



# California Regional Water Quality Control Board

## Los Angeles Region



Linda S. Adams  
Cal/EPA Secretary

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Arnold Schwarzenegger  
Governor

October 20, 2008

Dr. Franklyn Legall  
The Gillette Company  
37 A Street  
Needham, MA 02492-9120

**RESOLUTION APPROVING CALIFORNIA ENVIRONMENTAL QUALITY ACT REVIEW OF INSITU THERMAL TREATMENT OF VADOSE ZONE AND SHALLOW GROUNDWATER - FORMER GILLETTE PAPERMATE FACILITY, 1681 26<sup>TH</sup> STREET, SANTA MONICA, CALIFORNIA (CAO NO. R4-2008-0034, FILE NO. 97-176, SLIC NO. 130E, SITE ID NO. 2043C00)**

Dear Dr. Legall:

Pursuant to the California Environmental Quality Act, this Regional Board, at a public hearing held on October 2, 2008, reviewed the tentative resolution, considered all factors in the case, and adopted Resolution No. R08-010 (copy attached) approving the environmental checklist and adopting a mitigated negative declaration for remediation of volatile organic compounds in vadose zone soil and shallow groundwater.

**If you have any questions regarding this resolution please contact Mr. Peter Raftery at (213) 576-6724 or Ms. Su Han at (213) 576-6735.**

Sincerely,

*fw* *David A. Bachorowski, AED*  
Tracy J. Egoscue  
Executive Officer

Enclosure: Board Resolution No. R08-010

cc: See Mailing List next page

**California Environmental Protection Agency**



*Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.*

Mailing List

John D. Ambrosio, Red Bull North America, Inc.  
Eddie Arslanian, P.E. (for Hines)  
Lisette Bauersachs, City of Santa Monica  
Nancy Beresky, PG, CEM (for Red Bull North America, Inc.)  
David G. Dundas, Esq. (for the Higgins Trusts)  
James Farrow, Komex  
Zachary Feingold, Verizon  
Octavio Fernandez, MTV  
Andrew Gray, City of Santa Monica  
Martin Hamann (for 1655 Property LLC)  
Stephen Johnson, LECG  
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Marc L. Luzatto, The Luzzotto Company  
Douglas H. Metzler (for Hines)  
Robert Scott, Boeing Company  
Pat Sheehan, GZA GeoEnvironmental, Inc.  
Bruce Smiley, Esq. (for 1655 Property LLC)  
Craig Stewart, Geomatrix Consultants, Inc.

STATE OF CALIFORNIA  
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION

RESOLUTION NO. R08-010

APPROVING THE ENVIRONMENTAL CHECKLIST AND  
ADOPTING A MITIGATED NEGATIVE DECLARATION FOR  
REMEDICATION OF VOLATILE ORGANIC COMPOUNDS IN  
VADOSE ZONE SOIL AND SHALLOW GROUNDWATER BY  
IN-SITU THERMAL TREATMENT, FORMER PAPER MATE FACILITY  
SANTA MONICA, CALIFORNIA  
(FILE NO. 97-176)

**WHEREAS, the California Regional Water Quality Control Board, Los Angeles Region finds that:**

1. Gillette (Responsible Party), as the sole owner of Paper Mate<sup>®</sup>, intends to employ the remediation technology known as In Situ Thermal Treatment (ISTT) to remove volatile organic compounds (VOCs) contamination from vadose (not groundwater saturated) zone soil and the shallow groundwater immediately underlying it. This remediation technology will use electricity to heat soil and groundwater and drive off VOCs. The VOCs vapor will be collected by a vapor extraction system. Wells with heating elements and wells for vapor extraction will be installed.
2. The site operated as Paper Mate<sup>®</sup> from 1957 until 2006. Paper Mate<sup>®</sup> manufactured a variety of writing instruments and many of the components for those instruments. Manufacturing processes included machining, electroplating, metal processing, degreasing, injection molding, and ink manufacturing. Machining included the manufacturing of pen parts from tungsten carbide balls, and brass and stainless steel rods. Chemicals used in machining included cutting oils, hydraulic fluids and lubricants. Electroplating consisted of chromium and nickel plating of metal parts. Plating chemicals included nickel chloride solution, nickel sulfide solution, chromates, acids, and bases. Metal processing included electroless nickel plating of parts. Chemicals used for electroless nickel plating included nickel sulfide solution, nickel chloride solution, acids, bases, paint thinner, lubricants, and methanol. Chemicals used in the molding process included hydraulic oils, lubricants, grease, coolants, antifreeze, adhesives, primers, and paints.
3. The former Paper Mate<sup>®</sup> facility is on 10.5 acres of land immediately north of Olympic Blvd. between Stewart Street on the east and 26<sup>th</sup> Street to the west in Santa Monica. This area is designated as an Industrial Corridor by the City of Santa Monica. There are four main buildings (Building I through IV) covering approximately 295,000 square feet. The buildings are on two adjacent properties (Figure 2). The northern property is currently owned by the Higgins Trusts (Higgins) and the southern property is currently owned by Hines 26<sup>th</sup> Street LLC (Hines). Buildings I, III, and IV are on the Hines property and Building II is on the Higgins property. Prior to 2007, the Hines property was owned by the Stahl Trust (Stahl). Only areas beneath Buildings I and III are the subject to this remediation project.
4. Paper Mate<sup>®</sup> used, stored, and/or treated hazardous materials and waste during their routine operations. Hazardous substances included hydrocarbon fuels, chlorinated solvents, acids, caustics, and other materials. It is believed that the release of hazardous substances to the environment occurred during routine operations.

