

## CALIFORNIA ENVIRONMENTAL QUALITY ACT NOTICE OF EXEMPTION

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

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

**Project Title:** Scanlon Early Education Center Removal Action Workplan

**Project Location:** 15 West Alhambra Road, Alhambra, California 91801

**County:** Los Angeles

**Project Applicant:** Alhambra 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 Department of Toxic Substances Control (DTSC) approved the Removal Action Workplan (RAW) for the Scanlon Early Education Center (School) Modernization area (Site). The cleanup decision document, referred to as a RAW identifies lead as a contaminant of concern and identifies the removal action to involve excavation and off-site disposal of approximately 114 cubic yards of lead impacted soil.

**Background:** The Site covers approximately 1.75 acres and is comprised of a single-story administration building constructed in the 1950s, asphalt parking, and limited planter and landscape areas. The Site is bounded by a gas station and residential uses to the east, Garland Reservoir (water tanks) to the north, Garfield Elementary School to the west, and residential uses to the south.

Based on a Preliminary Endangerment Assessment (PEA) prepared in February 2022, DTSC determined that a Supplemental Site Investigation (SSI) was required at the Site. On October 25, 2022, DTSC approved the SSI report with a RAW required determination. On December 20, 2022, the Alhambra Unified School District (District) entered into a School Cleanup Agreement (HSA-FY22/23-036) with DTSC for the oversight of the RAW at the Site.

**Project Activities:** Project activities include excavating, segregating, and stockpiling lead impacted soils with concentrations greater than the cleanup goal (CG) of 80 mg/kg of total lead. Activities will also involve conducting confirmation soil sampling, comparing confirmation sampling results to the CGs, and excavating additional soil until the CG is met. Approximately 114 cubic yards (cy) of impacted soil will be excavated and transported to an appropriate disposal facility. If needed to make excavated areas level, excavations will be backfilled with clean fill material from an offsite source or through grading operations.

If it is necessary to temporarily store the excavated soil onsite until offsite transportation and disposal, the staging process will be conducted in a manner to minimize the generation of dust. At the staging areas, excavated soil will be placed on an impermeable barrier base (e.g., asphalt floor, plastic sheeting) and covered with tarps or other proper materials to prevent any run-on and/or dust generation. If significant rainfall is anticipated, the staging areas will be bermed to contain any run-off. When possible, excavated soils may be placed in covered roll-off bins or drums, or may be loaded directly onto transportation trucks. Prior to stockpiling/staging, the excavated soil will be segregated to the extent possible to avoid any mixture of hazardous and non-hazardous soils.

Excavation areas will be controlled to avoid dust generation with physical barriers (such as perimeter fencing with windscreen), soil wetting, and air monitoring (use of real-time, data-logging aerosol monitors at property perimeter and work area). Each excavation area will be secured, and water will be applied to control any fugitive dust from migrating offsite. In addition, excavation activities will not be conducted in times of high wind conditions (e.g., wind speed exceeding 25 miles per hour).

Trucks will be visually inspected before leaving the Site and any dirt adhering to the exterior surfaces will be brushed off and collected on plastic sheeting. The storage bins or beds of the trucks will be inspected to ensure the loads are properly covered and secured. Excavation equipment surfaces will also be brushed off prior to removing it from the exclusion zone. Equipment will be decontaminated in a pre-designated area on pallets or plastic sheeting. Clean bulky equipment will be stored on plastic sheeting in unimpacted areas. Cleaned small equipment will be stored in plastic bags. Materials to be stored onsite will also be covered.

An estimated eight truckloads will be required to transport lead-impacted soil off-site. An additional eight or fewer truckloads may be required if backfilling is needed. Trucks will be staged on-site within the asphalt-covered parking areas north of the Administration Building to avoid impacts to local traffic. A flag-person provided by the contractor will direct local traffic flows as trucks enter and exit the Site.

Excavation activities will require approximately two weeks to complete.

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

**Name of Person or Agency Carrying Out Project:** Alhambra Unified School District

**Exempt Status:** Categorical Exemption: Class 30, Categorical Exemption, Title 14, Section 15330

**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. Minor Actions 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.
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 (Fugitive dust emissions will comply with South Coast Air Quality Management District Rule 403).
7. The exceptions pursuant to California Code of Regulations, Title 14, Section 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 environmental safeguards and monitoring procedures that are enforceable and made a condition of project approval will prevent unusual circumstances from occurring 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. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

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 Program  
5796 Corporate Avenue  
Cypress, CA 90630

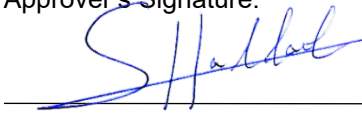
DTSC EnviroStor website: [https://www.envirostor.dtsc.ca.gov/public/profile\\_report.asp?global\\_id=60000713](https://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=60000713)

Contact Person  
Johnson Abraham

Contact Title  
Project Manager

Phone Number  
(714) 484-5380

Approver's Signature:



Date:

June 13, 2023

Approver's Name  
Shahir Haddad, P.E.

Approver's Title  
Branch Chief

Approver's Phone Number  
(714) 484-5368

TO BE COMPLETED BY OPR ONLY

---

Date Received for Filing and Posting at OPR: