

Appendix F3: Removal Action Closure Report

Appendices

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Department of Toxic Substances Control



Terry Tamminen
Agency Secretary
Cal/EPA

1011 N. Grandview Avenue
Glendale, California 91201

Arnold Schwarzenegger
Governor

November 12, 2004

Mr. Ralph Patterson
Assistant Superintendent
Claremont Unified School District
2080 North Mountain Avenue
Claremont, California 91711

REMOVAL ACTION CLOSURE REPORT, PROPOSED LA PUERTA ELEMENTARY SCHOOL SITE, 2475 NORTH FORBES AVENUE, CLAREMONT (SITE CODE 304393)

Dear Mr. Patterson:

The Department of Toxic Substances Control (DTSC) reviewed the removal action closure (RAC) report dated October 6, 2004, received October 13, 2004 and prepared for the subject site by Environmental Geoscience Services. The RAC report presents the details of the removal action activities completed at the site, in accordance with a DTSC approved Removal Action Workplan (RAW).

This 9.7-acre site has been owned by the Claremont Unified School District, since 1967. A small portion of the site is developed with two school buildings and a temporary class room structure, which are currently unoccupied. The site was used for agricultural purposes at least since 1928 until 1968. It was used as an intermediate school between 1968 and 1978, a private school in 1983 and an adult school from 1988 through the end of 2002. A Preliminary Endangerment Assessment (PEA) investigation revealed elevated levels of arsenic (up to 141 milligrams/kilogram (mg/kg) soil) and total petroleum hydrocarbons (TPH, up to 2,000 mg/kg), predominantly in the northeast corner of the site.

The removal action consisted of the excavation and off-site disposal of contaminated soils. Clean up target goals of 8.68 mg/kg arsenic and 1,000 mg/kg TPH were set for the removal action, based on analysis of the background samples in the vicinity and in consultation with DTSC. At the time of the RAW approval, the consultant estimated that 316 cubic yards (474 tons or 20 truck loads) of contaminated soil would be removed from the site. However, approximately 629 tons (27 truck-loads) of contaminated soil were removed from the site as non-hazardous waste, in order to achieve the clean up objectives. Approximately 354 tons were sent to the Western Waste facility in McKittrick, California. In addition, about 275 tons were sent to the Western Environmental Inc. facility in Mecca, California.

Mr. Ralph Patterson
November 12, 2004
Page Two

Based on the information presented, DTSC has determined that all appropriate response actions have been completed, all acceptable engineering practices were implemented and hereby approves the RAC report. No further removal/remedial action is necessary. The final certification for completion of removal action at this site is enclosed for your records. In accordance with California Education Code, section 17213.2, subsection (e), if, at anytime during construction at a school site, a previously unidentified release or threatened release of a hazardous material or the presence of a naturally occurring hazardous material is discovered, the school district shall cease all construction activities at the site, notify and take actions as required by DTSC.

If you have any questions, please contact Mr. Rao Akula, Project Manager at (818) 551-2847 or me at (818) 551-2821.

Sincerely,



Sharon Fair, Chief
Glendale/Sacramento Branch
School Property Evaluation and Cleanup Division

Enclosure

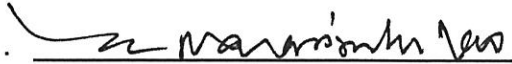
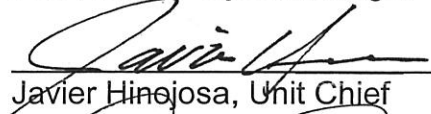
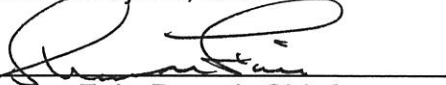
cc: Mr. Jeff Findl, R.G.
Geologist Owner
Environmental Geoscience Services
909 Electric Avenue, Suite 312
Seal Beach, California 90740

Mr. Michael O'Neill
Consultant/Environmental Coordinator
School Facilities Planning Division
California Department of Education
1430 N Street, Suite 1201
Sacramento, California 95814

REMOVAL ACTION CERTIFICATION
Proposed La Puerta Elementary School Site, 2475 North Forbes Avenue,
Claremont

1. Certification of Remedial or Removal Action:

I hereby certify that the following information is true and correct to the best of my knowledge.

1.  11/12/04
Rao Akula, Project Manager Date
2.  11/12/04
Javier Hinojosa, Unit Chief Date
3.  11/12/04
Sharon Fair, Branch Chief Date

2. Certification Statement: Based upon the information which is currently and actually known to the Department,

The Department has determined that all appropriate response actions have been completed, that all acceptable engineering practices were implemented and that no further removal/remedial action is necessary.

