



**Health & Human Services
Agency
COUNTY OF TULARE
AGENDA ITEM**

BOARD OF SUPERVISORS

KUYLER CROCKER
District One
PETE VANDER POEL
District Two
AMY SHUKLIAN
District Three
EDDIE VALERO
District Four
DENNIS TOWNSEND
District Five

AGENDA DATE: June 2, 2020 REVISED

Public Hearing Required	Yes <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Scheduled Public Hearing w/Clerk	Yes <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Published Notice Required	Yes <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Advertised Published Notice	Yes <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Meet & Confer Required	Yes <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Electronic file(s) has been sent	Yes <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
Budget Transfer (Aud 308) attached	Yes <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Personnel Resolution attached	Yes <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Agreements are attached and signature line for Chairman is marked with tab(s)/flag(s)	Yes <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
CONTACT PERSON: Karen M. Elliott PHONE 624-8480		

SUBJECT: Approve a Land Use Covenant and Agreement with the Department of Toxic Substances Control

REQUEST(S):
That the Board of Supervisors:

1. Approve a Land Use Covenant and Agreement with the Department of Toxic Substances Control to allow for restricted use of county owned property, effective June 2, 2020. There is no money associated with this agreement.
2. Authorize the Chair of the Board to sign three (3) copies of the agreement.

SUMMARY:
The Environmental Quality (EQ) program operates out of the Tulare County Health and Human Services Agency (HHSA) to assist county agencies and departments comply with Federal, State and County regulations. The EQ program assists county agencies and programs manage hazardous materials and waste. Additionally, the EQ program investigates, assesses, and remediates contaminated properties, and monitors County-owned public water supplies and landfills' groundwater contamination. One of the hazardous waste sites the Environmental Quality program monitors is Harmon Field.

Harmon Field, approximately 65 acres, is a County owned former general aviation airport located at 1494 South Airport Road in Pixley, CA. The airfield began operations in 1951 and was primarily used for crop dusting applications until it closed in 1994. The chemicals of concern at the site are primarily organochlorine pesticides and toxaphene that were released by crop dusting operations at the airfield. A Remedial Action Order was issued to the County in 1989 by the

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DATE: June 2, 2020

Department of Toxic Substances Control (DTSC) that required the County to remediate the contamination. Remediation activities were concluded in 2015.

Pursuant to Civil Code section 1471, the DTSC has determined that this covenant and agreement is necessary because of the presence of hazardous materials as defined in the Health and Safety Code section 25360, to protect the environment and the health and safety of county residents and the environment.

The property has been investigated and remediated under DTSC's oversight. Remediation activities included the excavation of impacted soil and oiled sand, thermal treatment of removed impacted soil, backfilling of excavated areas using the treated soil and placement of oiled sand and impacted concrete debris in an earthen vault. Protective measures were taken to protect the vault from environmental and biological factors. Hazardous substances remain at the property above levels of acceptable or unrestricted land use.

As a result of the presence of hazardous substances, DTSC has concluded that it is reasonably necessary to restrict the use of the property. The property cannot be used without prior written approval from DTSC for a residence, a hospital for humans, schools, or day care. The department has further concluded that the Property, as remediated and when used in compliance with the Environmental Restrictions of this covenant, does not present an unacceptable risk to the health and safety of residents or the environment.

The following term deviates substantively from standard County boilerplate: The County must sign first.

FISCAL IMPACT/FINANCING:

The costs associated with this agreement include soil management plan reviews completed by the Department of Toxic Substance Control. The cost of the review is based on the actual time spent on each project and review. As this is a County property, the Tulare County General Services Agency will cover the costs associated with these services. There is no additional cost to the County General Fund.

LINKAGE TO THE COUNTY OF TULARE STRATEGIC BUSINESS PLAN:

The County's five-year strategic plan includes the Quality of Life. This agreement furthers the Quality of Life Initiative which promotes public health and welfare. This agreement supports this initiative by providing guidance and information related to the restrictions for the use of this property.

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Toxic Substances Control

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ADMINISTRATIVE SIGN-OFF:

/s/Robert Stewart OBO

Karen M. Elliott

Director of Public Health

cc: County Administrative Office

Attachment(s) Land Use Covenant and Agreement
Environmental Property Management Plan

**BEFORE THE BOARD OF SUPERVISORS
COUNTY OF TULARE, STATE OF CALIFORNIA**

IN THE MATTER OF APPROVE A LAND) Resolution No. _____
USE COVENANT AND AGREEMENT WITH) Agreement No. _____
THE DEPARTMENT OF TOXIC)
SUBSTANCES CONTROL)

UPON MOTION OF SUPERVISOR _____, SECONDED BY
SUPERVISOR _____, THE FOLLOWING WAS ADOPTED BY THE
BOARD OF SUPERVISORS, AT AN OFFICIAL MEETING HELD _____
_____, BY THE FOLLOWING VOTE:

AYES:
NOES:
ABSTAIN:
ABSENT:

