Fact Sheet, June 2009

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

The mission of the Department of Toxic Substances Control is to provide the highest level of safety, and to protect public health and the environment from toxic harm.

State of California

Cal/EPA

Home Gardens Elementary School Cleanup Plan Available For Review

A draft plan to remove soil contaminated with organochlorine pesticides [OCPs] at the existing Home Gardens Elementary School is open for public review and comment. The draft plan, called a Removal Action Workplan, or RAW, was submitted by Corona-Norco Unified School District [CNUSD]. The project is located at 13550 Tolton Avenue in Corona, California.

This Fact Sheet provides a brief summary of:

- Why Cleanup Is Necessary
- History and Operations at the Site
- Environmental Investigations
- Proposed Cleanup Options
- Safety & Dust Control During Cleanup
- Proposed Transportation Route for Trucks
- California Environmental Quality Act
- Next Steps
- Frequently Asked Questions
- Where to Find the Documents
- Who to Contact for Information

Why Cleanup Is Necessary

There is **no** immediate health risk because the public is not exposed to the contaminated soil. However, because long-term exposure to elevated levels of OCPs can cause adverse health effects, DTSC recommends that the CNUSD prepare a cleanup plan to remove and dispose the affected soil to protect future occupants of the property. DTSC will oversee the removal action and ensure that it is performed in a manner that does not harm people or the environment.

PUBLIC COMMENT PERIOD
June 12, 2009 – July 13, 2009

The draft RAW and other related project documents for this school site are available for review and public comment at the locations listed on page 3. The DTSC will make a final decision on the RAW after all public comments have been reviewed and considered. Please submit written comments **by July 13, 2009**; or by email to:

Jeanne Matsumoto, Public Participation Specialist
5796 Corporate Avenue, Cypress, CA 90630
jmatsumo@dtsc.ca.gov

History and Operations at site

A review of historical records indicated that the site has been operated as a school since 1948, when the school's main building was completed. Prior to development of the school, the site was used for agricultural purposes (as early as 1931, and perhaps earlier). Expansion of the school, including the addition of new buildings and portable classrooms, continued through 2000. The site is currently undergoing extensive remodeling, including removal of most of the old buildings and construction of larger classrooms. During recent testing, residues of termiticides (insecticides for termite removal) formerly used around many of the old buildings were found in the soil.

Environmental Investigations

As part of preparing for the new construction at the school, CNUSD initiated an environmental investigation in November 2007. Soil and soil gas samples were collected in areas of suspected termiticide usage; soil samples were collected from the ball field area, the former grove and from around former buildings; soil vapor samples were collected throughout the site for volatile organic compounds [VOC] analysis; and near-surface soil samples were collected from two transformer locations for poly-chlorinated biphenyls [PCBs] analysis.

Based on the findings of these activities, two areas require further action due to elevated concentrations of termiticide residues. The termiticides are comprised of several organochlorine pesticides (OCPs). Additional samples were collected to further define the extent of OCP contamination. One area is an approximately 30 by 30 foot area located in the immediate vicinity of a former pump-house building, and the other area is an approximately 30 by 45 foot area located under the footprint of the proposed classroom building. The CNUSD proposes to remove an estimated total 400 cubic yards of contaminated soil.

Proposed Cleanup Options

The following four Cleanup Options were considered for this site:

Alternative 1 – No Further Action

Alternative 2 – Treatment

Alternative 3 – Containment / Surface Capping

Alternative 4 – Excavation and Off-Site Disposal

Based on careful analysis of the options, excavation and off-site disposal was recommended because it protects human health and the environment, is permanent, and has a reasonable cost. Details of the removal action alternatives are listed in Section 5 of the Draft RAW.

The contaminated soil will be dug out using an excavator, bulldozer, shovels, or other types of earth moving equipment, as necessary. The soil will be either temporarily stockpiled or loaded directly onto trucks and taken off-site to be disposed at a licensed disposal facility. The soil will be stockpiled on the site only long enough to profile the soil for offsite disposal. After the contaminated soil has been excavated, soil samples will be collected and analyzed to confirm that the contamination has been adequately removed.

Safety & Dust Control during Cleanup

The soil at the site contains sufficient clay to minimize the potential for dust generation, if the soil is kept moist. The following actions will be implemented during this process to ensure public safety and minimize dust:

- Spray work areas with clean water to control dust
- Install temporary fencing with windscreens for security and dust control, if needed
- Drive all vehicles at slow speeds while on the property
- Secure trucks with covers before leaving the site
- Brush truck tires entering and exiting the site to remove soils and debris
- Monitor the air at the site to ensure the amount of dust stays at safe levels

Proposed Transportation Route for Trucks

It will take about 30 truckloads to remove the contaminated soil from the site. Trucks will leave the site going north on Grant Street, proceed southwest on Magnolia Avenue to Interstate 15, then by Interstate to the disposal destination. The soil will be taken to a state licensed and approved disposal and/or treatment facility. This work is limited to the hours between 7 a.m. and 5 p.m. daily. The cleanup process is expected to take about one week.