The Department has determined, based upon a remedial investigation or site characterization that the site poses no significant threat to public health, welfare or the environment and therefore implementation of removal/remedial measures is not necessary.

The Department has determined that all appropriate removal/remedial actions have been completed and that all acceptable engineering practices were implemented; however, the site requires ongoing operation and maintenance (O&M) and monitoring efforts. The site will be deleted from the "active" site list following (1) a trial operation and maintenance period and (2) execution of a formal written settlement between Department and the responsible parties, if appropriate. However, the site will be placed on the Department's list of sites undergoing O&M to ensure proper monitoring of long-term cleanup efforts.

- 3. Site Name and Location: (Street address, County, City and zip code)**
Proposed La Puerta Elementary School Site
Property at 2475 North Forbes Avenue
Claremont, California 91711

A. List any other names that have been used to identify this site:

None

B. Address of site if different from above:

NA

C. Assessor's Parcel Number 8670-003-90. This parcel number identifies the 18.75-acre property that includes the 9.7-acre La Puerta School site. This certification applies to the school property only.

4. Responsible Parties: (Use extra pages if necessary.)

Name: **Mr. Ralph Patterson**

Title: **Assistant Superintendent**

Firm: **Claremont Unified School District**

Address: **2080 North Mountain Avenue**

City: **Claremont, California**

Zip: **91711**

Telephone: **(909) 398-0602**

Relationship To Site: (such as generator, hauler, etc.)

Current Landowner/Operator: **Claremont Unified School District**

5. Brief Description and History of the Site: (Include previous and current uses of site, a brief description of the cleanup action and concentrations of significant hazardous substances left on site)

This 9.7-acre site has been owned by the Claremont Unified School District, since 1967. A small portion of the site is developed with two school buildings and a temporary class room structure, which are currently unoccupied. The site was used for agricultural purposes at least since 1928 until 1968. It was used as an intermediate school between 1968 and 1978, a private school in 1983 and an adult school from 1988 through the end of 2002. A Preliminary Endangerment Assessment (PEA) investigation revealed elevated levels of arsenic (up to 141 milligrams/kilogram (mg/kg) soil) and total petroleum hydrocarbons (TPH, up to 2,000 mg/kg), predominantly in the northeast corner of the site. The removal action consisted of the excavation and off-site disposal of contaminated soils. Clean up target goals of 8.68 mg/kg arsenic and 1,000 mg/kg TPH were set for the removal action, based on analysis of the background samples in the

vicinity and in consultation with DTSC. Approximately 629 tons (27 truck-loads) of contaminated soil were removed from the site as non-hazardous waste, in order to achieve the clean up objectives. Approximately 354 tons were sent to the Western Waste facility in McKittrick, California. In addition, about 275 tons were sent to Western Environmental Inc. facility in Mecca, California.

6. **Type of Site:** (Check appropriate response)

Included in Bond Expenditure Plan? Yes ___ No N/A

RCRA-Permitted Facility _____ Bond - funded

RCRA Facility Closure _____ RP - funded

*NPL _____ N/A

Federal Facility

Other (i.e., walk-in): _____ Explain Briefly:

7. **Size of Site:** (Based on Expenditure Plan definition of size)

Small ___ Medium X Large ___ Extra Large

8. **Dates of Remedial or Removal Action:**

A. Initiated: **February 5, 2004** B. Completed: **November 10, 2004**

*Per SARA, any NPL site that is not permanently cleaned must be scheduled for a follow-up visit after 5 years to verify that cleanup measures are still satisfactory.

9. **Response Action Taken on Site:** (check appropriate action)

X Removal Action (satisfactory abatement of site)

___ Final Remedial Action

___ RCRA Enforcement/Closure action

___ No action, further investigation verified that no cleanup action at site was needed.

A. Type of Remedial or Removal Action (e.g. Excavation and redisposal, cap, on-site treatment?):

Excavation: Removal of 629 tons of soil

B. Estimated quantity of waste associated with the site (i.e., tons/gallons/cubic yards) which was:

- | | |
|--|--------------------------------|
| 1. <input type="checkbox"/> treated | Amount: |
| 2. <input type="checkbox"/> untreated (capped sites) | Amount: |
| 3. <input checked="" type="checkbox"/> removed | Amount: <u>629 tons</u> |

10. **Cleanup Levels/Standards:**

- A. What were the cleanup standards established by the Department of Toxic Substances Control (DTSC) pursuant to the final remedial action plan (RAP) or workplan (if cleanup occurred as the result of a removal action (RA) prior to development of a RAP)?