ATTEST: JASON T. BRITT
COUNTY ADMINISTRATIVE OFFICER/
CLERK, BOARD OF SUPERVISORS

BY: _____
Deputy Clerk

* * * * *

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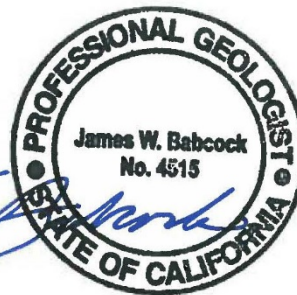
County of Tulare

Environmental Quality Division • 5953 South Mooney Boulevard • Visalia, CA 93277

FINAL

Environmental Property Management Plan – Parcel 2

Harmon Field Site
Pixley, California



December 5, 2019



Report Prepared By:

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Figure 2: Parcel 2 with Parcel 1 Access Route

Exhibits

Exhibit 1: Parcel Record Map (two sheets)

Attachments

Attachment 1: Land Use Covenant and Agreement (LUC) for Parcel 1 and Parcel 2
(when available from DTSC)



Acronyms and Abbreviations

APN	Assessor Parcel Number
bgs	Below ground surface
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
DDD	1,1-Dichloro-2,2-bis(p-chlorophenyl)ethane
DDE	1,1-Dichloro-2,2-bis(p-chlorophenyl)ethylene
DDT	1,1,1-Trichloro-2,2-bis(p-chlorophenyl)ethane
ΣDDT	Sum of DDD, DDE and DDT
Dinoseb	2-sec-butyl-4,6-dinitrophenol (also known as DNBP)
DNBP	2-sec-butyl-4,6-dinitrophenol (also known as Dinoseb)
DTSC	Department of Toxic Substances Control
EPMP	Environmental Property Management Plan
EQD	Tulare County Health & Human Services Agency, Environmental Quality Division
GCL	Geosynthetic Clay Liner
GOR	Geologist of Record
HHSA	Tulare County Health & Human Services Agency
LUC	Land Use Covenant
LTTD	Low Temperature Thermal Desorption
mg/kg	Milligrams per kilogram
O&M	Operation & Maintenance
OSHA	Occupational Safety and Health Administration
PE	Professional Engineer, State of California
PG	Professional Geologist, State of California
PID	Pixley Irrigation District
PPUD	Pixley Public Utility District
RACR	Remedial Action Completion Report
RAO	Remedial Action Order
RAP	Remedial Action Plan
RDIP	Remedial Design Implementation Plan
RWQCB	Regional Water Quality Control Board
SMP	Soils Management Plan
USEPA	United States Environmental Protection Agency



1. Introduction

1.1. Goals and Redevelopment Guidance

Harmon Field – Parcel 2 is a former contaminated property that has been properly and safely cleaned up to commercial / industrial cleanup levels. Tulare County in planning for the successful use of Parcel 2 may require an early assessment of how the Parcel will be marketed for redevelopment. In recognition that the more intrusive the land use, the more likely the redevelopment will be hindered by complying with California and Tulare County regulatory and environmental planning documents including soil sampling, regulatory reporting and unanticipated remediation removal actions. These additional actions will increase project schedules and costs. Tulare County cannot assure prospective developers of timely action by County oversight teams nor of reasonable oversight timelines from California regulatory agencies. Minimally intrusive redevelopment projects can anticipate fewer project delays.

Detailed pre-site development planning can minimize time delays and remediation cost. Harmon Field is a Brownfield as defined by the federal government in the Small Business Liability, Relief and Brownfields Revitalization Act of January 11, 2002, as any real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant.

The Harmon Field redevelopment zoning options were chosen by Tulare County during the site remediation process when the County chose a commercial / industrial cleanup standard to limit the remediation cost, thus limiting future development to commercial / industrial zoning.

County staff can improve the marketability of Parcel 2 by anticipating the general infrastructure needs of the Parcel 2 redevelopment including potable- and fire- water, and sewer services. Pre-planning for Parcel 2 infrastructure can use the adjacent Parcel 3 to eliminate or minimize regulatory oversight because Parcel 3 has no Brownfield restrictions because it was not part of the original contaminated property. Using Parcel 3 for higher impact infrastructure and using Parcel 2 for minimal intrusive infrastructure has the potential to fast-track development of both Parcels 2 and 3.

1.2. Purpose

The purpose of the Environmental Property Management Plan for Parcel 2 (EPMP) is to provide a cost-effective approach to streamline the regulatory compliance for management of Parcel 2 required by the California Department of Toxic Substances Control (DTSC) in their long-term oversight of the former hazardous waste site. DTSC is preparing a Land Use Covenant and Agreement (LUC) for Parcel 1 and Parcel 2 to augment the Parcel 1 Operations and



Management (O&M) Plan (Babcock, 2019). This EPMP is intended to be an attachment to the LUC (DTSC, 2020).

Tulare County does not intend on selling Parcel 2 however they may lease all or a portion of Parcel 2. The EPMP will serve to guide Tulare County staff and potential lessees in adhering to the regulatory restricts governing the use of Parcel 2. The EPMP will assist them in understanding the time commitments and costs, including sampling costs, which could impact their future planning for Parcel 2 as they submit possible plans, specifications, sampling plans, and investigation reports for their anticipated uses of the Parcel to Environmental Quality Division (EQD) for review and forwarding to DTSC.

