

# NOTICE OF EXEMPTION 2019088046

**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, California 90630

<b>Project Title:</b> Remedial Action Plan Avalon K-12 School Property and City of Avalon Warehouse Property		
<b>Project Address:</b> 200 and 661 Falls Canyon Road	<b>City:</b> Avalon	<b>County:</b> Los Angeles
<b>Approval Action Under Consideration by DTSC:</b>		
<input type="checkbox"/> Initial Permit Issuance	<input type="checkbox"/> Permit Re-Issuance	<input type="checkbox"/> Permit Modification
<input type="checkbox"/> Removal Action Workplan	<input checked="" type="checkbox"/> Remedial Action Plan	<input type="checkbox"/> Closure Plan
<input type="checkbox"/> Corrective Measure Study/Statement of Basis		<input type="checkbox"/> Interim Removal
		<input type="checkbox"/> Regulations
		<input type="checkbox"/> Other (specify):
<b>Statutory Authority:</b>		
<input type="checkbox"/> California H&SC, Chap. 6.5	<input checked="" type="checkbox"/> California H&SC, Chap. 6.8	<input type="checkbox"/> Other (specify):

**Project Description:** The project involves the approval of a Remedial Action Plan (RAP) for Avalon School Property and adjacent Warehouse Property (both properties collectively referred to as the Site). The Remedial alternative selected in the RAP include excavation and offsite disposal of soil impacted with arsenic, lead, polycyclic aromatic hydrocarbons (PAHs), and dioxins in the School Property and a cap over the southeast portion of the Warehouse Property Removal areas will be backfilled with clean soil and/or covered with hardscape at the School Property to prevent direct contact to underlying soils. A Land Use Covenant (LUC) will be recorded to restrict future land uses and Soil Management Plan (SMP) will be prepared for future ground-breaking activities at the Site.

**Background:** The Site is approximately 12 acres and consists of the School Main Campus, designated as Operable Unit 1 (OU-1), School Ball Field (OU-2A), and Warehouse Property (OU-2B). The School Main Campus and School Ball Field is approximately 11 acres in size and is owned by the Long Beach Unified School District (LBUSD). The Warehouse Property is owned by the City of Avalon (City), covers approximately one acre located to the northwest of the School Property, and currently contains two buildings and an outside storage area. A former electric power plant and portion of the manufactured gas plant (MGP) were previously located on the Warehouse Property.

The first documented development of the Site occurred in the upper portion of Falls Canyon in late 1919 with the construction of a MGP. MGP operation commenced in 1920 and ended in 1947 when the electric power plant was dismantled and removed. On the Warehouse Property, a former electric plant building was converted into a storage building. In 1920, Santa Catalina Island Company (SCICo) sold a portion of the Site to the City of Avalon, and in 1924 SCICo sold a portion of the Site to LBUSD. Later in 1924, development of the lower portion of Falls Canyon began with the construction of the first building for Avalon High School. In 1960, the western portion of the current School Property was acquired by LBUSD to construct a ball field. In 1978, LBUSD purchased a portion of an adjacent former golf course for use as elementary school portable classrooms.

During the summer of 2005 and 2006, approximately 7,000 cubic yards (cy) of soils impacted with lead, dioxins/furans, and arsenic in five areas at the Site were excavated and then stabilized and disposed of offsite.

Several investigations conducted at the Site indicate that soil was historically impacted by arsenic, lead, PAHs, and dioxins. The contaminants of concern (COCs) identified for each portion of the Site are described below.

*OU-1:* Dioxins were identified as COCs based on elevated concentrations in two samples. Lead was also identified as a COC based on the comparison of the Site data to the screening levels derived in the Human Health Risk Assessment (HHRA) for students and workers. However, dioxins contribute the majority to the risk estimate.

*OU-2A:* Carcinogenic PAHs were identified as COCs and contribute the majority to the risk estimates based on elevated concentrations in soil samples.

*OU-2B:* Carcinogenic PAHs were identified as COCs based on elevated concentrations in soil samples.

*OU-1, OU-2A, and OU-2B:* Arsenic was identified as a Site-wide COC based on a comparison with background arsenic concentrations. The arsenic exceedances in soil were found in both surface and subsurface samples and occur sporadically throughout the Site.

