



**Yana Garcia**  
Secretary for  
Environmental Protection



Department of Toxic Substances Control

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Meredith Williams, Ph.D., Director  
8800 Cal Center Drive  
Sacramento, California 95826-3200



**Gavin Newsom**  
Governor

**SENT VIA ELECTRONIC MAIL**

August 23 2024

Dana Grudem  
Senior Program Manager  
Long Beach Unified School District  
2425 Webster Avenue  
Long Beach, CA 90810  
[DGrudem@lbschools.net](mailto:DGrudem@lbschools.net)

RE: DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR THE WASHINGTON MIDDLE SCHOOL TRANSFORMATION PROJECT, DATED AUGUST 12, 2024 STATE CLEARINGHOUSE # [2024020305](#)

Dear Dana Grudem,

The Department of Toxic Substances Control (DTSC) received a Draft Environmental Impact (DEIR) for the Washington Middle School Transformation Project (Project). The proposed Project would include demolition of one relocatable building and five buildings including Administration Building A, Gymnasium Building D, the Cafeteria Building E, Auditorium Building C, and Classroom (Science/Shop) Building B. Three new permanent buildings will be constructed: a 102,000 square foot classroom/administration/cafeeteria building, a partial two-story 34,000 square foot gymnasium/ locker room/classroom/library building, and a one-story 14,000 square foot auditorium. New site improvements include a student drop off, semi-subterranean parking structure, artificial turf soccer field, synthetic track, basketball courts, pickleball

court, lunch shelter, planting, irrigation, and outdoor learning environments. Scope includes but is not limited to the following: heating, ventilation and air conditioning installation in all classrooms, offices, and support spaces (including auditorium and cafeteria) located in permanent buildings on-site; new projectors, projector screens, and marker boards in classrooms; new projectors and projector screens in cafeteria; new tactile signage required throughout the campus for rooms and exits; ADA upgrades to paths of travel, drinking fountains, and restrooms; campus-wide fire alarm upgrades; interior and exterior paint for all permanent buildings; new windows and ceiling tiles on new buildings; new landscape and planting; installation of photovoltaic panels at each roof of new permanent building and battery storage systems; removal of all on-site trees and landscaping; and surveillance cameras.

DTSC recognized that our previous [comments](#) that were submitted on February 27, 2024 have not been addressed/incorporated into the DEIR and therefore, DTSC recommends the consideration of the following comments.

1. If the district plans to use California Department of Education (CDE) State funds for the project, then the district shall comply with the requirements of Education Code (EDC), [§17210](#), [§17213.1](#), and [§17213.2](#), unless otherwise specifically exempted under section [§17268](#). If the district is not using CDE State funds for the project, or is otherwise specifically exempt under section [§17268](#), DTSC recommends the district continue to investigate, clean up the Site under the oversight of Los Angeles County and in concurrence with all applicable DTSC guidance documents, if necessary. For more information on the CDE State funding, please visit the [Office of Public-School Construction](#) webpage.

A local education agency may also voluntarily request the CDE site/plan approval for locally funded site acquisitions and new construction projects. In these cases, CDE will require DTSC to review and approve prior to its final approval, except when exempt under section 17268.

2. The NOP states, "The proposed project would include demolition of one (1) relocatable building and five (5) buildings including the Administration Building

A, Gymnasium Building D, the Cafeteria Building E, Auditorium Building C, and Classroom (Science/Shop) Building B.” If planned activities include building modifications/demolitions, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition, and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, evaluate whether polychlorinated biphenyls (PCBs) containing materials is present in onsite buildings and address as necessary to protect human health and the environment and sampling near current and/or former buildings should be conducted in accordance with DTSC’s [Update to June 2006 Phase I Addendum Guidance](#)

3. If there are any recognized environmental conditions in the project area, then proper investigation, sampling and remedial actions overseen by the appropriate regulatory agencies should be conducted prior to the new development or any construction.
4. DTSC recommends that all imported soil and fill material should be tested to ensure any contaminants of concern are within DTSC’s and U.S. Environmental Protection Agency Regional Screen Levels for the intended land use. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill material meets screening levels outlined in the [Preliminary Endangerment Assessment Guidance Manual](#) for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of the prior land use. Additional information can be found by visiting [DTSC’s Human and Ecological Risk Office \(HERO\) webpage](#). If it is determined that contaminated soil and/or groundwater exist, the EIR should identify how any required investigation and/or remediation will be conducted, and the appropriate government agency to provide regulatory oversight.

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DTSC appreciates the opportunity to comment on the DEIR for the Washington MS Transformation Project. If you would like to proceed with DTSC's school environmental review process, please visit [DTSC's Evaluating & Clean-up School 3-Step Process](#) to begin a Phase I Environmental Site Assessment.

Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like any clarification on DTSC's comments, please respond to this letter or via [email](#) for additional guidance.

Sincerely,

A handwritten signature in cursive script that reads "Tamara Purvis".

Tamara Purvis  
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HWMP – Permitting Division - CEQA Unit  
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