1.3. Introduction and Background

Harmon Field is located at 1494 South Airport Road on the west side of the town of Pixley in Tulare County, California (Figure 1). Harmon Field is owned by Tulare County and occupies approximately 100 acres; however, the remediation area within the property is approximately 66 acres. The proposed Operation & Maintenance area is the approximately 1 acre Parcel 1 vault (Parcel 1) located at the south end of Harmon Field.

The airfield began operations in December 1951 and was primarily used for crop dusting operations until it closed in early 1994. Four fixed-base operators are known to have held leases at the airfield: Meek Dusters, Earlimart Dusters, Pixley Dusters, Inc., and Tulare Mosquito Abatement District.

The chemicals of concern are primarily organochlorine pesticides, in particular the sum of 1,1,1-Trichloro-2,2-bis(p-chlorophenyl)ethane (DDT), 1,1-Dichloro-2,2-bis(p-chlorophenyl)ethane (DDD), and 1,1-Dichloro-2,2-bis(p-chlorophenyl)ethylene (DDE) where the sum of the concentrations of DDT, DDD, and DDE is collectively identified as Σ DDT, and toxaphene released by crop dusting operations at the airfield.

The California Department of Toxic Substances Control (DTSC) issued Remedial Action Order (RAO), Docket Number HAS 88/89-020, dated March 13, 1989 (DTSC, 1989) and an Amended RAO dated June 20, 1991 (DTSC, 1991). The RAO and the RAO Amendment required Tulare County to remediate the contamination.

The Final Remedial Action Plan [(RAP), 2010], as the decision document, identified toxaphene and Σ DDT as the indicator parameters. The cleanup levels are:

- 10 milligrams per kilogram (mg/kg) for toxaphene, and
- 70 mg/kg for Σ DDT

The cleanup levels apply to contaminated soils, based on a risk level of 10^{-5} . These cleanup levels are fully protective of human health and the environment for the continued commercial /industrial land use of the remediated property.

The RAP selected thermal desorption as the final remedy. The RAP described the remediation including construction of an earthen vault, referred to as the Parcel 1 vault, for contaminated oiled



sand and concrete, removal of oiled sands from the taxiways, connectors, and aprons, partial removal of oiled sands from the runway, containment of impacted oiled sand and debris in the Parcel 1 vault, and excavation and treatment of pesticide-impacted soils using a low temperature thermal desorption (LTTD) treatment process to address organochlorine pesticide contamination.

DTSC required and approved a Remedial Design and Implementation Plan (RDIP; 2012) that provided specific details on the implementation of the RAP. The RDIP primarily was implemented from May through December 2014 with minor cleanup and restoration completed in September 2015.

Concentrations of 2-sec-butyl-4,6-dinitrophenol (DNBP or Dinoseb), a compound in the dinitrophenol pesticide family, were discovered ranging from 1.3 to 1,100 mg/kg. The primary targets of the remediation project, toxaphene and Σ DDT, were not detected or were present at concentrations below the cleanup goals. Based on a review of historical data, previous DNBP detections were co-located with toxaphene or Σ DDT. Therefore, DNBP-impacted soil was not included in the original cleanup project. DNBP was used as a pre-emergent herbicide prior to 1986, when the sale of DNBP was banned by the United States Environmental Protection Agency (USEPA).

The County prepared an addendum to the RDIP that delineated the visual extent of yellow-stained soil, and proposed a cleanup goal of 61 mg/kg to meet the overall, commercial/industrial cumulative risk target that was approved in the RAP. The RDIP Addendum was approved by DTSC.

In a DTSC memo the DNBP cleanup level was approved:

- DNBP – 61 mg/kg

In September 2015, the post-remediation O&M was initiated by Tulare County Health & Human Services Agency (HHSA) EQD staff.

There are no existing wells at Harmon Field. The historic temporary groundwater monitoring wells TW-1, TW-2, and TW-3 located in Parcel 2 were abandoned in May 2011. A well abandonment report was submitted on July 18, 2011. Water is supplied by Pixley Public Utility District (PPUD) from a water line coming into the Parcel through the road yard from Airport Road (Road 120).

1.4. Pre-remediation Facility Infrastructure Removal Activities

The airfield was closed in early 1994 because of concern from DTSC and Tulare County about continued poor operating practices of the crop dusting operators. After closure of the airfield, the site had a multitude of above ground and underground airfield infrastructure that if it remained in place would complicate site remediation activities. Therefore, Tulare County EQD initiated a program to remove the infrastructure to simplify and streamline the future remediation contracting and reduce its cost. The site had underground storage tanks and sumps, septic systems, and two aircraft hangars, and associated office buildings.



1.4.1. Underground Storage Tank and Sump Abandonment

Tulare County EQD designed a removal work plan for the underground fuel storage tanks and pesticide sumps left in the operations areas after the aerial applicators vacated the airfield (Tulare County, 1995). EQD identified the following Underground storage tanks (USTs) and sumps at the site with tank designations A (Earlimart Dusters and B (Pixley Dusters):

- Tank A-1 One 2,500 gallon regular gas fuel tank
- Tank A-2 One 1000 gallon regular gas fuel tank
- Tank A-3 One 1,000 gallon aviation gas fuel tank
- Tank A-4 One 550 gallon aviation gas fuel tank
- Tank B-1 One 12,000 gallon aviation gas fuel tank
- Four concrete lined pesticide rinse and mixing/loading water sumps

The fuel tanks and pesticide sumps were removed and surrounding soils remediated in some cases with excavations as deep as eight feet for fuel tanks, and pesticide sumps excavations as deep as nine feet below surface grade (Tulare County, 1997).