**Project Activities:** The project activities consist of excavation up to 5-foot depth and disposal of approximately 475 cy of impacted soils at the School Property to meet the student remedial goal in soils, backfill to original depths with clean soil and/or hardscape over the removal areas at the School Property, a cap of approximately 7,500 square-feet over the southeast portion of the Warehouse Property, and institutional controls. Institutional controls would include restrictions on land use and activities at the Site and a site-specific Soils Management Plan (SMP).

During excavation activities, a rubber tire excavator with the capability of excavating soil and loading the soil directly into staged roll-off bins will be used. Soil will be directly loaded or staged then loaded into roll-off bins and temporarily staged onsite pending transportation and disposal to an appropriate off-island facility. The roll-off bins will be covered during transport to an off-site Class I landfill in Kettleman City, California for soil stabilization and disposal.

Dust control measures, such as soil wetting, will be implemented during soil excavation activities to reduce the potential to generate dust. Air monitoring will also be conducted for fugitive dust with fence line low flow pumps to monitor the effectiveness of dust control measures. Additionally, a low visibility/permeability wind screen will be placed to surround the excavation areas.

After excavation, 1-sack sand slurry backfill topped with clean soil and/or hardscape will be placed over the removal areas at the School Property and over the southeast portion of the Warehouse Property to prevent potential direct contact to remaining underlying soils. The 1-sack sand slurry is available on the island. A LUC will also be recorded to restrict future land uses in coordination with DTSC and a SMP will be prepared to manage any future ground-breaking activities at the Site.

Removal activities are anticipated to be conducted in fall of 2019 over a one-month period during summer break when school classes are not in session.

The RAP is being implemented by GSI Environmental with DTSC oversight under an Imminent and Substantial Endangerment Determination and Order and Remedial Action Order, Docket Number I/SED 11/12-003.

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:** Avalon Property

**Exempt 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: [CCR, Sec. 15330]
- Statutory Exemptions: [State code section number]
- Common Sense Exemption [CCR, Sec. 15061(b)(3)]

**Exemption Title:** *Common Sense Exemption* - Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment.

**Reasons Why Project is Exempt:** Previous remediation activities associated with approval of a previous RAP at the Site were analyzed for potential environmental impacts in an Initial Study/Negative Declaration (ISND) (SCH 2005069039) prepared by DTSC in June 2005. Remediation activities at the Site previously analyzed included excavation and offsite stabilization and disposal of soil impacted with lead, dioxins/furans, and arsenic in five areas across the existing Avalon School site, totaling approximately 7,000 cy. The previously excavated soils were transported and disposed of at the same Class I landfill in Kettleman City, California. The ISND determined that the previous project activities involving excavation and offsite disposal of contaminated soils would not result in any significant or potentially significant impacts requiring implementation of mitigation measures.

The proposed project activities would excavate and transport approximately 475 cy of contaminated soils which is significantly less than the 7,000-cy analyzed in the previous ISND. The proposed remediation activities (e.g., excavation equipment, techniques, and timing) are also substantially similar to those activities analyzed in the previous ISND. Based on the conclusions made in the previous ISND and the significantly smaller nature of remediation activities, the proposed project is considered to also result in no impacts or less-than-significant impacts.

Therefore, DTSC has determined with certainty that there is no possibility that the activities in question may have a significant effect on the environment because the project would not result in "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance."

The project is consistent with applicable state and local environmental permitting requirements including, but not limited to, off-site disposal, air quality rules such as those governing volatile organic compounds and water quality standards, and approved by the regulatory body with jurisdiction over the site. Prior to implementing field activities, all necessary permits will be obtained from the County of Los Angeles, and South Coast Air Quality Management District.

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

[https://www.envirostor.dtsc.ca.gov/public/profile\\_report.asp?global\\_id=60001560](https://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=60001560)

_____ Joe Hwong Project Manager	_____ Sr. Engineering Geologist Title	_____ 714-484-5449 Phone No.
_____  Branch Chief's Signature	_____ Branch Chief Title	_____ 8/13/19 Date
_____ Javier Hinojosa Branch Chief	_____ Branch Chief Title	_____ 714-484-5484 Phone No.

<b>TO BE COMPLETED BY OPR ONLY</b>	
Date Received for Filing and Posting at OPR:	Governor's Office of Planning & Research <b>AUG 14 2019</b> <b>STATE CLEARINGHOUSE</b>