California Environmental Quality Act

In compliance with the California Environmental Quality Act (CEQA), DTSC has prepared a draft Notice of Exemption (NOE) for this project. The NOE states that the proposed cleanup will not have a significant negative effect on human health and the environment because of short duration, relatively small amount of contaminated soil to be removed, and the controlled way in which the contaminated soils will be dug out, loaded onto trucks and taken away to an approved/permitted facility for lawful disposal.

Next Steps

At the close of the Public Comment Period, DTSC will review and consider any public comments and make necessary revisions to the draft RAW prior to final approval. Also, a Response to Comments Document will be mailed to everyone who makes a comment and provides their name and address. The soil removal is expected to take place in June 2009, and should take about one week. After the cleanup process is completed, CNUSD will conduct soil testing to confirm cleanup goals have been reached and submit a Removal Action Completion Report to the DTSC for review and approval.

Where to Find the Documents

The Draft RAW and other related documents for the project are available for review at the following locations:

Corona-Norco Unified School District
Facilities Division
2820 Clark Avenue
Norco, CA
Phone: (951) 736-5045
Hours: Monday–Friday 8:00am–4:30pm

Corona Public Library
650 S. Main Street
Corona, CA 92882
Phone: 951-736-2381
Hours:
Monday–Thursday 10:00am-9:00pm
Friday & Saturday 10:00am-5:00pm
Sunday closed

Home Gardens Library
3785 Neece Street
Corona, CA 92879
Phone: (951) 279-2148
Hours:
Monday & Tuesday 12:00pm-8:00pm
Wednesday & Thursday 10:00am-6:00pm
Friday & Saturday 10:00am-5:00pm
Sunday 1:00 pm – 5:00 pm

Department of Toxic Substances Control
Regional Records Office
5796 Corporate Avenue
Cypress, CA 90630
Contact: (714) 484-5337, Julie Johnson for appt.
Hours: 8 a.m. – 5 p.m. Monday – Friday
Site documents are also available for review at: www.envirostor.dtsc.ca.gov.

Who to Contact for More Information

If you have any questions about the project or cleanup activities, please contact:
Juan Osornio
DTSC Project Manager
(714) 484-5498
josornio@dtsc.ca.gov

Jeanne Matsumoto
DTSC Public Participation Specialist
(714) 484-5338 or toll free 1-866-495-5651
jmatsumo@dtsc.ca.gov

Media Inquiries:
Sandra Friedman
DTSC Public Information Officer
(714) 484-5383
sfriedma@dtsc.ca.gov

Notice to Hearing-Impaired Individuals
You can obtain additional information about the site by using the California State Relay Service at 1 (888) 877-5378 (TDD). Ask them to contact Jeanne Matsumoto at (714) 484-5338 regarding the project.

Frequently Asked Questions

A community survey was mailed to 1,000 households in the vicinity of Home Gardens Elementary School. A total of 53 replies were received. Answers to commonly asked questions in those returned surveys are summarized below.

Where did the organochlorine pesticides or OCPs come from?

The OCPs are residues of pesticides used to kill termites. The pesticides were probably applied to the soil around older wooden buildings in response to a termite infestation detected in the 1980's. At that time, these OCPs were the most common pesticides used to kill termites. The use of OCPs for termites has been prohibited since 1989.

How do these OCPs affect people?

At high doses, the OCPs can affect the nervous system, kidneys, liver, lungs, eyes, skin and are also suspected to cause cancer. However, the concentrations detected at the site are too low to cause any of these affects.

Will OCPs also affect the air or water?

The OCPs are not soluble in water, and therefore do not pose a threat to groundwater or drinking water. The OCPs also have a very poor ability to vaporize, so they do not pose a threat to air quality except if attached to airborne dust.

How mobile are OCPs?

OCPs bind to soil which makes them very immobile in soil. As an example, soil samples collected around the former pump house found elevated concentrations in the upper 6 inches of soil, but did not detect OCPs at a depth of 2.5 feet. The OCPs are believed to have been applied more than 20 years ago, so the migration rate in soil is less than 1 foot in 10 years.

Is the vertical and lateral extent of OCPs well known?

Yes. Over 100 soil samples were collected and tested for OCPs from throughout the site, and only two areas require action. The lateral extent of the two areas was defined by collecting soil samples at approximately 10 foot intervals.

How harmful is the dust generated at the site?

The concentrations of OCPs in the soil are too low to pose a hazard due to inhalation of dust. Dust itself can be harmful, and the harmful effects of inhaling the dust would far exceed the harmful effects of the OCPs attached to that dust. To minimize the amount of dust generated, the steps outlined in the "Safety & Dust Control during Cleanup" section of this fact sheet will be implemented.

What will happen to the contaminated soil?

The contaminated soil will be transported to a landfill for disposal.

Why wasn't this known earlier? Was a study done when the school was first built?

Environmental studies were not performed when the school was first built in 1948. The process was first developed in about 1986, and school properties were not required to be evaluated until about 1999. It is unlikely the termiticides would have even been present at that time since they are believed to have been applied in the 1980's in response to a termite infestation.

The level of knowledge regarding the safety of chemicals increases over time. When chemicals are found to be unsafe, restrictions on the use of those chemicals are put into place. In the 1980's, these OCPs were thought to be safe if used as directed. The OCPs were found at this time because the reconstruction of the school triggered testing requirements.