction, if necessary from contingency monitoring wells, would be minimal. (1, 6, 16)

b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	_____	_____	_____	_____X_____
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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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The project would not require the construction of new water or wastewater treatment facilities. Water demand and wastewater generation would be minimal due to the type of project proposed. (1, 6)

c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	_____	_____	_____	_____X_____
---	-------	-------	-------	-------------

The project would not require the construction of new storm water drainage facilities or expansion of existing facilities. (1, 6)

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	_____	_____	_____	_____X_____
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Water service is available from the City of Willits to the former Remco Hydraulics facility. (1, 6)

e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	_____	_____	_____	_____X_____
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As discussed under 16 (a) and 16(b) above, there is adequate wastewater capacity to serve the project. (1, 6)

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	_____	_____	_____	_____X_____
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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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The project will not produce a significant amount of waste. Currently contaminated soils generated as part of the on-going soil and groundwater investigation are stored in bins inside the building. The soils are tested and hauled to an approved disposal site. Regular solid waste such as office paper, etc. is collected by the local garbage service. (1, 17, 18)

g) Comply with federal, state, and local statutes and regulations related to solid waste?	_____	_____	_____	_____X_____
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Refer to 16 (f), above.

17. MANDATORY FINDINGS OF SIGNIFICANCE --

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	_____	_____	_____	_____X_____
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No significant habitat would be impacted by the project. As discussed in Section 5, the project would not eliminate important examples of major periods of California history or prehistory.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	_____	_____	_____	_____X_____
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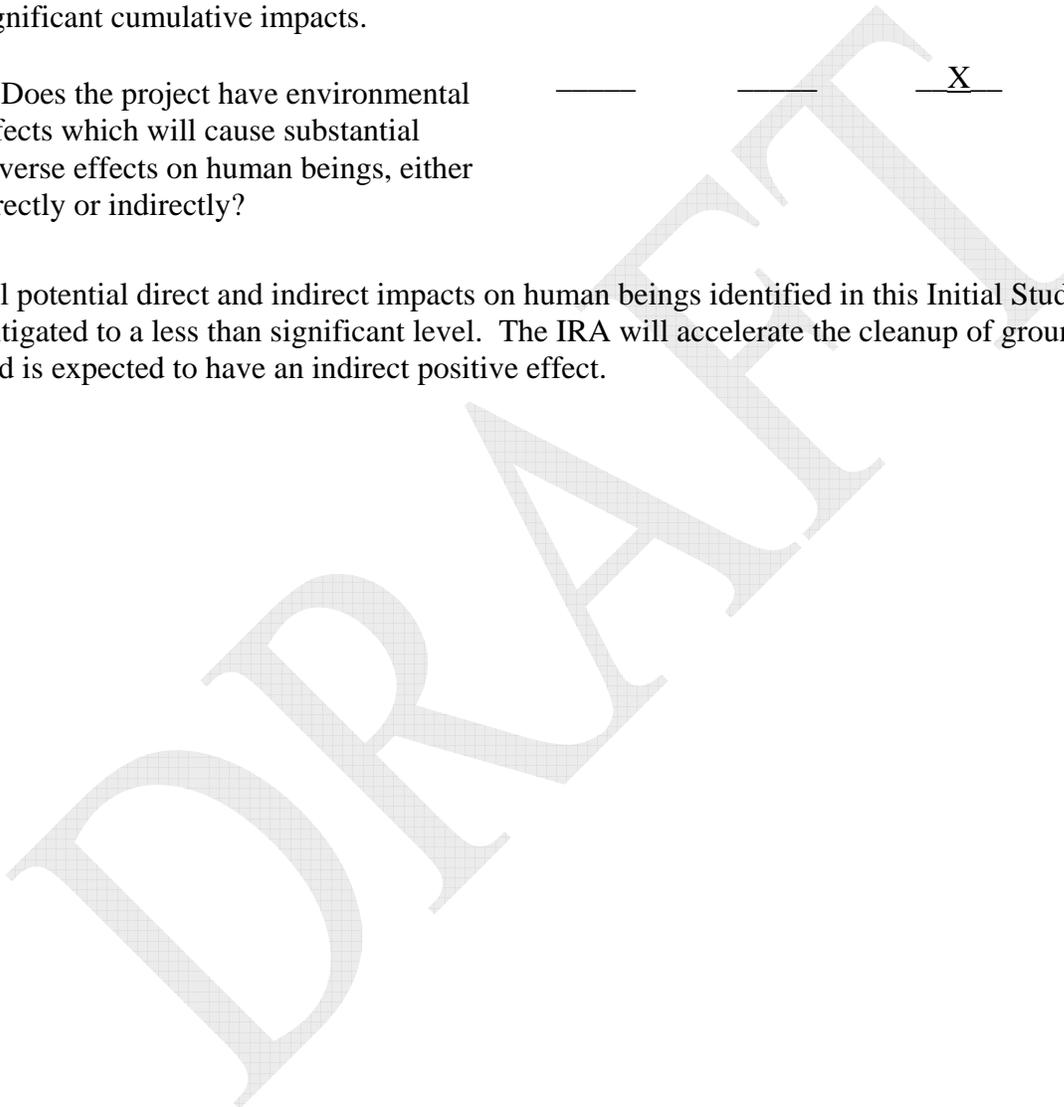
Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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The injection of molasses, when viewed along with the other site activities, including past molasses injections and other past soil and groundwater remedial activities, generates no significant cumulative impacts.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