In addition to properly abandoning or removing these tanks and sumps, the EQD program had the associated piping and fuel dispensers removed as well. The field activities associated with this remediation were conducted in May and June of 1995 (Tulare County, 1997).

1.4.2. Pixley Dusters Aircraft Hangar

The Pixley Dusters, Inc. aircraft hangar, the southernmost hanger, had associated with it an office building, storage sheds, and a septic system.

1.4.3. Earlimart Dusters, Inc. Aircraft Hangar

Earlimart Dusters, Inc. aircraft hangar, the northernmost hanger, had an associated septic system. On March 27 and 28, 2007, the Earlimart Dusters airplane hangar structure was demolished by Petrosius Construction, Inc., of Visalia, California. During demolition, the hangar construction materials were kept wet for dust control, segregated by hand, and the metal and wood waste piles were loaded and hauled for recycling. Approximately 20 cubic yards of non-recyclable waste was hauled to a County landfill for disposal. Once the hangar demolition project was complete, the removal was confirmed by the Tulare County Building Department. A copy of the County Building Department Permit, and the California Air Resources Board (CARB) asbestos removal certification were previously submitted to DTSC. Asbestos floor tile was removed from the hangar office and disposed by PARC Environmental, Inc., of Fresno, on October 9, 2006.

In January of 2011, removal of the uncontaminated concrete foundation and other building foundations were completed, however this pre-remediation activity was not included in the Final Remedial Action Reports (ARCADIS, 2015a, 2015b). The contaminated concrete foundation was left in place for future placement in the on-site vault.



1.5. Post-Remediation Harmon Field Parcels

The original 104-acre parcel was Assessor Parcel Number (APN) 314-080-026 has been divided into multiple parcels. Hazardous waste historically was located within Parcel 2 now identified as the remediated airfield area. During remediation of Parcel 2, some hazardous waste was placed in the Parcel 1 Vault. Figure 2 shows the parcels that were part of the original 104 acres and the location of Parcel 1. Figure 3 shows Parcel 1 in more detail.

The site includes:

- Parcel 1 the hazardous waste vault,
- Parcel 2 the remediated airfield area,
- Parcel 3 the County Road Yard and a borrow pit area adjacent to the Road Yard, part of which is used as a stormwater retention basin, and County right-of-way along West Terra Bella Road,
- Parcel 4 the Pixley Irrigation District Canals and County right-of-way along South Airport Road.

1.5.1. Parcel 1 Vault Enclosure

The Parcel 1 Vault was constructed in an uncontaminated area along the south boundary of the original Harmon Field parcel. The enclosure is a 1.07 acre parcel. It is fenced and locked. Access restrictions apply to this commercial / industrial zoned parcel.

1.5.2. Parcel 2 - Remediated Airfield Area

The remediated airfield area as documented in the certification report (ARCADIS, 2015) will be utilized as a Brownfield site with its on-going zoning as commercial / industrial to comply with the commercial / industrial cleanup goals in the RAP. There is no specific development proposed for the remediated airfield area however there is a dedicated easement to assure access to the Parcel 1 Vault for routine maintenance and access by PPUD staff to their sanitary sewer line that transits the site north of the Parcel 1 Vault. The remediated airfield area is a 63.88 acre parcel containing the former pesticide contaminated soils, asphaltic runway and aprons that were properly remediated to commercial / industrial cleanup levels. The remaining asphalt / oil sand is not considered hazardous waste.

No access restrictions apply to this commercial / industrial zoned parcel.

1.5.3. Parcel 3 - Road Yard and Borrow Pit Area

The Road Yard and Borrow Pit Area, is an approximately 30 acre parcel encompassing the remaining area of the original 104 acre parcel except for a small parcel incorporating the Pixley Irrigation District (PID) canals on the east and south sides of the original parcel. It is the uncontaminated area outside of the former airfield operating area that contains the Road Yard, stormwater retention basin, and other former borrow areas northeast of the former airfield. It is a commercial / industrial zoned property with no deed restriction because it has never been considered part of the 30.7 acre hazardous waste area as defined in the Remedial Action Order (DTSC, 1989).



1.5.4. Parcel 4 - Pixley Irrigation District Canals and County Right-of-Way

The PID canals on the east and south sides of the original parcel and the County right-of-way along Airport Road comprise an area of about 8.22 acres.



2. Existing Conditions on Parcel 2

The existing conditions for Parcel 2 at the beginning of year 2020 have been governed by the DTSC RAO and the O&M Agreement approved by DTSC (1996). No authorized use of the Harmon Site specifically Parcel 1 and 2 is allowed until the new LUC agreement is recorded.

