

California Regional Water Quality Control Board
North Coast Region

RESOLUTION NO. R1-2007-0005

APPROVING THE INITIAL STUDY/CHECKLIST AND
ADOPTING A NEGATIVE DECLARATION
FOR
IN-SITU TREATMENT OF CONTAMINATED SOIL

ECODYNE CORPORATION
930 Shiloh Road
Windsor, CA

Sonoma County

WHEREAS, the California Regional Water Quality Control Board, North Coast Region, (hereinafter the Regional Water Board) finds that:

1. California Water Code section 13260, subdivision (a)(1) requires that any person discharging wastes, or proposing to discharge wastes other than into a community wastewater collection system, which could affect the quality of waters of the State, shall file a report of waste discharge (ROWD) with the Regional Water Board exercising jurisdiction in the area, and that the Regional Water Board shall then prescribe requirements for the discharge or proposed discharge of wastes.
2. The Ecodyne Corporation (hereinafter the "Discharger") submitted a ROWD to the Regional Water Board on August 23, 2006, for in-situ treatment of hexavalent chromium in soil and groundwater at the former Ecodyne Property at 930 Shiloh Road in Windsor, California. The scope of work to perform the treatment was detailed in a Work Plan submitted to the Regional Water Board on November 21, 2006.
3. The Discharger proposes to inject calcium polysulfide using a direct push drilling rig, which will drive rods to 20 feet below the ground surface. Based on bench scale laboratory testing, 100 gallons of calcium polysulfide will be injected between 10 and 20 feet below ground surface in each boring. Following chemical injection, approximately 300 gallons of water will be injected into the interval to aid in dispersion of the reductant. Following completion of the treatment, each boring will be grouted with cement slurry to grade.
4. Calcium polysulfide is a reductant that will react with the hexavalent chromium, reducing the hexavalent chromium to trivalent chromium. Trivalent chromium is essentially insoluble and non-toxic at the projected concentrations. Bench scale testing showed that arsenic and copper that is naturally present in soil can be locally mobilized by the reducing conditions created by this process. However,

- outside of the treatment area, these conditions do not persist and the metals would cease to be mobilized.
5. Locally, groundwater will be affected by excess calcium polysulfide. This residual reductant will locally raise the calcium and sulfide content of the groundwater and may temporarily impart a taste and odor of calcium polysulfide. Previous treatment events have shown that metals such as arsenic and copper are not mobilized at this site.
 6. The permitted discharge is consistent with the anti-degradation provisions of State Water Resources Control Board Resolution No. 68-16 (Anti-degradation Policy).
 7. The Regional Water Board has notified the Dischargers and interested agencies and persons of its intent to prescribe Waste Discharge Requirements for this discharge and has provided them with an opportunity to submit their written comments and recommendations. The Regional Water Board, in a public meeting on February 7, 2006, heard and considered all comments pertaining to the discharge and to the tentative Waste Discharge Requirements.
 8. The Regional Water Board has assumed lead agency role for this project under the California Environmental Quality Act (Pub. Resources Code, section 21000 et seq.) (CEQA) and has prepared an Initial Study/Checklist in accordance with title 14, California Code of Regulations, section 15063. Based on the Initial Study/Checklist, Regional Water Board staff prepared a Negative Declaration determining that the project would not have a significant adverse effect on the environment.
 9. Copies of the Initial Study/Checklist and proposed Negative Declaration were transmitted to the State Clearinghouse, all agencies, and interested parties.
 10. The Regional Water Board has received the Initial Study/Checklist and Negative Declaration concerning this Resolution prepared by staff, in compliance with CEQA. The Initial Study/Checklist and Negative Declaration were circulated for public review and comment. The Negative Declaration reflects the Regional Water Board's independent judgment and analysis.
 11. All substantive comments received have been addressed by Regional Water Board staff. The Regional Water Board considered the Initial Study/Checklist and Negative Declaration, and all testimony and evidence at a public hearing held on February 7, 2007 at the David C. Joseph Hearing Room located at the Regional Water Board office, 5550 Skylane Boulevard, Suite A, Santa Rosa, California. The Regional Water Board finds that, after consideration of the written and oral comments, staff's professional review and advice, and the Negative Declaration, there is no evidence in the record to support a fair argument that there may be adverse environmental impacts resulting from the proposed project.

THEREFORE, BE IT RESOLVED that the Regional Water Board:

1. Adopts the Initial Study/Checklist and Negative Declaration and directs the Executive Officer to file a Notice of Determination with the State Clearinghouse within 30 days in accordance with title 14, California Code of Regulations, section 15075.

Certification

I, Catherine E. Kuhlman, 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, North Coast Region, on February 7, 2007.

Catherine E. Kuhlman
Executive Officer