

CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION

2019078005

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: Grant K-8 School Removal Action Workplan

Project Location: 1425 Washington Place, San Diego, 92103

County: San Diego

Project Description: The project involves excavation and offsite disposal of waste debris on the Grant K-8 school property (Site). The cleanup decision document, referred to as a Removal Action Workplan (RAW), summarized investigation of onsite waste debris which were determined to have elevated concentrations of lead and dioxins. After the waste debris removal from the Site, erosion control measures (i.e., backfilling, grading, vegetation) will be implemented by using clean import fill, overburden soils approved by DTSC for onsite reuse, and/or material from other portions of the District-owned property. DTSC approved the RAW, prepared by Ninyo & Moore, in accordance with requirements of the California Education Code, Section 17213.2.

Background: The Site is an approximately 1.5-acre portion of the Grant K-8 school in an undeveloped southwestern corner of the school property. The Site is bounded to the north by metal fencing followed by the school buildings/facilities; to the east by undeveloped ravine; to the west by Pioneer Park, residential properties, and an undeveloped canyon; and to the south by a concrete-lined drainage channel followed by West Washington Street. School buildings have been located north of the Site since approximately 1914. Grading and filling activities were performed along the top of the slope beginning in 1949. Burned waste was encountered in 2015 during slope repair activities on the Site.

Based on field observations, surficial waste debris was observed scattered at various locations at the Site and in the fill/alluvium to depths of at least 4 feet. The waste debris ranged from 0.5-foot to 3.5 feet in thickness. The waste debris observed at the Site during a Preliminary Environmental Assessment (PEA) is considered to be secondary, minor waste debris deposits because of the absence of an observed primary, in-place waste deposit (e.g., continuous lenses or layers of wastes, ash), presence of only minor amounts of broken and scattered waste debris mixed into the fill/alluvium, and the Site was the location of a recent reconstruction project that occurred in 2015 and earlier building construction project that occurred in 1956.

The contaminants of potential concern (COPCs) evaluated in the PEA at the Site include detected metals (i.e., antimony, arsenic, barium, beryllium, chromium, cobalt, copper, lead, mercury, molybdenum, nickel, silver, thallium, vanadium, zinc), total petroleum hydrocarbons, detected volatile organic compounds (i.e., methylene chloride, trichlorofluoromethane), detected semi-volatile organic compounds, and dioxins. The COPCs are specifically related to the waste debris and fill/alluvium mixed with waste debris (referred to collectively as waste debris). Contamination of groundwater, surface water, and air are not considered to be of concern at the Site.

The RAW is being implemented by the San Diego Unified School District with DTSC oversight under the Master Oversight Agreement (Docket Number HAS-A 01/02-034) dated June 9, 2015.

Project Activities: The project activities involve excavation and offsite disposal of waste debris on the Site. Wastes generated will be transported offsite to waste disposal facilities licensed to receive the wastes and that have pre-approved their disposal. Based on the estimated volumes of wastes to be removed (1,830 tons), it is anticipated that the wastes and soils will be disposed of at one waste disposal site facility. It is anticipated that approximately 102 truckloads (1,830 tons divided by 18 tons per truckload) will be required to haul the waste debris/soils for disposal as non-RCRA California-hazardous waste. After the waste debris have been removed, erosion control measures will be implemented with the use of either clean import fill, overburden soils approved by DTSC for onsite reuse, and/or material from other portions of the District-owned property for backfilling and grading and vegetation. Based on the results of the PEA, project activities could create fugitive dust or airborne particulates impacted with COPCs. To prevent inhalation of COPCs, fugitive dust will be controlled through implementation of standard construction institutional controls (e.g., applying water) during waste debris removal.

In the event biological, cultural or historical resources are discovered during project activities, work will be suspended while a qualified biologist or cultural or historical resource specialist assesses the area and arrangements are made to protect or preserve any resources that are discovered. If human remains are discovered, no further disturbance will occur in the location where the remains are found, and the County Coroner will be notified pursuant to the Health and Safety Code, Chapter 2, Section 7050.5.

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

Name of Person or Agency Carrying Out Project: San Diego Unified School District (SDUSD)

Exemption Status: (check one)

- Ministerial [PRC, Sec. 21080(b)(1); CCR, Sec. 15268]
- Declared Emergency [PRC, Sec. 21080(b)(3); CCR, Sec. 15269(a)]
- Emergency Project [PRC, Sec. 21080(b)(4); CCR, Sec. 15269(b)(c)]
- Categorical Exemption: [Section 15330, Class 30]
- Statutory Exemptions: [State code section number]
- General Rule [CCR, Sec. 15061(b)(3)]


Exemption Title: Minor Actions to Prevent, Minimize, Stabilize, Mitigate or Eliminate the Release or Threat of Release of Hazardous Waste or Hazardous Substances.

Reasons Why Project is Exempt:

1. The project is a minor action designed 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 does not involve the onsite use of a hazardous waste incinerator or thermal treatment unit or the relocation of residences or businesses; and does not involve the potential release into the air of volatile organic compounds as defined in Health and Safety Code Section 25123.
4. The exceptions pursuant to Cal. Code Regs., tit. 14, § 15300.2 have been addressed as follows:
 - a. Cumulative Impact. The final remedy will 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. Historical Resources. The project will not cause a substantial adverse change in the significance of a historical resource at the Site because there are none at the Site.

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, California 90630

Aslam Shareef Project Manager Name	Hazardous Substances Engineer Project Manager Title	(714) 484-5472 Phone #
 Unit Chief Signature		6/28/19 Date
Shahin Haddad Unit Chief Name	Sup Haz. Subs. Engr. Unit Chief Title	Phone #

TO BE COMPLETED BY OPR ONLY

Date Received For Filing and Posting at OPR:

Governor's Office of Planning & Research

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