2.1. Final Remediation Backfill and Grading

Approximately 25,098 tons / 18,300 cubic yards of soil were excavated and thermally treated during the remediation of Parcel 2 (ARCADIS, 2015a). After treatment the clean soil was generally returned to the excavated area and then the entire area of remediation was brought to approximately original final grade. This resulted in the remediated area of Parcel 2 having clean soil placed generally placed at a thickness of one-foot to several feet over the parcel. In some areas of deeper contamination, the clean backfill is from four to ten feet thick with a maximum of about 19 feet in place in and around the former rinse water pond.

2.2. Fencing and Property Signage

The 1996 O&M Agreement required a six-foot high fence surrounding the Harmon Field Site. With approval of the new LUC DTSC (2020 the property control of Parcel 2 and Parcel 3 will revert to the standard Tulare County property control procedures appropriate to the future site development as a commercial / industrial property. The hazardous waste warning signs will be removed around Parcel 2 and Parcel 3. The Parcel 1 hazardous waste signage is in-place and will remain in-place in accordance with the Parcel 1 O&M Plan (Babcock, 2019) and the new LUC (2020). The current barbed wire fence along the north and northeast boundary of Parcel 2 will be removed for ease of development, however the County is installing short segments of chain link fence at parcel 2 survey turning points so that the boundary between Parcel 2 and Parcel 3 is memorialized and there will never be an issue of quickly identifying Parcel 2 property.

2.3. Flooding History – Pixley Irrigation District Canal Failures

Parcel 2 has a PID canal on the east and south side. Maintenance issues especially rodent control has resulted in multiple failures when rodent tunnels impact the structural integrity of the canal banks. Harmon Field has been flooded multiple times with a significant flood event on April 17, 1993 and a more limited event in 2000. Since 2000, EQD staff have overseen increased rodent control on the adjacent County property to augment the PID canal maintenance.

Flood control infrastructure may be complicated because of the potential environmental restrictions or constraints on excavations.



2.4. Off-site Removal of Non-Contaminated Asphalt Runway

Discrete depth sampling of the asphalt from the runway and taxiways was conducted and the analytical results submitted to DTSC (ARCADIS, 2012b). The results indicated that the top three-inch thick layer of the asphalt required remediation by removal and placement in the Parcel 1 on-site vault, however, the bottom of the asphalt runway is not hazardous. ARCADIS (2012b) recommended leaving the remainder in place for later non-hazardous recycling. DTSC (2012) approved allowing the non-hazardous asphalt/oil sand to remain in place under the commercial/industrial deed restriction or be transported off-site for recycling.

Tulare County plans on removing the non-hazardous asphalt runway material for off-site recycling after the new LUC is finalized and recorded. Removal of the non-hazardous asphalt will prepare the site for future development and remove the ongoing visual attraction of the runway to aviators. The County notified the Federal Aviation Administration (FAA) Fresno Flight Standards Office and the California Department of Transportation – Division of Aeronautics (ARCADIS, 2011a) of continued unauthorized landings at the closed airfield.

2.5. On-Site Utilities

2.5.1. Drinking / Fire Suppression Water Supply

Historically, water was supplied by PPUD to the Harmon Field airfield by a water line from Airport Street (Road 120) at the main entrance to the airfield and County Road Yard. During remediation, the water line was shortened and at the present time it extends about 150-feet into Parcel 2 from Parcel 3.

The County intends on shortening the line to near the boundary fence near Parcel 3. The water line will end about 30 feet from Parcel 3 terminating with the relocated backflow preventer and a gate valve on a standpipe. This will continue to supply a source of fire water on Parcel 2.

There has never been groundwater supply wells on the Harmon Field site. DTSC and Tulare County continue to disallow the drilling and installation of water supply wells of any type on the parcels that were part of the original Harmon Field site as a protective health and safety issue.

There were three groundwater monitoring wells required by the Regional Water Quality Control Board (RWQCB) as part of the site investigations. The groundwater monitoring wells were properly abandoned in May 2011 (ARCADIS, 2011b) in preparation for the remediation of the site.

2.5.2. Inactive Underground Piping

Inactive underground water pipes or electrical wire conduit piping were discovered during the final site remediation while excavating in Area 1 in the northern apron. All utilities related to these pipes had been previously decommissioned by Tulare County. Three underground polyvinyl chloride pipes and one steel pipe were discovered at approximately 1 foot below ground surface



(bgs). The underground pipes contained residual amounts of water. The pipe within the excavation area was removed, placed in roll-off bins, and sent to Arlington Landfill in Oregon. Pipe left in place outside the excavation area is shown on Figure 2 of the RACR. These non-contaminated pipes are abandoned in place, however, they may be removed by EQD prior to redevelopment of the parcel to eliminate future confusion about the nature of the piping.

2.5.3. Electricity Utility Service

Electrical power is provided by Southern California Edison with several power poles near the water line. Power has been disconnected at a power pole immediately inside Parcel 2 adjacent to the road yard.

2.5.4. Wastewater Sewer Main

No sanitary sewer service is available on Parcel 2. PPUD has a wastewater treatment plant (WWTP) immediately west of Parcel 2 and the current sewer main for the town of Pixley cross the south end of Parcel 2 from Airport Street to the WWTP. It is a 36-inch diameter clay pipeline with two manholes on Parcel 2 that can access the sewer main that is about 15 feet deep depending on the distance to the WWTP.