_____	_____	_____ <u>X</u> _____	_____
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All potential direct and indirect impacts on human beings identified in this Initial Study are mitigated to a less than significant level. The IRA will accelerate the cleanup of groundwater and is expected to have an indirect positive effect.



LIST OF REFERENCES

1. Regional Water Board staff evaluation based on review of the project site and project description
2. Mendocino County Assessors Parcel Map
3. Telephone Communication with Mendocino County Air Pollution Control District, December 31, 2007
4. Draft Regional Water Board Monitoring and Reporting Program No. R1-2008-009
5. Telephone Communication, City of Willits, January 3, 2008
6. Regional Water Board staff evaluation of impact based on past experience
7. Final Remedial Investigation Report, Former Remco Hydraulics Facility, Volumes 1 through 5, dated April 2002
8. Special Publication 42, Fault-Rupture Hazard Zones in California, Alquist-Priolo Earthquake Fault Zoning Act with Index to Earthquake Fault Zones Maps, Revised 1997
9. Interim Remedial Action Work Plan for Hexavalent Chromium-Affected Groundwater, dated March 11, 2003; and Addendum to Interim Remedial Action Work Plan for Hexavalent Chromium Affected Groundwater, dated June 18, 2003
10. Final Post-Injection Report on Pilot Study of In-Situ Chromium Reduction, Former Remco Hydraulics Facility, Willits, California, dated October 31, 2001
11. U.S. Department of the Interior, Geological Survey, Willits Quadrangle, 7.5 Minute, 1991
12. Draft Waste Discharge Requirements Order No. R1-2008-0009
13. Preliminary Removal Site Evaluation Report, Remco Hydraulics, Inc., Site, January 15, 1998
14. FEMA Flood Insurance Map, Community Panel #060187-0001C
15. City of Willits Noise Ordinance
16. City of Willits, Waste Discharge Requirements Order No. R1-2001-17, NPDES Permit No. CA0023060

17. Telephone Communication, Willits Environmental Remediation Trust, December 18, 2008
18. Regional Water Board Files, Abex Corporation, Former Remco Hydraulics Site File Record, Volumes 1 through 52
19. California Government Code Section 65962.5
20. Department of Toxic Substances Control, Site Cleanup – Site Mitigation and Brownfield Reuse Program Database and State Water Resources Control Board Cortese List
21. California Environmental Quality Act, Cultural Resources Section 15064.5
22. Cleanup and Abatement Order No. 99-55
23. Interim Remedial Action Workplan for In-Situ Treatment of VOCs in Shallow Groundwater, November 2007
24. Waste Discharge Requirements Order No. R1-200-54, In-Situ Pilot Study for the chemical Reduction of Chromium
25. Waste Discharge Requirements Order No. R1-2003-085, In-Situ Chromium Soil and Groundwater Treatment