

STATE OF CALIFORNIA
ENVIRONMENTAL PROTECTION AGENCY
DEPARTMENT OF TOXIC SUBSTANCES CONTROL

In the Matter of:

Palos Verdes Unified School District
property at 32201 Forrestal Drive,
Rancho Palos Verdes, California

Respondent:

Palos Verdes Peninsula Unified School
District
375 Via Almar
Palos Verdes Estates
California, 90274

Docket # HWCA20167265

ORDER TO FENCE AND POST

Health and Safety Code
Section 25359.5

AUTHORITY

1. This administrative order is issued pursuant to section 25359.5 of the California Health and Safety Code. Respondent is subject to the provisions of chapters 6.5 and 6.8 of division 20 of the Health and Safety Code because there has been a release of a hazardous substance on, under, or into the land of the subject site.

2. The Department of Toxic Substances Control (Department) administers and enforces the provisions of the Hazardous Substances Account Act (hereinafter the Act), as contained in Health and Safety Code section 25300 et seq.

3. This Order is effective immediately upon receipt by the Respondent. All times for performance shall be calculated from the date of receipt.

SITE DESCRIPTION

4. The property subject to this order is Palos Verdes Unified School District

Upper Soccer Field property located at 32201 Forrestal Drive, Rancho Palos Verdes, California 90275 in the County of Los Angeles (Site).

5. Attached as Appendix "A" is a map of the Site and immediate surrounding area showing the location of facilities, buildings, residences, surface water, wells or other relevant structures on the Site.

OWNERSHIP

6. The Site subject to this order is owned by Palos Verdes Peninsula Unified School District (PVPUSD) (Respondent).

HEALTH AND ENVIRONMENT ASSESSMENT

7. The Site is a soccer field area situated in a primarily suburban area with an approximate population of 42,282 persons.

8. There has been a release on the Site of asbestos, which is considered a hazardous substance pursuant to Health and Safety Code section 25316.

9. The Site poses a public health risk should human contact occur with the hazardous substances or surrounding contaminated area. Asbestos was determined to be in debris scattered over the surface of the stockpiled soil at the Site. Asbestos can cause cancer. Exposure to asbestos by inhalation can cause fibrotic lung disease (asbestosis) and changes in the lining of the chest cavity (pleura). These diseases can lead to reduced respiratory function and death. Long-term inhalation of asbestos fibers also increases the risk of lung cancer and mesothelioma.

10. There is a likelihood of human or domestic animal contact at this Site because the Site is in a residential community, immediately adjacent to a soccer field where children routinely play soccer. It is also near hiking trails that are frequented by

hikers and dogs.

11. Samples have been taken from the Site as shown on the Site map attached as Appendix "B". The most noteworthy sample results are indicated directly on the Site map with the analysis reports attached as Appendix "C".

FINDINGS OF FACT AND CONCLUSIONS OF LAW

12. The Department has determined that the requirements of Health and Safety Code section 25359.5 have been met.

13. There has been a release of hazardous substances on, under, or into the land of this Site, and this order is necessary to protect the public health.

14. The release does not comply with the terms of a current permit or interim status document or regulation of the Department.

15. The Site poses a public health risk if human contact is made with the hazardous substance or the nearby surrounding contaminated area.

16. There is a likelihood of human or domestic animal contact at this Site.

ORDER

Based on the foregoing Findings of Fact and Conclusions of Law, it is hereby ORDERED that:

17. Respondent shall install a fence on the Site to secure, at a minimum, the area specified on the Site map (Appendix "A") identified as "Stockpiled Soil Pile", and any other area where soil from this Stockpiled Soil Pile has been deposited.

Additionally, the Stockpiled Soil Pile, and any parts of the soccer field in which soil from the Stockpiled Soil Pile was used as fill, must be covered with heavy duty fabric weight plastic sheeting. The existing chain link fence surrounding the Upper Soccer Field, as

shown in Appendix "A", must at all times remain locked and access to the public must at all times be denied.