When the WWTP upgrades their sewer line capacity, the current line is planned to be abandoned in-place to avoid conducting any unnecessary excavations on Parcel 2. If maintenance or emergency repairs are required EQD must be notified (see Section 3.3).

2.5.5. High Pressure Natural Gas Line

Southern California Gas Company (SoCal Gas), also known by its parent company Sempra Energy, has a high-pressure natural gas line on Terra Bella Road. It is located on the south road right-of-way easement. During remediation the LTTD was powered natural gas from a low-pressure gas line that connected to the high-pressure line about 1,500 feet west of the southwest corner of the intersection of Terra Bella Avenue (Avenue 96) and South Airport Street (Road 120). Parcel 2 is about 230 feet south of the connection point. Contact SoCal Gas for information on the status of the connection and procedures to connect to the high-pressure natural gas line.

2.6. Weed and Rodent Control and Firebreaks

Weed control to prevent or minimize grass fires and to disrupt rodent nesting is conducted on Parcel 2 using disking and potentially plowing as described in the following paragraphs concerning maintenance of fire breaks. The disruption of rodent nesting is important to prevent or minimize the rodent population that can threaten the integrity of the Parcel 1 soil vault as well as the PID soil berms of the irrigation canal on the east and south sides of Parcel 2.

Firebreaks along the perimeter of Parcel 2 have been maintained by disking with a tractor or bulldozer using a 16-inch to 24-inch disk. Occasionally depending upon contractor equipment availability a plow may have been used to turn over the grasses brush to create the firebreaks. The width of the firebreaks range from 12 to 30 feet. The disking occurs several times a year



depending on rainfall and the growth of grasses and brush. The County's vegetation management program is in line with southern California practices (US Forest Service, 1977).

The firebreaks serve several purposes:

- Prevent fire from escaping into areas outside of Parcel 2 and 3,
- Prevent a fire starting along Terra Bella Road from entering the site, the prescribed fire unit. 2.
- Simplify efforts needed to suppress a fire and secure a fireline,
- Provide a safe travel corridor for fire crews around the fire area, and.
- Reduce the spread of weeds.

2.7. Routine Property Maintenance

Tulare County anticipates routine maintenance of the Parcel 1 Vault Enclosure. The routine maintenance and O&M activities will include:

- Fence and gate repairs,
- Weed control,
- Rodent control,
- Refurbishing gravel roadway in Parcel 2 along the access corridor to the Parcel 1 on-site vault area



3. Managing Environmental Restrictions

This section presents cost-effective approaches for Tulare County and potential commercial / industrial lessees to comply with DTSC concerns and restrictions about utilizing the former pesticide contaminated property to prevent potential future exposure to the public that will be using and working on Parcel 2.

3.1. Notice to Potential Site Developers & Designers

Potential future users of Parcel 2 may be County departments or commercial / industrial clients. Not all County departments are aware that the Harmon Field site was a former pesticide contaminated site. Therefore, if a County department expresses interest in using Parcel 2, this section is a mechanism to alert them to the possible issues concerning using the property. Presenting the potential user with a brief one-page summary is one method to forewarn them of environmental and time constraints in using the property.

The County may wish to lease the property to a commercial / industrial user. The County, as lessor, has a responsibility to proactively alert the lessee to the environmental and time constraints in using the property to adhere to DTSC restrictions. This will save both the County and the lessee from spending time and project costs on a property that may not meet the potential project time schedule.

By forewarning potential users of the environmental and time constraints associated with designing a project that may require time consuming negotiations and soil work plans with DTSC may reduce the potential litigation exposure of the County.

3.1.1. Use Site Designs to Minimize Construction Costs

The County (lessor) or firms leasing or intending to lease Parcel 2 (lessees) can use site designs to minimize construction costs by understanding site environmental constraints. Constructing a facility on Parcel 2 will probably be more expensive than constructing it on Parcel 3 that has no environmental constraints by DTSC.

Excavations on Parcel 2 require the preparation and implementation of soil management plans and investigation reports. DTSC and EQD may review all plans and investigation reports thus potentially resulting in project schedule interruptions to receive authorization to sample then delayed authorization to construct while the investigation report is being reviewed. For example, if a solar panel project was being proposed for Parcel 2, using driven supports for the solar panels instead of soil boring or excavations used for deeper support systems could fast track the project.



3.1.2. Site Planning Involvement of Environmental Quality Division

The EQD has been assigned responsibility for environmental oversight of the Harmon Field site since at least 1988 and has an excellent understanding of the history, investigations, remediation and regulatory negotiations and environmental restrictions of the site.

The County requires the involvement of the Coordinator for the Environmental Quality Division, currently Ms. Allison A. Shuklian, in all design and planning of site development on all parcels at Harmon Field including modifications to infrastructure on Parcel 2 and adjoining parcels. At a minimum, EQD needs to be copied on significant meeting announcements and summarizes of conceptual ideas as the development process moves forward. All discussions, either formal or informal, with DTSC are prohibited without the direct involvement of EQD. All submittals to DTSC will be transmitted through EQD. This will assure that the County is aware of any activities that may have an impact on the County's ability to comply with DTSC requirements in the LOC and EPMP for Parcel 1 and 2. This requirement includes County-lead proposed developments or lessee proposed developments.

The involvement of EQD staff shall be initiated in the conceptual planning stage and extent into site preparation including soil disturbance / excavation, construction and final construction completion. Any proposed or additional post-construction projects will immediately re-involve EQD to assure that DTSC is aware of on-going plans or proposed work including soil excavations.

3.1.2.1. Harmon Field Geologist of Record

DTSC has required a Geologist of Record (GOR) for the Harmon Field site. The County selected James W. Babcock as the Geologist of Record for the site by the Board of Supervisor resolution No. 98-0606 on July 7, 1998 to assist EQD with the technical management of hazardous waste issues. Currently, Dr. Babcock remains as the GOR reporting to EQD. EQD may assign the GOR to assist with management of Lessee(s) development, construction or post-construction plans, as needed by EQD staff.

3.1.3. Involvement of County Risk Management and County Counsel

County staff initiated projects for Parcel 2 will require notifications be sent to County Risk Management and County Counsel. Risk Management and County Counsel will alert EQD to the staff initiated projects to make sure that EQD is award of the proposed projects. This will assure that EQD is aware of any activities that may have an impact on the County's ability to comply with DTSC requirements in the LOC and EPMP for Parcel 1 and 2.

When County staff, including the Planning Department, are presented with a Developer proposed project involving Parcel 2, they are required to inform EQD,

3.1.4. Involvement of Environmental Hazardous Waste Consultants

Lessees are required to have a California Professional Geologist (PG) or California Professional Engineer (PE) consultant with California hazardous waste project experience, involved in the



conceptual planning, preliminary and final designs of site development projects. This is to minimize environmental management costs to the County and lessees and attempt to expedite the project.

3.1.4.1. EQD Authority

The environmental consultant must assign staff with California hazardous waste project experience to the site development team. The EQD Coordinator has authority to review resumes of proposed environmental staff and request a change in environmental staff.

3.1.4.2. Knowledge of Parcel 2 Environmental Restrictions

The environmental consulting firm assigned to the project needs to staff the project with technical professionals with a thorough knowledge of the EPMP.

3.2. County Removal of Clean Asphalt Runway

The remaining runway and connectors asphalt and other tested asphalt has been documented as non-hazardous material (ARCADIS, 2012a) and authorized to be transported off-Site for recycling (DTSC, 2012). The soil immediately below the remaining asphalt was tested at the same time and documented to be non-hazardous.

3.3. Wastewater Sewer Main Maintenance and Repairs

Access to the Parcel 2 sewer main by PPUD staff or their contractors / consultants requires notification to EQD prior to entry. No repair work, except emergency response actions, will be conducted without prior notification to EQD. This requirement will assure that EQD is aware of any activities that may have an impact on the County's ability to comply with DTSC requirements in the LOC and EPMP for Parcel 1 and 2.

3.4. Initial Site Preparation Guidelines for Development

In the post-remediation period, the initial site preparations may include the use of large excavation equipment to re-contour Parcel 2. The design of that work could be of concern to DTSC and EQD depending on where it is proposed on Parcel 2 and if it involves excavations or only the delivery and distribution of certified clean off-site derived fill (see DTSC, 2001). Any fill material needs to be certified clean fill and the soil sampling data used to certify the fill is clean is required to be submitted to EQD for approval prior to delivery to Parcel 2. Also, the County may require certified clean fill documentation for Parcel 3.

3.5. Site Excavations Require a Soil Management Plan

An extensive remediation of pesticide contaminated soils was conducted on Parcel 2. Most areas of remediation removed, treated the soil, and backfilled the treated soil into the original excavation areas. The nature of the pesticide contamination as documented in the investigation reports indicated that organochlorine pesticides resided at higher concentrations near the



surface. Those areas were remediated. However, there may be the potential to encounter zones of pesticide contamination including undiscovered burial pits. Burial pits or trenches previously encountered at the site contained broken glass and metal containers buried in deep pits more than three to ten feet deep.

A Soils Management Plan (SMP) is required for any soil excavations on Parcel 2. Submittal and approval by DTSC will be conducted as detailed in 3.1.2. The SMP may range in scope and detail from a letter work plan to an extensive plan depending on the extent of proposed soil excavations. EQD will work with DTSC in determining the DTSC requirements. EQD will provide information to the Lessee(s) from DTSC staff. Lessee(s) will have no direct contact with DTSC.

3.5.1. Continuous Excavation Monitoring

During active excavation that requires a soil management plan, a dedicated environmental professional shall continuously observed the excavation activities. The environmental professional is required to have current certification for 40-Hour Health & Safety training that satisfies Occupational Safety and Health Administration (OSHA) title 29 Code of Federal Regulations (CFR) 1910.120 (HAZWOPER).

The observer will be watching for stained soil, glass bottles, broken glass container, and metal containers typical of pesticide container debris formerly found on the site. If the observer detects any of the potential pesticide container waste the observer shall immediately stop the excavation and notified EQD staff. The observer will secure the excavation area and prohibit public contact with the exposed potential pesticide debris. EQD staff will determine the next actions based on site knowledge and location of the potential pesticide debris. EQD will be responsible for notification to DTSC.