5. Soil and groundwater beneath the site are contaminated with perchloroethene (PCE), trichloroethene (TCE), other volatile organic compounds at lower concentrations, and in small, localized areas, metals.
6. When measured in 2008 the depth to first groundwater ranged from approximately 34 to 55 feet below ground surface (bgs) in Quaternary alluvium. The alluvium is primarily silt and sandy silt, with sand zones. Groundwater beneath the site is unconfined and the direction of flow varies across the site but is generally toward the southwest. The groundwater depth varies seasonally. There are three City of Santa Monica water supply wells near the site. Well SM-7 is immediately south of the east end of the Site, well SM-4 is approximately 750 feet east of the Site, and well SM-3 is approximately 1600 feet east of the Site. Volatile organic compounds including PCE and TCE have been detected in these City of Santa Monica water supply wells.
7. Because of the controlled nature of this project and the availability of monitoring well data during ISTT operation, there is no potential for this pilot test to adversely affect water quality and water supply wells.
8. Additional information on the proposed ISTT is included in September 22, 2006 *Engineering Evaluation/Cost Analysis Report*, prepared Geomatrix, and the November 5, 2007 letter with the subject *ISTT Remedial Goals*. The November 2007 document was conditionally approved by the Regional Board in a letter dated December 11, 2007.
9. The application of heat in conjunction with the operation of a vapor extraction system to the vadose zone soil and shallow groundwater will not have long-term adverse impacts to groundwater quality, and will not adversely impact any existing or prospective uses of groundwater.
10. The Water Quality Control Plan (Basin Plan) for the Los Angeles Region designates the beneficial uses of groundwater in the Santa Monica Basin for municipal and domestic supply, industrial process supply, industrial service supply, and agricultural supply.
11. During ISTT construction there will be noise and vibration associated with drilling, excavation, and utility construction operations. Ambient noise is expected to increase as a result of the operating process equipment. Noise will be closely monitored in compliance with City of Santa Monica noise ordinances. Noise abatement will be conducted if allowable noise levels are exceeded.
12. The planned remediation activity is consistent with the anti-degradation provisions of State Water Resources Control Board Resolution No. 68-16 (Anti-degradation Policy). The discharge may result in temporary and insignificant exceedance of background concentrations of total dissolved solids (TDS), but this is not anticipated to result in any long-term groundwater degradation.

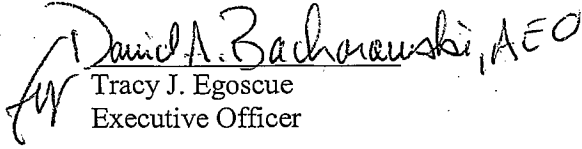
13. The Regional Board has notified the Responsible Party and interested agencies and persons of its intent to review this remediation project under the California Environmental Quality Act and has provided them with an opportunity to submit their written views and recommendations. The Regional Board, in a public meeting on October 2, 2008, heard and considered all comments pertaining to the remedial action.
14. This Regional Board has assumed lead agency role only for review of this remediation project under the California Environmental Quality Act (Public Resources Code section 21000 et seq.) and has conducted an Initial Study (in the format of an expanded Environmental Checklist) in accordance with Title 14, California Code of Regulations, section 15063, titled Guidelines for Implementation of the California Environmental Quality Act. Based on the Initial Study, Regional Board staff prepared a Negative Declaration documenting that the project will not have a significant adverse effect on the environment.
15. Copies of the Environmental Checklist and proposed Negative Declaration were transmitted to the State Clearinghouse, all agencies and interested parties. All comments received have been addressed by Regional Board staff. The Regional Board considered all testimony and evidence at a public hearing held on October 2, 2008, at the Metropolitan Water District of Southern California (Board Room), 700 North Alameda Street, Los Angeles, California, and good cause was found to approve the Environmental Checklist and adopt a Mitigated Negative Declaration.
16. The Regional Board has reviewed the Initial Study and Negative Declaration concerning this Resolution prepared by staff in compliance with the California Environmental Quality Act (Public Resources Code section 21000 et seq.). The Regional Board concurs with the staff findings that a Negative Declaration should be adopted. The Initial Study and Negative Declaration were circulated for public review and comment.

THEREFORE, BE IT RESOLVED that the Regional Board:

1. Adopts the Environmental Checklist, Initial Study and Negative Declaration and directs the Executive Officer to file a Notice of Determination with the State Clearinghouse within 30 days as required by the California Code of Regulations.
2. Directs that a copy of this Resolution shall be forwarded to the State Water Resources Control Board and all interested parties.

CERTIFICATION

I, Tracy J. Egoscue, Executive Officer, do hereby certify that the foregoing is a full, true and correct copy of a Resolution adopted by the California Regional Water Quality Control Board, Los Angeles Region on October 2, 2008.

  
Tracy J. Egoscue  
Executive Officer