18. The fence shall be constructed according to the specifications attached as Appendix "D".

19. The fence shall be installed within five (5) days of the date of this order. Signs shall be posted within five (5) days of the date of this order, with lettering legible from a distance of at least 25 feet which states, "Caution: Hazardous Substance Area, Unauthorized Persons Keep Out", in both English and Spanish. The signs shall include the name of the Department, and the telephone number of the Department's Cypress Regional Office, (714) 484-5300. The Department also recommends that the Respondent attach "do not enter" international symbol signs at appropriate intervals to the fence to prevent injury to individuals who cannot read the sign.

20. The signs shall be visible from the area surrounding the contaminated area and posted at each route of entry into the Site, including those routes likely to be used by unauthorized persons, access roads leading to the Site, and facing rivers, creeks, lakes or other waterways where appropriate.

21. The fence, plastic sheeting, and signs shall be continuously maintained to minimize the risk of unauthorized entry. The signs shall be of a material able to withstand the elements.

PENALTIES FOR NON-COMPLIANCE

22. Failure to comply with this Order will result in the Department securing and posting the Site. After completion of the project, the Department will seek full cost of recovery pursuant to Health and Safety Code section 25359.5(d).

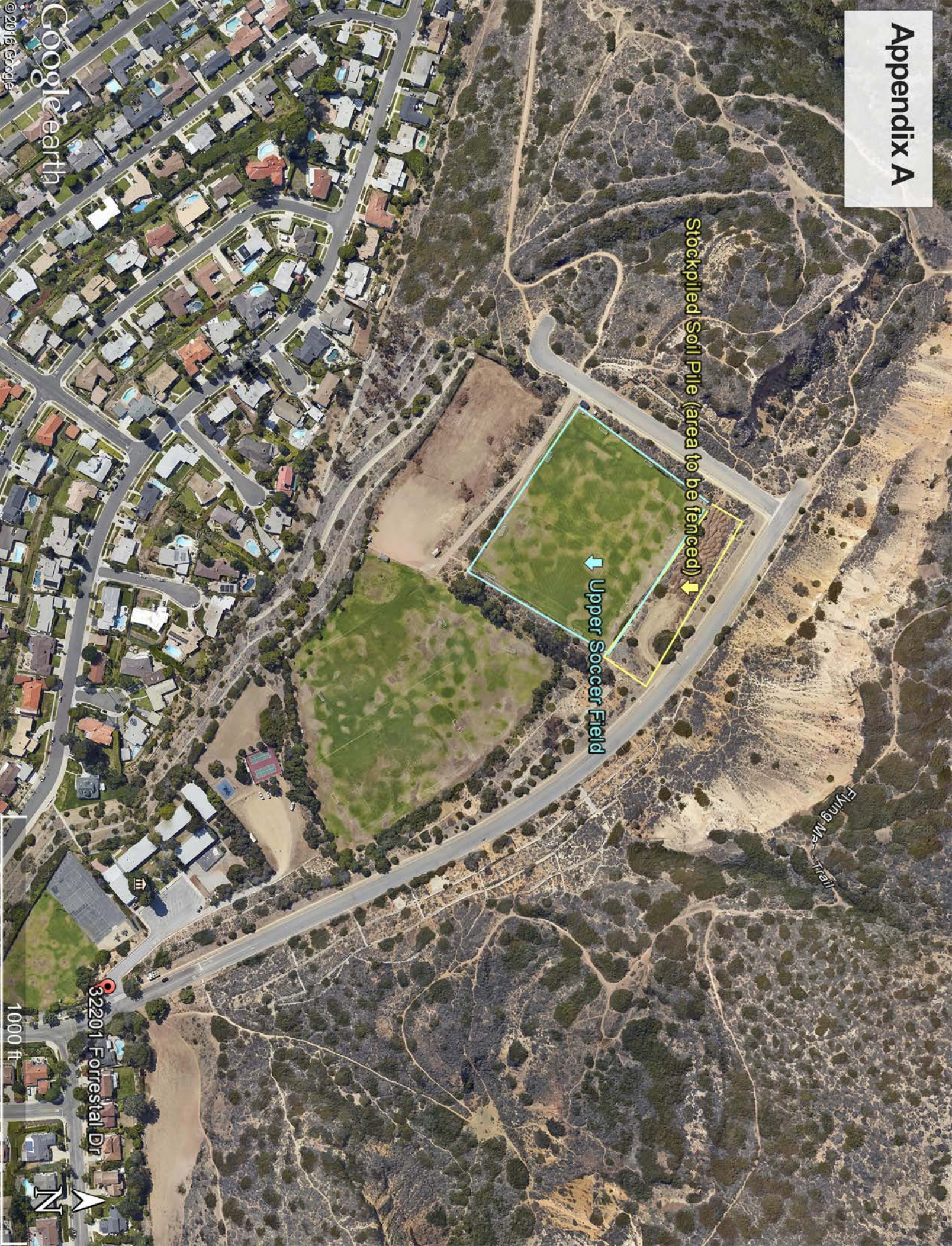
23. Failure to comply with this Order, or any portion thereof, may subject Respondent to a civil penalty of up to \$25,000 pursuant to Health and Safety Code section 25359.5(d).

