



July 24, 2024

Mr. Carey Upton  
Chief Operations Officer  
Santa Monica-Malibu Unified School District  
Facilities Improvements Projects  
2828 4<sup>th</sup> Street  
Santa Monica, California 90405

**Subject: Work Practices During Earthwork Activities  
McKinley Elementary School**  
2401 Santa Monica Boulevard  
Santa Monica, California  
Project Number: SMSD-24-12075

Dear Mr. Upton:

In May 2024, NV5 prepared a Removal Action Workplan (RAW) for a proposed classroom building at the McKinley Elementary School project site (herein referred to as “the Site”). One of the objectives of the RAW was to select a remedial method to address the slightly elevated concentrations of naturally occurring arsenic detected in Site soils. The remedial action selected included the excavation, compaction, reuse, and capping of the arsenic containing soil at the Site.

As part of the RAW, specifications for work practices, dust mitigation measures, and air monitoring procedures were developed to ensure the safety of both Site workers and nearby community members during earthmoving activities.

The RAW was submitted to the California Department of Toxic Substances Control (DTSC) in May 2024, and deemed technically adequate and acceptable for public review and comment in their letter to the Santa Monica Malibu Unified School District dated May 13, 2024.

In order to maintain compliance with requirements of the South Coast Air Quality Management District (SCAQMD) Rule 1466, the selected remedial method was changed to include the excavation and disposal of Site soils that would be disturbed as part of planned construction activities.

While the remedial action method used to address arsenic containing soils at the school was changed, the work practices, mitigation measures, and monitoring requirements that would have been used remain unchanged from what was originally planned. In fact, specifications and procedures for the removal and disposal of arsenic impacted soil were included in the RAW document (Section 7.6 through 7.7) and will be followed accordingly.

The specific mitigation measures that will be employed during the soil removal include:

- **Site Access Control (RAW Section 7.1.3)** Just as previously planned, access to the Site will be limited during removal of the impacted material by use of perimeter construction fencing covered with soundwall or dust screen. Access gates will be kept closed and locked during non-working

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hours to ensure that unauthorized personnel have not access to work areas and/or arsenic impacted material.

- **Dust Suppression (RAW Section 7.3)** Soil excavation activities will still be completed using similar equipment and dust suppression work practices as originally planned. Dust suppression will be performed by spraying water on the excavation area during earthmoving activities. Care will be taken to avoid excessive water application that could cause a non-storm water runoff event at the Site.
- **Dust Monitoring (RAW Section 7.3.1)** As required by SCAQMD Rule 1466, air samplers will be deployed along the project perimeter. These monitors measure and record ambient dust levels during earthmoving activities involving arsenic impacted soil. The monitors provide real time data to on-site dust monitoring personnel who can alert construction personnel to employ additional dust suppression measures if needed to maintain compliance with air quality requirements.

Weather monitoring is also conducted during earthmoving activities. In the event of elevated winds, earthmoving work will be suspended.

- **Soil Management (RAW Section 7.4)** The soil staging process will still be conducted in a manner to minimize the generation of dust. At the staging areas, excavated soil will be covered with tarps or other proper materials (e.g., plastic sheeting) to prevent any run-on and/or dust generation when grading activities are not being conducted. Stockpiles will be kept within the fenced enclosure of the work area to prevent unauthorized access.
- **Material Loading (RAW Section 7.6)** Soil drop heights will be minimized to prevent the creation of dust plumes during loading.
- **Track Out Prevention and Housekeeping (Sections 7.5 and 7.6)** Trucks hauling the waste soil will have their wheels and sides brushed and swept of loose contaminated soil prior to leaving the work area and exiting the property. Truck beds will also be covered prior to exiting the property. The paved areas between the work area entrance and property exit will be periodically cleaned. If any track out onto the Street occurs, it will be immediately removed.

The implementation of the prescribed work practices, mitigation measures, and air monitoring procedures described above and included in the RAW, have been successfully used on numerous similar projects throughout California by multiple contractors, property owners, and public agencies to protect the health and safety of Site workers and community members.

NV5 has previously participated in and/or conducted air monitoring (SCAQMD Rule 403 and/or Rule 1466) on numerous contaminated soil removal projects in Southern California including:

- Malibu High School – PCB impacted soil removal
- Los Angeles Department of Public Works – Vignes Street impacted soil removal (arsenic, lead, and VOC impacted soils)
- Los Angeles Unified School District – Numerous school campuses (arsenic, lead, and pesticide impacted soils)
- Honda of Hollywood – Petroleum impacted soil removal
- The Panama Site, Marina Del Rey – Former electronic and aerospace manufacturing facility (solvent and metals impacted soils)

The successful and safe completion of these projects was accomplished by using the same mitigation and monitoring procedures that were described in the original RAW and will be employed during the completion of this project.

### Closing Remarks

Although the remedial action method used to address arsenic containing soils at the school was changed, this change does not increase the potential health risks to students, staff, or neighboring community members. The change should actually lower the potential for risk for exposure in the future as the impacted soil that could be disturbed during future construction activities will be removed from the Site.

The work practices, mitigation measures, and monitoring requirements that will be used remain unchanged from what was originally planned in the RAW that was reviewed and deemed acceptable by the DTSC.

We look forward to working with the rest of the construction team to safely complete this phase of the project. Please call me at (562) 495-5777 should you have questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "E Frasse", is centered on a light gray rectangular background.

Eric Frasse, PE  
Project Manager / Senior Engineer