


Memorandum

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To: DAVID GOULD
Environmental Planner
Southern San Joaquin Valley Management Branch III

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From: MICHAEL LEONGSON, P.E. 78953
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Central Region Hazardous Waste and Paleontology Branch

Subject: REQUEST FOR COMPLIANCE STUDIES- INITIAL SITE ASSESSMENT
Stratford Kings River Bridge Replacement Project

The environmental review, consultation, and any other actions required by applicable Federal environmental laws for this project are being, or have been, carried out by Caltrans pursuant to 23 United States Code (U.S.C.) 327 and the Memorandum of Understanding dated December 23, 2016 and executed by Federal Highway Administration (FHWA) and Caltrans.

The Hazardous Waste Branch is responding to a request to provide an environmental assessment to facilitate the replacement of the Stratford Kings River Bridge. The project proposes to demolish the existing bridge and build a replacement structure within the current alignment of State Route (SR) 41. A 50-foot temporary wood trestle bridge will be constructed along the east side of the existing bridge to assist with the dismantling and assembly of the new structure. In addition, a detour is proposed to redirect traffic from the project area via SR 198/Avenal Cutoff/Interstate 5/SR 41. A second detour along Laurel Avenue and 22nd Avenue is also proposed to allow residents to navigate around the project. Per the project engineers, additional work will not be required along either detour route.

Based on the current project description, construction activities will occur off the paved roadway and, per the project engineer, excess soils requiring disposal off-site are anticipated. Temporary construction easements (TCEs) are proposed for two properties located immediately east of the bridge (APNs 026-230-04 and 026-230-016) which will be used to support construction activities.

Preliminary Site Investigations

An aerially-deposited lead (ADL) survey was conducted by IT Corporation on behalf of Caltrans in February 2001 along State Route (SR) 41 in Kings County. The survey was conducted along SR 41 between postmile (PM) 28.4 and 33.0, which included the current project area (PM 32.26).

Lead was detected within the project area at a maximum concentration of 696 milligrams per kilogram (mg/kg). The average total lead concentration within the project area was calculated at 39.22 mg/kg and the 95% Upper Confidence Level (UCL) for total lead was calculated at 124.4 mg/kg. Soluble lead was not detected above the soluble threshold limit concentration (STLC) within the project area. The maximum detected concentration of soluble lead was 3.16 mg/kg. The elevated lead concentrations were limited to the upper foot of the soil profile. Based on these results, soils from this location could pose a health risk to workers engaged in soil disturbing activities and would be considered a Type C regulated waste (95% total lead UCL is above 80 mg/kg and below 320 mg/kg). Soils exceeding this stipulated threshold will either be disposed of at a hazardous waste disposal facility or managed under the ADL Agreement (July 1, 2016) between Caltrans and the DTSC, which allows such soils to be safely reused within the project limits providing all requirements of the ADL Agreement are met.

An asbestos-containing materials (ACMs) and lead-containing paint (LCP) survey was conducted on Stratford Kings River bridge (45-007) in May 2019 by Geocon Consultants, Inc. (Geocon). According to the report, ACMs were not detected in the six bulk-samples collected from the project site.

Lead was detected in one of the four samples collected from suspect tan graffiti abatement paint at a concentration of 34 mg/kg. The paint has been applied to the sidewalls of the bridge and covers an area of approximately 100 square feet. At the detected concentrations the paint would not be classified as a California or Federal hazardous waste; however, the paint is identified as lead-containing and is subject to Cal/OSHA compliance and training requirements regarding construction activities where workers may be exposed.

Database Review

The following five Cal/EPA Data Resources, commonly referred to as the 'Cortese List', were searched for this review:

- EnviroStor database, List of Hazardous Waste and Substances sites, Department of Toxic Substances Control (DTSC)
- GeoTracker database, List of open/active Leaking Underground Storage Tank (LUST) sites, State Water Resources Control Board (SWRCB)
- Sites Identified with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit, SWRCB
- List of active Cease and Desist Orders and Cleanup and Abatement Orders (CDO/CAO), SWRCB
- List of hazardous waste facilities subject to corrective action, DTSC

Additional searches included:

- Solid Waste Information System (SWIS) database, Department of Resources Recycling and Recovery (Cal-Recycle).
- CalEPA Regulated Sites database

The database search did not identify any facilities that would affect the project.

Conclusions

ADL has been detected throughout the project area. Include the following Standard Special Provisions (SSPs):

- SSP 7-1.02K(6)(j)(ii) – Lead Compliance Plan; and,
- SSP 14-11.08- Regulated Material Containing Aerially-Deposited Lead

The estimated cost to include the lead compliance plan is \$2,500.

Metal-beam guardrails are located along the approaches to the bridge. SSP 14-11.14 Treated Wood Waste will be required to address handling and disposal of any wood waste generated during the project.

For the removal of white and/or yellow striping/paint/markings, include SSP 84-9.03 B and/or SSP 14-11.12. In addition, depending upon the method of asphalt removal, SSP 36-4 may be applicable.

Per the San Joaquin Valley Air Pollution Control District (SJVAPCD), demolitions or renovations of regulated facilities warrant testing of the bridge/structure. National Emission Standards for Hazardous Air Pollutants (NESHAP, an EPA regulation) requires that written notification be provided to the SJVAPCD at least 10 days before any bridge demolition occurs whether asbestos is present or not. Include SSP 14-9.02 for details regarding NESHAP reporting. In addition, include SSP 14-11.13 - Disturbance of existing paint systems on bridges, which will need to be edited prior to its inclusion in the construction package.

The following resources should be added to the project:

- Unit 1410, 40 hours, WBS 165 – Update ISA
- Unit 1410, 40 hours, WBS 255 – Reevaluation/PS&E Review/DTSC Notification
- Unit 1410, 60 hours, WBS 280 –Construction Support/DTSC Notification

If additional information is needed, please contact Adam Inman at (559) 445-5782.