DATED: 8/1/16

Signature Redacted -

Hansen Pang
Chief Investigator
Department of Toxic Substances Control

Appendix A



Stockpiled Soil Pile (area to be fenced)

Upper Soccer Field

Flying Man Trail

32201 Forrester Dr

1000 ft

APPENDIX B

↓ Stockpiled Soil Pile

- Samples:
- 1 Alta Environmental Sample = 30% asbestos (yellow sheet vinyl)
(Sample # LL8)
 - 2 Alta Environmental Sample = 35% asbestos (roofing debris w/mastic)
(Sample # 102915-5)
 - 3 Alta Environmental Sample = 15% asbestos (white floor tile w/mastic)
(Sample # LL4)

Upper Soccer Field ↓





*Privileged, confidential, discussion draft
prepared at the direction of counsel*

December 3, 2015

Mr. Terry Tao, Esq.
Senior Partner
Atkinson, Andelson, Loya, Ruud & Romo
12800 Center Court Drive, Suite 300
Cerritos, California 90703

Re: Summary Report – Limited Soil Sampling of Imported and Stockpiled Soils at the Ladera Linda Park, Upper Field, 32201 Forrestal Drive, Rancho Palos Verdes, California 90275

Alta Environmental Project No. AALR-15-5668

Dear Mr. Tao:

1 INTRODUCTION

Alta Environmental was requested by Atkinson, Andelson, Loya, Ruud & Romo (AALRR) and the Palos Verdes Peninsula Unified School District (PVPUSD) to conduct limited environmental soil sampling to assess imported and stockpiled soils at the Ladera Linda Park Upper Field, 32201 Forrestal Drive, Rancho Palos Verdes, California (Figure 1, Attachment A). The soil sampling was completed in accordance with the initially agreed upon scope of services between the PVPUSD and Alta Environmental, on October 28, 2015, and modified November 17, 2015.

On November 20, 2015 prior to field sampling, a meeting was held onsite, with representatives from the PVPUSD, AALRR, and Alta Environmental. The limited soil sampling and investigation described herein, was conducted in accordance with the scope of work agreed upon during the onsite meeting. The purpose of this sampling was limited in nature, and was not conducted for the purposes of fully characterizing the soils onsite.

2 SITE DESCRIPTION

The Ladera Linda Upper Field Park is located along a gated section of Forrestal Road, in Rancho Palos Verdes, California. The park consists of two (2) fenced and grass-covered soccer playing fields in the south, and an approximately 400' by 60' portion of undeveloped and graded land in the north (the "Site", Figure 2, Attachment A). It was within this approximately 400' by 60' portion of land that imported soils were reported to have been stockpiled and then spread out on the exposed soil.

