

NOTICE OF EXEMPTION

To: Office of Planning and Research
State Clearinghouse
P.O. Box 3044, 1400 Tenth Street, Room 212
Sacramento, California 95812-3044

From: Department of Toxic Substances Control
Site Mitigation and Restoration Branch
5796 Corporate Avenue
Cypress, California 90630

Project Title: Removal Action Workplan for Fremont Site # 427

Project Location: 4000 East 4th Street, Long Beach, California

County: Los Angeles

Project Applicant: Long Beach Unified School District

Approval Action Under Consideration by DTSC: Removal Action Workplan

Statutory Authority: California Health and Safety Code, Chapter 6.8

Project Description: The project involves approval of a Removal Action Workplan (RAW) for the excavation and off-site disposal of an estimated 123.5 cubic yards of soil impacted by lead, arsenic, and total petroleum hydrocarbons-diesel (TPH-d) at Fremont Site #427 (Site).

Background:

The Site is an approximately 3.8-acre elementary school, and is bounded by 4th Street to the north, East Vermont Street to the south, Termino Avenue to the west, and Roswell Avenue to the east. The Site vicinity is generally developed for residential use with limited commercial use. The Site has been occupied by a school since at least 1914; however, the current school was constructed around 1934. The eastern portion of the Site is occupied by four permanent buildings (buildings 1000, 2000, 3000, and 4000) and the western portion of the Site is occupied by six portable classrooms and an asphalt-paved playground.

Based on previous environmental Site assessments conducted by the Long Beach Unified School District (District), DTSC requested that a supplemental site investigation (SSI) at the Site. The SSI was conducted in 2021 and implemented in 2 phases. Phase I of the SSI was completed in August 2021 and included the investigation of the eastern portion of the Site which included 1) soil sampling around buildings, 2) soil sampling in the crawlspaces, 3) soil sampling at locations of historical structures, and 4) soil vapor sampling across the northern boundary of the Site. Phase II of the SSI was completed in December 2021 for investigation of the playground area located at the western portion of the Site which included soil sampling at the locations of historical structures and of the former incinerator along with a second round of soil vapor sampling. Results from Phase I showed that lead, arsenic, and total petroleum hydrocarbon diesel (TPH-d) were detected above regulatory levels in soil samples collected from the crawlspaces beneath buildings 1000, 2000, and 4000. Results from Phase II showed that lead and TPH-diesel were detected in some soil samples collected from underneath the paved playground.

Project Activities: The project activities consist of excavating contaminated soil from the crawlspaces of buildings 1000, 2000, and 4000, and from 5 locations from the paved playground area. Sampling will be conducted after excavation to confirm all contamination is removed. An estimated 123.5 cubic yards of impacted soil will be removed.

Shallow excavations of soil by hand are anticipated as part of the RAW work, along with vacuum excavations in building crawlspaces. The shallow excavations in the playground area will be excavated by hand using shovels to depth ranging from 1.5 feet below ground surface (bgs) to 5 feet bgs. Soil that is hand excavated during the project will be directly loaded into 55-gallon drums, which will be staged immediately adjacent to the proposed excavation areas. Heavy machinery is not expected to be used during these excavations. The work areas will be demarcated using cones or delineators and caution tape to limit access by non-authorized personnel. Excavations left exposed overnight will be covered with plywood and their bounds marked with delineators and caution tape. Soil excavated from the building crawlspaces will be excavated using vacuum excavation techniques. The soil vacuumed from the crawlspaces will be vacuumed directly into covered roll-off bins for storage and transport to an appropriate disposal facility based on the waste classification. Crawlspaces will be closed and secured at the end of each day to eliminate unauthorized access.

When it is necessary to temporarily store excavated soils on Site prior to transportation and disposal, the staging process will be conducted in a manner to minimize the generation of dust. At the soil staging areas, excavated soil will either be placed directly into covered roll-off bins or placed into United States Department of Transportation-approved 55-gallon drums. Stockpiling of soil on Site is not planned during the removal action. However, if stockpiling excavated soil is necessary, the soil will be placed on an impermeable barrier base (e.g., asphalt, plastic sheeting) and covered with tarps

or other proper materials to prevent run-on and/or dust generation. If significant rainfall is anticipated, the staging areas will be bermed to contain potential run-off.

Prior to stockpiling/staging, the excavated soil will be segregated to the extent possible to avoid any mixture of hazardous and non-hazardous soils. This segregation will minimize the amount of hazardous soils generated and its associated disposal cost. The soil segregation will be based upon criteria for hazardous and non-hazardous soils and the available sampling data. RCRA-designated hazardous soils will be transported to a licensed Class 1 landfill. Non-RCRA hazardous soils will be transported to a licensed Class 1 landfill or a properly permitted out-of-state disposal facility. Non-hazardous soils will be transported to an approved facility or Class 3 landfill to be recycled or for use as alternative daily cover.

