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Governor's Office of Planning & Research

**Oct 22 2020**

**STATE CLEARINGHOUSE**

October 21, 2020

Department of Toxic Substances Control  
9211 Oakdale Avenue  
Chatsworth, CA 91311  
Attn: Sara Vela, Project Manager

RE: Removal Action Work Plan for Union Pacific  
Railroad Beverly Hills – Negative  
Declaration (ND)  
SCH# 2020090440  
GTS# 07-LA-2020-03376  
Vic. LA-405 PM 30.809  
Vic. LA-2 PM 10.621

Dear Sara Vela,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Removal Action Work Plan (RAW) evaluates removal action alternatives and identifies a preferred removal action based on comparative analysis of alternatives. The preferred removal action (Alternative #5) for the Site includes excavation and disposal of 4,400 cubic yards of arsenic-impacted soil up to 2 feet below ground surface (bgs) and disposal of contaminated soil at an appropriately permitted landfill and establishment of a 2-foot soil cover. Up to approximately 4,400 cubic yards of clean imported soil may be used to backfill the excavations. However, if approved development of the Site is conducted concurrently with remedial excavation activities, some areas may not be backfilled to accommodate development plans. The proposed project is anticipated to commence following approval of the RAW and would take approximately 6 weeks to complete. Upon completion of the RAW, a Land Use Covenant (LUC) in the form of deed restrictions/Institutional Controls (IC's) will be implemented.

The nearest State facilities to the proposed project are Interstate 405 and State Route 2. After reviewing the ND, Caltrans has the following comments:

All anticipated truck routes identified in Section 7 of the Removal Action Work Plan will involve the use of State Highways. Before any contaminated material is removed the Caltrans Office of Permits must be contacted to determine the appropriate combination of permits that will be

required. Below is guidance on three plan packages that may be required prior to issuance of permits.

### **Excavation Transportation and Disposal Plan Guidance Excavation Plan (EP)**

The EP must discuss all activities proposed under the requested permit that involve the excavation of contaminated soil. The EP must include:

1. Schedule for excavation of contaminated areas.
2. Soil volume estimates for each contaminated area.
3. Identification of and figure showing temporary staging areas for soil stockpiles (off Caltrans right-of-way).
4. Methods to secure and prevent access to the staging areas.
5. Soil excavation and stockpiling procedures.
6. Types of containers to be used.
7. Decontamination process.

If soil stockpiling is necessary, all stockpiles shall be located off Caltrans R/W. Stockpiles must not be located upslope from or allow entrance into storm drains, inlets, or waters of the State or placed in locations where they may come in contact with surface water run on or run off. Soil stockpiles must be placed on and covered with plastic sheeting and wetted with water to suppress dust and reduce the possibility of contamination becoming airborne. Excavation and handling of contaminated material must not result in visible dust migration. The contractor must have a water truck or tank on the job site at all times while clearing and grubbing and performing earthwork operations in work areas. Apply water to prevent visible dust.

### **Sampling and Analysis Plan (SAP)**

The SAP must include discussion of all characterization sampling, excavation, and construction activities that involve handling potentially contaminated soil during work under the permit. The SAP must provide sufficient detail to completely characterize the material proposed for excavation and disposal. The SAP must list criteria for waste profile characterization of the contaminated material to determine whether the waste is unregulated, designated waste, non-RCRA (California) hazardous waste, or RCRA hazardous waste. The SAP must also include disposal options (e.g., Class 3, Class 2, or Class 1). The SAP must comply with Cal/OSHA regulations and meet the specifications contained in USEPA, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (SW-846), Volume II: Field Manual, Chapter Nine, Section 9.1.

The SAP must include the following elements:

1. Description of Proposed Activities.
2. Data Quality Objective Process;
  - 2.1 Project task and problem definition,
  - 2.2 Data quality objectives,
  - 2.3 Data quality indicators,
  - 2.4 Data review and validation,

- 2.5 Data Management.
- 2.6 Field Methodologies and Procedures for sampling
3. Sampling Rationale including sample location and number of samples.
4. Field Methodologies and Procedures for sampling
5. Sample Handling Procedures;
  - 5.1 Collection and transfer of samples to new or laboratory-certified clean container under proper chain of custody to an Environmental Laboratory Accreditation Program (ELAP) certified laboratory.
  - 5.2 Contaminated material and water samples analyzed within the holding times specified in SW-846 Test Methods for Evaluating Solid Waste.
6. Decontamination.
7. Disposal of staging area contaminated material, water, and IDW.
8. Quality Assurance/Quality Control (QA/QC) Laboratory and Field procedures.
9. Statistical Analysis of the sample data in accordance with EPA SW-846 Test Methods for Evaluating Solid Waste.
10. Schedule for field work.

### **Transportation and Disposal Plan (TDP)**

The TDP must be prepared based on the analytical findings outlined in the SAP, identifying non-hazardous and/or hazardous disposal requirements for the contaminated material. The TDP must conform to the regulations of the DTSC and the Cal-OSHA. The plan must describe the procedures that will be followed to minimize potential health, safety, and environmental risks resulting from movement of contaminated material and equipment during on-site and off-site transport. The TDP must contain, but not be limited to the following elements:

1. Transportation, safety, and waste disposal schedule.
2. Locations of contaminated material.
3. Analytical results of contaminated material.
4. Characteristics of contaminated material to be transported with description of appearance, source, approximate quantity, nature of the contaminants and their associated hazards.
5. Dust control measures.
6. Air monitoring.
7. Identity of transporters and proof of valid hauler registration.
8. Location, type, number, and capacity of equipment, containers, and transport vehicles.
9. Analytical laboratory certified by ELAP.
10. Truck loading and staging areas.
11. Transportation route from each contaminated area of excavation to staging areas.
12. Transportation equipment and routes of transport.
13. Traffic Control and loading procedures.
14. Decontamination of trucks prior to leaving the loading area.
15. Inspection of vehicles prior to leaving site.
16. Method for preventing spills and tracking contaminated soil and spilling contaminated water onto public roads.
17. Spill contingency plan for accidental off-site releases.

18. Destination and disposition of contaminated soil and water.
19. Record Keeping.

If you have any questions, please contact project coordinator Anthony Higgins, at [anthony.higgins@dot.ca.gov](mailto:anthony.higgins@dot.ca.gov) and refer to GTS# 07-LA-2020-03376.

Sincerely,  
  
MIYA EDMONSON  
IGR/CEQA Branch Chief  
cc: Scott Morgan, State Clearinghouse