3 SOIL SAMPLING AND ANALYSIS

3.1 Soil Sampling

On November 20, 2015, Alta Environmental collected discrete soil samples from seven (7) hand auger borings ranging from approximately 0.5 to 1 foot below ground surface (bgs). The seven (7) soil sample locations included three (3) in the northern portion of the Site (LLUF-NE, LLUF-NC, and LLUF-NW); three (3) in the southern portion of the Site (LLUF-SE, LLUF-SC, and LLUF-SW); and one (1) within the center of the soil stockpile (LLUF-SP) located at the west end of the Site. A Site layout and final soil sampling location map is presented as Figure 2 (Attachment A).

Each discrete soil sample was preserved using in-field preservation methods in accordance with EPA Method 5035 for volatile analysis. The sample containers were then capped, sealed, labeled, and transported in a chilled ice chest under chain-of-custody documentation to a State-certified laboratory.

3.2 Laboratory Analysis

Soil samples were transported under chain of custody documentation to American Environmental Testing Laboratories (AETL) for subsequent chemical analysis.

The seven (7) discrete soil samples collected from each boring were preserved in accordance with EPA Method 5035 and analyzed for the following:

- Volatile Organic Compounds (VOCs) by EPA Method 8260B/5035
- Total Petroleum Hydrocarbons (TPH) as gasoline (TPH-g) by EPA Method 8015B/5035
- TPH as diesel (TPH-d) and TPH as oil (TPH-o) by EPA Method 8015B
- Organochlorine Pesticides (OCPs) by EPA Method 8081A
- Polychlorinated Biphenyls (PCBs) by EPA Method 8082
- Chlorinated Herbicides by EPA Method 8151A
- Organophosphorus Pesticides (OPPs) by EPA Method 8141B
- CCR Title 22 (CAM 17) Metals by EPA Methods located 6010B/7470A
- Hexavalent Chromium by EPA Method 7199

In addition split soil samples were transported under chain of custody documentation to LA Testing (also known as EMSL), a laboratory accredited by the National Voluntary Laboratory Accreditation Program (NVLAP) administered by the National Institute of Standards and Technology (NIST), located in South Pasadena, California, and analyzed for the following:

- Asbestos content by OSHA ID 191

4 BUILDING MATERIAL SAMPLING

Bulk samples of building material debris observed at the Site were collected in order to determine the presence of asbestos. The samples were subsequently analyzed by EPA Method 600 R-93/116 at AQ Environmental Laboratory in Signal Hill, California. AQ is a NAVLAP accredited facility. Samples were collected over the period of two site visits which occurred on October 29, 2015 and on November 20, 2015. Photographs of the bulk material samples collected on November 20, 2015 are located in Attachment D.

5 SAMPLE RESULTS

A summary of the analytical results for the soil samples is presented in Table 1 (Attachment B). Copies of the laboratory analytical report and chain-of-custody documentation are provided as Attachment C.

5.1 Soil Results

As indicated in the analytical results table (Table 1, Attachment B), the soil samples collected from the Site exhibited detectable concentrations of Title 22 metals including barium, chromium, hexavalent chromium, cobalt, copper, lead, molybdenum, nickel, vanadium, and zinc.

Concentrations of several OCPs, including Chlordane total, Chlordane alpha, 4,4'-DDD, 4,4'-DDE, 4,4'-DDT, Endrin, Chlordane gamma, and Heptachlor Epoxide, were detected above laboratory reporting limits.

Total petroleum hydrocarbons (TPH), including TPH-d and TPH-o, were detected above laboratory reporting limits in one sample, LLUF-NC-1.

No VOCs, chlorinated herbicides, OPPs, or PCBs were detected above laboratory reporting limits in the samples analyzed. Additionally, no asbestos was detected in the soil matrix in the soil samples collected.

All concentrations of metals and OCPs detected above reporting limits were below the applicable California and/or RCRA (federal) hazardous waste criteria threshold values. The reported values were also below the stated residential screening levels as defined by the Office of Environmental Health Hazard Assessment (OEHHHA) Soil and Soil Gas Screening Numbers for Nonvolatile Chemicals Based on Total Exposure to Contaminated Soil: Inhalation, Ingestion and Dermal Absorption (Residential Scenario) <http://www.oehha.ca.gov/risk/chhs/table.html>.

No asbestos was detected in the soil matrix samples submitted for analysis.