Locations excavated from the playground area will be backfilled with approved clean fill and patched with asphalt. Excavations located within the crawlspaces of Buildings 1000, 2000, and 4000 will be backfilled as necessary in consultation with the District's civil engineers to maintain structural integrity of the buildings.

Air monitoring and dust control measures will be implemented during all removal activities at the Site activities. Monitoring of PM10 (i.e., particulate matter less than 10 micrometers in diameter) will be conducted in accordance with South Coast Air Quality Management District Rule 1466 (dust control for soil toxic air contaminants) and Rule 403 (implementation of best available dust control measures during active operations capable of generating fugitive dust). Particulate monitors will be placed at the fence line and activities will cease if PM10 concentration exceed 25ug/m³, or if wind speed is greater than 15 miles per hour (mph) averaged over a 15-minute period or the instantaneous wind speed exceeds 25 mph. Also, generation of dust during the removal operations will be minimized as necessary with the use of water as a dust suppressant. Air monitoring in the work area will be performed using direct reading instruments such as a photoionization detector for monitoring volatile organic compounds (VOCs) and cassette sampling to assess for arsenic and lead. Should the action level or permissible exposure limit for VOCs, arsenic, or lead be exceeded, work will stop, and appropriate procedures will be implemented to reduce employee exposure.

The removal action is expected to be implemented in two phases. The first phase will be implemented Summer 2022 and includes removing contaminated soil from the five locations in the playground area and from crawlspaces of Buildings 1000 and 4000. The second Phase is planned to be implemented Summer 2023 and includes removing contaminated soil from crawlspace of Building 2000. As required by the City of Long Beach Community Noise Ordinance (Long Beach City Code, Section 8.80.010), noise generating construction activities will be limited to between the hours of 7 a.m. to 7 p.m., Monday through Friday, including federal holidays, and between the hours of 9 a.m. to 6 p.m. on Saturdays. Construction activities will be prohibited on Sundays.

Name of Public Agency Approving Project: Department of Toxic Substances Control

Name of Person or Agency Carrying Out Project: Long Beach Unified School District

Exempt Status: (check one)

- Ministerial [PRC, Sec. 21080(b)(1); CCR, Sec. 15268]
 Declared Emergency [PRC, Sec. 21080(b)(3); CCR, Sec.15269(a)]
 Emergency Project [PRC, Sec. 21080(b)(4); CCR, Sec.15269(b)(c)]
 Categorical Exemption: [CCR Title 14, Sec. 15330]
 Statutory Exemptions: [State Code Section Number]
 Common Sense Exemption [CCR, Sec. 15061(b)(3)]

Exemption Title: Minor Actions Taken to Prevent, Minimize, Stabilize, Mitigate, or Eliminate the Release or Threat of Release of Hazardous Waste or Hazardous Substance.

Reasons Why Project is Exempt:

1. The project is a minor action designed to prevent, minimize, stabilize, mitigate, or eliminate the release or threat of release of hazardous waste or hazardous substances.
2. The project will not exceed \$1 million in cost.
3. The project will be consistent with applicable State and local environmental permitting requirements including a SCAQMD various locations permit to operate along with drilling and well permits from the Los Angeles County Environmental Health Department.
4. The project does not involve the onsite use of a hazardous waste incinerator or thermal treatment unit.
5. The project does not involve the relocation of residences or businesses.
6. The project does not involve the potential release into the air of volatile organic compounds as defined in Health and Safety Code Section 25123 (Notifications for fugitive dust emissions will be submitted to the South Coast Air Quality Management District in accordance with Rule 403 and Rule 1466).

- 7. The exceptions pursuant to California Code Regulations, Title 14 § 15300.2 have been addressed as follows:
 - a. Cumulative Impact. The project will not result in cumulative impacts because it is designed to be a short-term final remedy that would not lead to a succession of projects of the same type in the same place over time.
 - b. Significant Effect. The project does not involve any unusual circumstances so that there is no possibility that the project will have a significant effect on the environment.
 - c. Scenic Highways. The project will not damage scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, because it is not located within a highway officially designated as a state scenic highway.
 - d. Hazardous Waste Sites. The project is not located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code. (<http://calepa.ca.gov/sitecleanup/corteselist/default.htm>)
 - e. Historical Resources. The project will not cause the substantial adverse change in the significance of an historical resource at the Site because there are none at the Site.

Evidence to support the above reasons is documented in the project file record, available for inspection at:

Department of Toxic Substances Control
Site Mitigation and Restoration Branch
5796 Corporate Avenue
Cypress, California 90630

DTSC EnviroStor website: https://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=60003113

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 Branch Chief's Signature		07/15/2022 Date
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TO BE COMPLETED BY OPR ONLY

Date Received for Filing and Posting at OPR: