



**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

December 15, 2014

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

**APPROVAL OF THE REMOVAL ACTION WORK PLAN 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) hereby approves as final the Draft Removal Action Work Plan (Draft RAW) 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 RAW was submitted to DTSC on November 7, 2014 and presents response action objectives, evaluates alternatives, and describes the preferred and recommended removal action alternative for addressing contaminated surface soil located adjacent to the Malibu High School Building G Area (Site).

The objective of the RAW is to mitigate potential risk to human health and the environment by the excavation and off-site disposal of approximately 20 cubic yards of surface soil containing elevated levels of polychlorinated biphenyls (PCBs).

DTSC, in compliance with the California Environmental Quality Act (CEQA), filed a Notice of Exemption (NOE) for the Draft RAW. A 30-day public comment period for the Draft RAW and NOE documentation was held from November 7, 2014 to December 10, 2014. DTSC received three comments from individual community members during the public comment period. No comments were submitted by the City of Malibu, or local, state and federal agencies pertaining to the proposed project. DTSC prepared the attached Response to Comments document which summarizes the community's questions and concerns submitted for the Draft RAW.

The comments submitted by the community do not require any revisions be made to the Final RAW. DTSC requests that copies of the Response to Comments and the NOE be placed in an appropriate appendix in the Final RAW.

DTSC requests that the following activities be conducted prior to implementation of the RAW:

1. Place a copy of the approved RAW, NOE, DTSC's Response to Comments, Start Work Notice and this letter in each of the designated Information Repositories within five days from the date of this letter.
2. Submit an electronic copy and one hard copy of the approved RAW to DTSC as soon as possible but no later than December 22, 2014.
3. Distribute the Start Work Notice to residents in the immediate area, parents of the students, school staff, and the stakeholders identified in DTSC's approved mailing list by December 15, 2014. A copy of the Start Work Notice shall also be posted at the Site property in plain view during implementation of the removal action.
4. Notify DTSC in writing if the RAW schedule or Site conditions change. If Site conditions change prior to RAW implementation, DTSC may require additional investigation, public participation activities, or revisions to the RAW.

The proposed removal action field work is scheduled to begin on December 22, 2014. To expedite field work, mobilization of equipment and installation of Site security measures will begin on the previous day. All field work associated with the removal action will be completed by January 2, 2015. The SMMUSD scheduled implementation of the removal action field work to coincide with the school's annual winter break when the campus is closed.

Thank you for submitting a quality document in a timely manner. In the event that you have questions regarding the proposed project, 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  
Supervising Engineer  
Brownfields and Environmental Restoration Branch  
Schools Evaluation and Brownfields Cleanup Branch

Ms. Sandra Lyon  
December 15, 2014  
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Attachment

cc: Mr. Michael O'Neill (via e-mail)  
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School Facilities Planning Division  
California Department of Education  
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Ms. Jan L. Maez (via e-mail)  
Associate Superintendent  
Chief Financial Officer  
Santa Monica-Malibu Unified School District  
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Ms. Carol Serlin, P.G., C.P.G. (via e-mail)  
Principal  
ENVIRON International Corporation  
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Ms. Maria Gillette (via e-mail)  
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Ms. Wendy Arano, P.G. (via e-mail)  
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Ms. Marcia Rubin (via e-mail)  
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Schools Evaluation and Brownfields Cleanup Branch Reading File

## ATTACHMENT

### RESPONSE TO COMMENTS FOR THE MALIBU HIGH SCHOOL BUILDING G AREA DRAFT REMOVAL ACTION WORK PLAN

#### **Comment #1.**

*"I received your notice regarding the Public Comment Period for the Draft Removal Action Work Plan (Draft RAW). The proposed removal of the PCB-contaminated soil outside of the Malibu High School Building G Area is a good idea. Although I do not personally believe that the soil presents a significant health risk, conducting a removal action is respectful of the concerns that other parents, students and staff may have."*

**Response to Comment #1.** The Department of Toxic Substances Control (DTSC) notes your comment.

#### **Comment #2.**

*"I have the following questions and concerns regarding "Option 3" of the proposed Draft RAW. I believe that during the excavation it would be difficult to contain dust from the contaminated soil, and cause more contamination than if the soil just remained in place. After the excavation, would the inside and outside of the buildings require another deep cleaning? Would the adjacent hillside require cleaning? Also, I am concerned about where the contaminated soil will be disposed. The soil may end up in the backyard of a child less fortunate than ours, and continue to pose a risk to the environment."*

**Response to Comment #2.** The proposed excavation and removal of contaminated soil at the Malibu High School Building G Area will be conducted in accordance with the DTSC approved RAW, a Site-specific Health and Safety Plan, and an Air Monitoring and Dust Control Plan. All work will be performed by a California-licensed contractor with supervision by a California-professional geologist or professional Civil Engineer. DTSC will provide regulatory oversight of the field work activities.

Dust suppression is an integral component of the RAW's Site-specific Health and Safety Plan. During the soil excavation activities, stringent measures will be implemented to minimize dust and prevent any exposure of the excavated soil to workers and adjacent areas of the school property. Generation of dust during the soil excavation and removal action will be minimized with the routine use of water as a dust suppressant. The excavation contractor will control dust generation by spraying water on the work areas prior to the start of daily work activities, during excavation/loading activities, and at truck staging locations. Sufficient water and equipment will be available to maintain proper dust control at all times.

Approximately twenty cubic yards of contaminated soil will be removed by a mini-excavator. As the soil is excavated, it will be transferred to a bobcat bucket and transported directly into roll-off bins temporarily stored at the asphalt parking area located to the west of Building G.

All areas traversed by the bobcat carrying excavated soil will be lined with Visqueen plastic sheeting and overlaid with plywood. These areas include the concrete walkways around Building G, the grassy area directly adjacent to the proposed excavation area, and a section of the asphalt parking lot where the roll-off bins will be temporarily stored. A portion of the hillside north of Building G, the grass and picnic areas will also be covered with Visqueen plastic sheeting during excavation activities. These protective measures will be taken to minimize any potential deposition of dust and soil particulates during the soil excavation and loading activities. Upon completion of the removal action, all Visqueen plastic sheeting and plywood will be removed from the Site and properly disposed.

Entry to the Site will be fenced-off and secured during the removal action to avoid unnecessary exposure and transfer of contaminated soil. To prevent cross contamination with the adjacent clean areas of the school, any trucks and equipment that come into direct contact with contaminated soil will be decontaminated prior to leaving the Site.

In addition to the required dust control measures previously described, continuous air monitoring will be conducted at the Site during all activities in which contaminated or potentially contaminated soils are being disturbed or handled. Air monitoring activities will be conducted over an 8 – 10 hour period each day, and monitored every 15 minutes during operation to ensure dust levels are controlled in a manner protective to human health.

The removal action is scheduled during Winter Break 2014 when the school is not in session. All doors and windows of the vacant classrooms and buildings will be kept securely closed during the soil excavation activities. Based upon use of the stringent dust control measures that will be required during implementation of the removal action, migration of dust outside the relatively small excavation area is not expected. Therefore, no additional cleaning of the surrounding buildings and classrooms, or adjacent hillside would be necessary.

Contaminated soil excavated from the Site will be transported to an appropriate permitted off-site disposal facility. Prior to exiting the loading/fenced area at the Site, the trucks will be decontaminated to remove any dust or soil, and the roll-off bins properly secured for transport. Prior to transporting the excavated soil off-site, an authorized representative of the Santa Monica Malibu Unified School District (SMMUSD) will sign the required manifest documentation.



**Comment #3.**

*"Please let me know the planned schedule for the removal action field work."*

**Response to Comment #3.** The proposed removal action is planned to be implemented during Winter Break 2014, when school is not in session. The soil removal activities are scheduled to begin on December 22, 2014. To maintain the expedited schedule, equipment will be mobilized at the Site and security fencing erected on December 21, 2014. The excavation action is expected to be completed within five working days. Backfilling activities and the restoration of the excavated area to its original condition are expected to be completed in two working days. All field work activities associated with the removal action and restoration will be completed by Friday, January 2, 2014.