5.2 Building Material Results

Asbestos, in regulated concentrations, was detected in samples collected of various construction materials including roofing material with mastic, floor tile debris and vinyl sheet flooring with paper backing. Both the roofing mastic and floor tile are considered non-friable; however, the vinyl sheet flooring with paper backing is considered to be friable. Detailed results can be found in Table 2 (October 29, 2015) and Table 3 (November 20, 2015) Attachment B. Sample locations for the October 29, 2015 and November 20, 2015 sampling events are provided in Figures 3 and 4, respectively.

6 ASSUMPTIONS AND LIMITATIONS

This report was prepared exclusively for use by the Palos Verdes Peninsula Unified School District (PVPUSD) and Atkinson, Andelson, Loya, Ruud & Romo (AALRR), and may not be relied upon by any other person or entity without Alta Environmental's express written permission. The information, conclusions and recommendations described in this report apply to conditions existing at certain locations when services were performed and are intended only for the specific purposes, locations, time frames and project parameters indicated. Alta Environmental cannot be responsible for the impact of any changes in environmental standards, practices or regulations after performance of services.

In performing our professional services, we have applied present engineering and scientific judgment and used a level of effort consistent with the current standard of practice for similar types of studies.

As applicable, Alta Environmental has relied in good faith upon representations and information furnished by individuals with respect to operations and existing property conditions, to the extent that they have not been contradicted by data obtained from other sources. Accordingly, Alta Environmental accepts no responsibility for any deficiencies, omissions, misrepresentations, or fraudulent acts of persons interviewed.

Limited Soil Sampling

Alta Environmental will not accept any liability for loss, injury claim, or damage arising directly or indirectly from any use or reliance on this report. Alta Environmental makes no warranty, expressed or implied.

For and on behalf of Alta Environmental,


Kristyn Drake
Associate Consultant II


Steven Morrill, PE
Senior Project Manager/Engineer III



David R. Schack
Vice President, Building Sciences
Cal-OSHA Certified Asbestos Consultant
CAC 92-0219

Attachments:

- A – Figures (1 – Site Location Map, 2 – Site Layout and Soil Sample Location Map, 3 – Asbestos Bulk Sample Location Map 10/29/15, 4 – Asbestos Bulk Sample Location Map 11/20/15)
- B – Tables (1 – Soil Sample Analytical Results, 2 – Asbestos in Building Materials 10/29/15, 3 – Asbestos in Building Materials 11/20/15)
- C – Laboratory Analytical Report and Chain-of-Custody Documentation
- D – Photographs

TABLE 2
Asbestos in Building Materials for October 29, 2015 Sampling
Ladera Linda Upper Park

Asbestos in Bulk Material EPA Method 600 R-93/116								Regulatory Limits	
Sample ID	102915-1	102915-2	102915-3	102915-4	102915-5	102915-6	102915-7	EPA/SCAQMD Threshold	California and/or RCRA Hazardous Waste Criteria
Sample Date	10/29/2015	10/29/2015	10/29/2015	10/29/2015	10/29/2015	10/29/2015	10/29/2015		
Asbestos	Cementitious Debris	Clay Pipe	Roofing Debris	Cementitious Debris	Roofing Debris with mastic	Roofing Debris	Stucco		
	ND	ND	ND	ND	35%	ND	ND	>1%	>1% Friable

TABLE 3
Asbestos in Building Materials for November 20, 2015 Sampling
Ladera Linda Upper Park

Asbestos in Bulk Material EPA Method 600 R-93/116									Regulatory Limits	
Sample ID	LL1	LL2	LL3	LL4	LL5	LL6	LL7	LL8	EPA/SCAQMD Threshold	California and/or RCRA Hazardous Waste Criteria
Sample Date	11/20/2015	11/20/2015	11/20/2015	11/20/2015	11/20/2015	11/20/2015	11/20/2015	11/20/2015		
Asbestos	White Gypsum	Grey ceramic tile with mastic	White Stucco	White floor tile and mastic	Red Roofing	Rolled on roofing	Roofing felt	Yellow sheet vinyl		
	ND	ND	ND	15%	ND	ND	ND	30%	>1%	>1% Friable



