



**Matthew Rodriguez**  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

Barbara A. Lee, Director  
5796 Corporate Avenue  
Cypress, California 90630



**Edmund G. Brown Jr.**  
Governor

March 26, 2015

Ms. Sandra Lyon  
Superintendent of Schools  
Santa Monica Unified School District  
1615 Sixteenth Street  
Santa Monica, California 90404

APPROVAL OF THE REMOVAL ACTION COMPLETION REPORT AND ISSUANCE  
OF A NO FURTHER ACTION DETERMINATION FOR THE MALIBU HIGH SCHOOL  
BUILDING G AREA, 30215 MORNING VIEW DRIVE, MALIBU, LOS ANGELES  
COUNTY, CALIFORNIA (SITE CODE: 301648)

Dear Ms. Lyon:

The Department of Toxic Substances Control (DTSC) has completed review of the Draft Removal Action Completion Report for the Malibu High School Building G Area, prepared by ENVIRON International Corporation (ENVIRON) on behalf of the Santa Monica Malibu Unified School District (SMMUSD). The Draft Removal Action Completion Report was submitted to DTSC on February 27, 2015, and documents the soil removal activities conducted to address contaminated surface soil located adjacent to the Malibu High School (MHS) Building G Area. The intent of this letter is to provide DTSC's approval of the Removal Action Completion Report, document the reported findings, and issue a No Further Action determination for the property defined as the MHS Building G Area.

### Background

On March, 13, 2014, DTSC and the SMMUSD entered into a Voluntary Investigation Agreement (Agreement) for the purpose of conducting a comprehensive Preliminary Environmental Assessment (PEA) of the soil and groundwater at the Malibu Middle and High School (MHS) and the Juan Cabrillo Elementary School (JCES) campuses.

The PEA Work Plan was approved by DTSC on June 27, 2014, and the investigation initiated on June 30, 2014. The PEA investigation fieldwork was completed by August 18, 2014. All soil and groundwater investigation activities were conducted under DTSC's oversight and in accordance with the approved PEA Work Plan. The

investigation included the collection of soil samples from the perimeters of buildings constructed prior to 1981, the athletic fields, the MHS campus (including the areas previously investigated by ARCADIS in 2011), the JCES campus, the pad-mounted electronic transformers, the Bus Barn, the Cornucopia Gardens, and areas proposed for future redevelopment. Depending upon the historic use of the investigation area, soil and groundwater samples were analyzed for polychlorinated biphenyls (PCBs), volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), pesticides, herbicides, total petroleum hydrocarbons (TPH), and metals. Soil-vapor samples were also collected and analyzed for VOCs.

The sampling results of the PEA investigation reported the presence of the PCB Arochlor 1254 at a concentration above the United States Environmental Protection Agency's (USEPA) Regional Screening Level for residential use within a small, localized area at the MHS Building G Area. The surface soil contamination was confined to an approximately forty foot long by seven foot wide planter area, located adjacent to a concrete walkway east of the Building G Area. Although DTSC determined the contaminated surface soil did not pose a significant risk to human health, a removal action was proposed because the SMMUSD desired to exercise the option to allow for future unrestricted use of the MHS Building G Area property.

A Draft Removal Action Work Plan (Draft RAW) was prepared that defined the area of contamination, and proposed the excavation and off-Site disposal of an estimated twenty cubic yards of PCB-contaminated surface soil with the highest detected concentrations of Arochlor 1254. DTSC reviewed the Draft RAW and determined the document complied with all applicable federal, state and local requirements.

On November 7, 2014, DTSC made the Draft RAW and corresponding California Environmental Quality Act (CEQA) documentation available for a 30-day public comment period. The 30-day public comment period closed on December 10, 2014. DTSC issued an approval letter for the Draft RAW on December 15, 2014.

#### RAW Implementation

The intent of the RAW was to excavate a limited volume of PCB-impacted surface soil at the MHS Building G Area to a remedial goal that would allow for future unrestricted use of the property.

On December 22, 2014, fieldwork was initiated to implement the DTSC-approved soil removal action at the MHS Building G Area. All RAW related activities were conducted during Winter Break 2014, when the school was closed and the campus vacant. The soil removal action and all related fieldwork activities were completed by December 30, 2014.



RAW implementation was performed under DTSC's oversight, in accordance with a Site-specific Health and Safety Plan, and an Air Monitoring and Dust Control Plan. All areas of the Site where contaminated soil was excavated, relocated or temporarily stored were lined with durable plastic sheeting and overlaid with plywood. Upon completion of the removal action, all protective containment and cover materials were removed from the Site and properly disposed. Approximately fifteen cubic yards of PCB-impacted soil was excavated, determined to be non-hazardous, and transported off-site for disposal at a state permitted facility. Imported backfill soil used to return the Site to grade, was tested in accordance with DTSC's "Information Advisory – Clean Imported Fill Material" prior to being accepted for use at the school property.

#### No Further Action Determination

Based on review of the Draft Removal Action Completion Report, which summarizes the remedial action activities and soil confirmation sampling conducted after excavation and prior to backfill of the MHS Building G Area RAW implementation, DTSC has determined the removal action objectives have been met, and that the MHS Building G Area property is suitable for future unrestricted use. Therefore, by this letter, DTSC certifies that the final remedial actions have been implemented, and issues a No Further Action (NFA) determination for the MHS Building G Area property. As with any real property, if previously unidentified contamination is discovered on the property, additional assessment, investigation, and/or remediation may be required.

Thank you for your submittal of a quality document. In the event that you have questions regarding this letter, please contact DTSC's project manager, Maria Gillette, at (714) 484-5377 or [Maria.gillette@dtsc.ca.gov](mailto:Maria.gillette@dtsc.ca.gov)

Sincerely,



Yolanda Garza  
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Schools Evaluation and Brownfields Cleanup Branch

cc: See next page.

Ms. Sandra Lyon  
March 26, 2015  
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Schools Evaluation and Brownfields Cleanup Branch Reading File