Department of Toxic Substances Control

Matthew Rodriquez
Secretary for
Environmental Protection

Barbara A. Lee, Director
5796 Corporate Avenue
Cypress, California 90630

Edmund G. Brown Jr.
Governor

July 9, 2015

Ms. Pamela Pence
Senior Project Manager
Sierra Sands Unified School District
113 W. Felspar Avenue
Ridgecrest, California 93555

REVIEW OF DRAFT REMOVAL ACTION WORK PLAN, SIERRA SANDS UNIFIED SCHOOL DISTRICT, NEW MURRAY MIDDLE SCHOOL, NORTHWEST CORNER E. FRENCH DRIVE AND E. DRUMMOND AVENUE, RIDGECREST, KERN COUNTY (SITE CODE: 104727)

Dear Ms. Pence:

The Department of Toxic Substances Control (DTSC) reviewed the Removal Action Work Plan (RAW), prepared by Placeworks, dated April 29, 2015 and received on April 30, 2015. The School Cleanup Agreement (SCA) was executed on May 25, 2015. The RAW presents background information, identifies and evaluates removal action alternatives, and proposes a removal action for the organochlorine pesticides (OCPs) impacted soil at New Murray Middle School Site (Site).

The Site consists of an approximately 38-acre re-configured property located within the Naval Air Weapons Station, China Lake (NAWSCL) on the northwest corner of East French Drive and East Drummond Avenue in Ridgecrest, California. The Site is currently undeveloped with a foundation of a decommissioned electrical substation and infrastructure (i.e., roads, sewers, etc.) for former housing units remaining onsite. The northern portion of the Site was formerly developed by the Navy, with housing units built in the late 1950s and demolished in 2002. The former electrical substation used for power distribution within NAWSCL was located at the southeastern side of the Site (demolished in 2013 with the exception of the foundations). Based on the historical uses, Preliminary Environmental Assessment (PEA) and Supplemental Site Investigation (SSI) soil samples were analyzed for lead based paint (LBP) in former base housing, pesticide residues in soil due to potential use of insecticides or herbicides around former residential structures, polychlorinated biphenyls (PCBs) or dioxins/furans residues in soil due to reported historical use of oils on roads or around construction sites for dust control. The DTSC-approved SSI concluded that

the Site was impacted by OCPs, and recommended preparation of a removal action workplan (RAW).

DTSC has identified outstanding discrepancies in the RAW that require clarification or modification. The enclosed comments identify these discrepancies. Please submit a table with responses to the enclosed comments and a revised document by July 16, 2015. The table should restate each comment and provide the associated response and cross-reference responses to pages in the RAW.

If you have any questions regarding the project, please contact me at (714) 484-5308 or at ashareef@dtsc.ca.gov.

Sincerely,

Aslam Shareef
Project Manager
Schools Unit – Cypress Office
Brownfields and Environmental Restoration Program

cc: Mr. Ronald Cavagrotti (via email)
Placeworks
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DTSC COMMENTS
DRAFT REMOVAL ACTION WORK PLAN
NEW MURRAY MIDDLE SCHOOL SITE
SIERRA SANDS UNIFIED SCHOOL DISTRICT
NORTHWEST CORNER E. FRENCH DRIVE AND E. DRUMMOND AVENUE, RIDGECREST, CALIFORNIA

The following DTSC staff reviewed and provided comments herein to the RAW. Please contact the Project Manager if you have any questions on the comments. Original comments from the DTSC staff are available for review in DTSC project files.

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GENERAL COMMENTS:

Any variance from the approved RAW should be documented in the Field Variance section of the Removal Action Completion Report (RACR).

SPECIFIC COMMENTS:

1. Section 6.3.3, Page #39 (Alternative 3)

This section needs to be revised based on the recordation of the restrictions in the Base Master Plan. Based on the outcome of the mechanism to control the restriction, the language on "deed restriction" and/or "Land Use Covenant (LUC)" should be revised in this section.

2. Section 8.3, Burial Cell Construction

A design document for the Burial Cell should be submitted for DTSC review and approval. This document can be incorporated into the RAW and a stand-alone document may not be warranted. The design document should detail the design parameters and final engineering drawings for the remedies proposed in the RAW.

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GENERAL COMMENTS:

1. The RAW does not clarify how the confirmation sampling data will be used. Even though the projected area for removal is based on the school based scenario, 95% UCL calculations based on the sampling results (confirmation + ones above residential scenario – PEA/SSI) should be evaluated. If 95% passes the residential based screening number, a case can be made for NFA for areas A,B,C and D following excavation and no land use covenant will be required on the areas A,B, C and D.

SPECIFIC COMMENTS:

1. Section 8.2.4 Permits and Plans

   The section describes the design package including engineering drawings for burial cell will be prepared and submitted separately. The school district may incorporate the design package as an appendix in the RAW.

2. Soil Staging

   About over 20,000 cubic yards of impacted soil is estimated to be moved around the Site and during the process would need to be stockpiled onsite. However, it is not clear if the stockpiled soil (excavated from impacted areas) will be sampled and profiled before transferring to the onsite burial. If yes, please elaborate on the sampling and analysis procedures for the stockpile. Since some of the excavated soil may be due to extrapolation of the PEA/SSI results, it may be below the action levels that can be used and may not be subjected to disposal or onsite burial.

3. A conceptual or draft operation and maintenance plan (O&M Plan) will be required for the selected Alternative 3 (Soil Excavation with On-Site Burial, Capping and Land Use Covenant) for the RAW. A final O&M Plan can be developed and submitted following the RAW Approval and remedy implementation.

4. Design for the soil cover for the Capping should be based on the DTSC Guidance 'Proven Technologies and Remedies Guidance Remediation of Metals in Soil' section 8.4.1.

5. Table 5 Estimated Cost for Remedial Alternatives should include/clarify

   - Present worth cost estimate details with discounted rate and rate of inflation.

   - Cost for import fill is included for Alternative 2 and not for Alternative 3. Please clarify why import fill is not included for selected Alternative 3.