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Signal Hill, CA 90755
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Alta Environmental
3777 Long Beach Blvd.
Long Beach CA 90807
Attn.: David Schack

Report Number 1521833

Date Received 10/29/2015

Date Analyzed 11/01/2015

Date Reported 11/02/2015

Project Number PVPU-15-5638

Project Name Ladera Linda-Soil

Location Ladera Linda - Upper Field

PO Number PVPU-15-5638

WO Number PVPU-15-5638

Date Sampled 10/29/2015

Sampled By D. Schack

Total Samples 7

Method of Analysis 40 CFR Part 763 Appendix E to Subpart E, EPA Method 600/M4-82-020; updated method 600 R-93/116
Determination of Asbestos in Bulk Building Materials.

Test Report

Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Non-Asbestos Components	(%)	Asbestos Type	(%)
1521833-001 102915-1	East Area Cementitious Debris, White, Non-homogeneous	LAYER 1 100%	Mineral Wool Calcium Carbonate Quartz Binder/Filler	5% 25% 15% 55%	None Detected	
Asbestos Present: No		Total % Non-Asbestos:		100.0%	Total %Asbestos:	No Asbestos Detected
1521833-002 102915-2	West Area Clay Pipe, Red, Homogeneous	LAYER 1 100%	Quartz Clay Minerals	25% 75%	None Detected	
Asbestos Present: No		Total % Non-Asbestos:		100.0%	Total %Asbestos:	No Asbestos Detected
1521833-003 102915-3	Center LAYER 1 Roofing Debris - Comp. Roofing, Gray/Brown/Black, Non-homogeneous	LAYER 1 70%	Fibrous Glass Bituminous Matrix/Filler Other Non-Fibrous Material	10% 65% 25%	None Detected	
	LAYER 2 Comp. Roofing, Gray/Black, Non-homogeneous	LAYER 2 30%	Fibrous Glass Bituminous Matrix/Filler Other Non-Fibrous Material	15% 65% 20%	None Detected	
Asbestos Present: No		Total % Non-Asbestos:		100.0%	Total %Asbestos:	No Asbestos Detected
1521833-004 102915-4	Center Area Cementitious Debris, Cream, Homogeneous	LAYER 1 100%	Mineral Wool Calcium Carbonate Quartz Binder/Filler	5% 25% 15% 55%	None Detected	
Asbestos Present: No		Total % Non-Asbestos:		100.0%	Total %Asbestos:	No Asbestos Detected
1521833-005 102915-5	Center Area Roofing Debris, Brown/Black, Non-homogeneous	LAYER 1 100%	Fibrous Glass Bituminous Matrix/Filler	10% 55%	Chrysotile	35%
Asbestos Present: Yes		Total % Non-Asbestos:		65.0%	Total %Asbestos:	35.0%



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Attn.: Eric Fleming

Project Number AALR-15-5668
Project Name Ladera Linda
Location Ladera Linda Park
PO Number
WO Number

Report Number 1522070

Date Received 11/23/2015

Date Sampled

Date Analyzed 11/23/2015

Sampled By Eric J. Fleming

Date Reported 11/23/2015

Total Samples 9

Method of Analysis 40 CFR Part 763 Appendix E to Subpart E, EPA Method 600/M4-82-020; updated method 600 R-93/116
Determination of Asbestos in Bulk Building Materials.