3.5.2. Soil Sampling Parameters – Indicator Chemicals

The site indicator chemicals of concern are toxaphene, Σ DDT, and DNBP (Dinoseb) greater than the site cleanup levels of 10 mg/kg for toxaphene, 70 mg/kg for Σ DDT, and 61 mg/kg for DNBP.

3.5.3. Soil Sampling Frequency

Soil samples collected in Parcel 2 are considered confirmation samples because no contamination is anticipated above the cleanup goals, see Section 3.5.2. The frequency of soil confirmation sampling will be defined in the SMP based on the extent of soil disruption and DTSC guidance.



4. References

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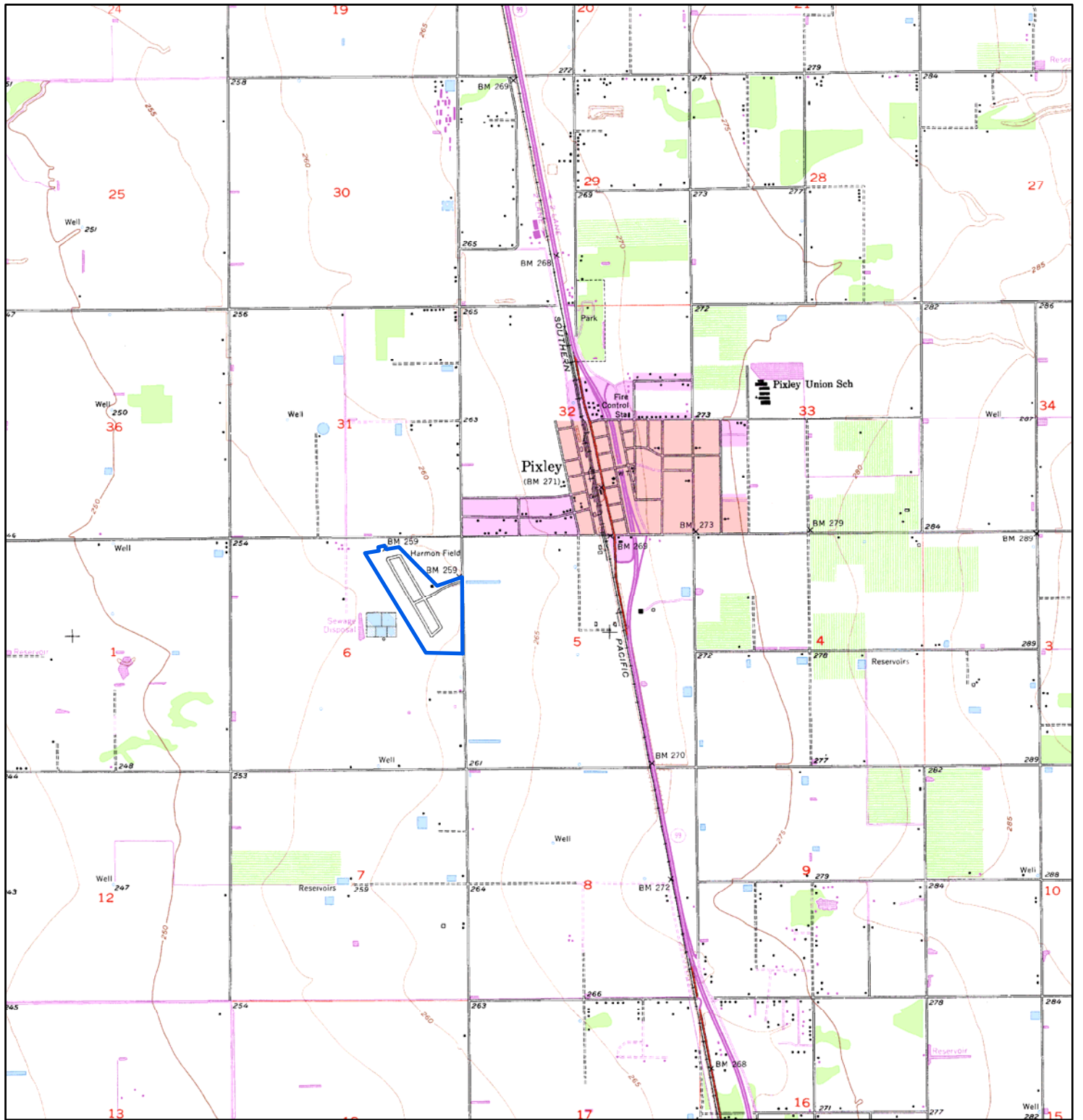
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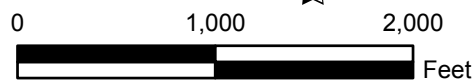


FIGURES



Legend

 Site Location



James W. Babcock, PhD, PG Consulting Geologist	
Location Map Harmon Field Site Pixley, California	
August 2016	Figure 1

EXHIBITS

Exhibit 1 – Parcel Record Map

ATTACHMENT 1

Land Use Covenant and Agreement for Parcel 1 and Parcel 2

(When available from DTSC)