Test Report

Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Non-Asbestos Components	(%)	Asbestos Type	(%)
1522070-001 LL1	Gypsum, White, Non-homogeneous	LAYER 1 100%	Calcium Carbonate Diatomaceous Material	35% 65%	None Detected	
Asbestos Present: No		Total % Non-Asbestos:		100.0%	Total %Asbestos:	No Asbestos Detected
1522070-002 LL2	Ceramic Tile, Gray, Homogeneous	LAYER 1 100%	Calcium Carbonate Quartz	50% 50%	None Detected	
Asbestos Present: No		Total % Non-Asbestos:		100.0%	Total %Asbestos:	No Asbestos Detected
1522070-003 LL3	Stucco, Brown/White, Non-homogeneous	LAYER 1 100%	Quartz Calcium Carbonate Other Non-Fibrous Material	55% 25% 20%	None Detected	
Asbestos Present: No		Total % Non-Asbestos:		100.0%	Total %Asbestos:	No Asbestos Detected
1522070-004 LL4A	Floor Tile, White, Homogeneous	LAYER 1 100%	Fibrous Talc Calcium Carbonate Vinyl Binder/ Filler	5% 40% 40%	Chrysotile	15%
Asbestos Present: Yes		Total % Non-Asbestos:		85.0%	Total %Asbestos:	15.0%
1522070-005 LL4B	Mastic, Black, Homogeneous	LAYER 1 100%	Bituminous Matrix/Filler	100%	None Detected	
Asbestos Present: No		Total % Non-Asbestos:		100.0%	Total %Asbestos:	No Asbestos Detected
1522070-006 LL5	Roofing, Red/Black, Non-homogeneous	LAYER 1 100%	Cellulose Fiber Bituminous Matrix Other Non-Fibrous Material	45% 35% 20%	None Detected	
Asbestos Present: No		Total % Non-Asbestos:		100.0%	Total %Asbestos:	No Asbestos Detected



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Attn.: Eric Fleming

Project Number AALR-15-5668
Project Name Ladera Linda
Location Ladera Linda Park
PO Number
WO Number

Report Number 1522070

Date Received 11/23/2015
Date Analyzed 11/23/2015
Date Reported 11/23/2015

Date Sampled
Sampled By Eric J. Fleming
Total Samples 9

Method of Analysis 40 CFR Part 763 Appendix E to Subpart E, EPA Method 600/M4-82-020; updated method 600 R-93/116
Determination of Asbestos in Bulk Building Materials.

Test Report

Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Non-Asbestos Components	(%)	Asbestos Type	(%)
1522070-007 LL6	Rolled-on Roofing, White/Black, Non-homogeneous	LAYER 1 100%	Fibrous Glass Bituminous Matrix/Filler Other Non-Fibrous Material	15% 70% 15%	None Detected	
Asbestos Present: No		Total % Non-Asbestos:		100.0%	Total %Asbestos: No Asbestos Detected	
1522070-008 LL7	Roofing Felt, Gray/Black, Non-homogeneous	LAYER 1 100%	Fibrous Glass Bituminous Matrix/Filler Other Non-Fibrous Material	15% 70% 15%	None Detected	
Asbestos Present: No		Total % Non-Asbestos:		100.0%	Total %Asbestos: No Asbestos Detected	
1522070-009 LL8	Sheet Vinyl, Yellow/Brown, Non-homogeneous	LAYER 1 100%	Vinyl Binder/ Filler	70%	Chrysotile	30%
Asbestos Present: Yes		Total % Non-Asbestos:		70.0%	Total %Asbestos: 30.0%	

Method Detection Limit: Less than one percent (<1%). Asbestos content has been determined using calibrated visual estimation (CVES). Samples tested were received in acceptable condition unless otherwise stated. Test report relates only to items tested. Due to PLM limitations, results on samples with None Detected or samples with low asbestos concentrations may not be reliable and further analysis such as TEM is recommended to confirm PLM results. This report shall not be reproduced except in full without the written approval of this laboratory. This report may not be used by the customer to claim product certification, endorsement, or approval by NIST/NVLAP or any agency of the government. Samples shall be disposed according to local, state and federal laws, 30 days after results are reported.

Analyst - Fred Chappellear

Approved Signatory Cristina E. Tabatt

Lab Code 500044-0

Appendix D

STANDARD FENCE SPECIFICATIONS

The fence shall be a standard chain link fence with a height of six feet. The wiring of the fencing shall be 11 gauge and woven, approximately, into a two-inch mesh. The fencing should have knuckled finish on the top and bottom edges. The posts are to be made of galvanized metal, and shall be spaced no more than ten feet apart. Any access gates are to be constructed of the same material as the fence, and shall be secured with a padlock.