8.68 mg/kg for arsenic, 1000 mg/kg for total petroleum hydrocarbons

- B. Were the specified cleanup standards met? Yes No

C. If "no", why not:

11. **DTSC Involvement in the Remedial or Removal Action:**

- A. Did the Department order the Remedial or Removal Action?
Yes No Date of Order

- B. Did the Department review and approve the following plans/procedures? (indicate date of review/approval if done):

<input checked="" type="checkbox"/> Sampling Analysis Procedures	Date <u>April 13, 2004</u>
<input checked="" type="checkbox"/> Health & Safety Protections	Date <u>April 13, 2004</u>
<input checked="" type="checkbox"/> Removal/Disposal Procedures	Date <u>April 13, 2004</u>
<input checked="" type="checkbox"/> Removal Action Plan	Date <u>April 13, 2004</u>

- C. If site was abated by a responsible party, did the Department receive a signed statement from a licensed professional on all phases of the Remedial Actions? (indicate date of statement)

Removal Action Closure Report Date **October 6, 2004**

- D. Did a registered engineer or geologist verify that acceptable engineering practices were implemented?

Yes No Name **Mr. Jeff Findl**

- E. Did the Department confirm completion of all Remedial Actions?

Yes No Date of verification November 10, 2004
(i.e. manifest, sampling, demonstrated installation and operation of treatment)

F. Did the Department (directly or through a contractor) actually perform the Removal Action?

Yes No Name of Contractor: Environmental Geoscience

G. Was there a community relations plan in place? Yes No

H. Was a removal action workplan developed for this site? Yes No

I. Did DTSC hold a public meeting regarding the draft RAW? Yes
No

J. Were public comments addressed?
Yes No Date of DTSC analysis and response:

K. Are all the facts cited above adequately documented in the DTSC files? Yes No

If no, identify areas where documentation is lacking.

12. EPA Involvement in the Remedial or Removal Action:

A. Was the EPA involved in the site cleanup? Yes No

B. If yes, did EPA concur with all remedial actions? Yes No

C. EPA comments

EPA staff involved in cleanup:
(Name, Title)

(Address, Phone Number)

13. Other Regulatory Agency Involvement in the Cleanup Action: N/A

Agency: Activity:

RWQCB
 ARB
 CHP
 Caltrans
 Other

Name of contact persons and agency:

14. Post-Closure Activities: N/A

A. Will there be post-closure activities at this site? (e.g. Operation and Maintenance) Yes ___ No X If yes, describe:

B. Have post-closure plans been prepared and approved by the Department? Yes ___ No N/A

C. What is the estimated duration of post-closure (including operations and maintenance) activities?
N/A years.

D. Are deed restrictions proposed or in place? Yes ___ No X

If "yes", have deed restrictions been recorded with the County recorder?

Yes ___ No ___ Date

If "no", who is responsible for assuring that the deed restrictions are recorded?

Who is the Department contact? **Rao Akula, Project Manager**
Name/Phone Number **818-551-2847**

E. Has cost recovery been initiated? Yes X No
If yes, amount received \$52,123.22 ___ % of DTSC costs.

F. Were local planning agencies notified of the cleanup action? Yes
No

If yes, the name and address of agency:

15. Expenditure of Funds and Source:

(Information to be supplied by Toxic Accounting Unit.)

Funding Source and amount expended:

___ HWCA	\$	___	___ HSA	\$
___ HSCF	\$	___	___ RCRA	\$

____ RP \$ _____ Other \$
____ Federal Cooperative Agreement \$
____ Other (Site Remediation Account)
To be paid by **Claremont Unified School District**

16. **Additional Comments:**

Sandra Jones

From: Jeff Shoemaker [jshoemak@chs.cusd.claremont.edu]
Sent: Wednesday, July 14, 2004 12:48 PM
To: Ralph Patterson
Subject: FW: Update concerning the La Puerta soil excavation work

Ralph, for your review. Please contact me if you would like to discuss further. Thanks, p.s. I have observed Henry's level of service, and ability to answer questions during this process to be very good. J. Shoemaker
 -----Original Message-----

From: Environmental Geoscience [mailto:envgeos@yahoo.com]
Sent: Wednesday, July 14, 2004 12:11 PM
To: Jeff Shoemaker
Subject: Update concerning the La Puerta soil excavation work

Jeff,

As we discussed, I have prepared this message to give you an update as to the status of the soil excavation work at the La Puerta Site.

We completed the initial excavation work on Thursday July 8th. I collected numerous soil samples from the sidewalls and base of the excavation, which were submitted to the laboratory for analysis.

Based on the analytical results, limited additional excavation work is needed to remove several small areas of soil that had detectable concentrations which exceeded our cleanup limits. This includes two areas in the base of the excavation and two areas along the sidewalls of the excavation.

The additional excavation work has been scheduled for Thursday (7/15/04) at 0700. It is anticipated that it will take only one day to conduct this additional excavation work. After this additional excavation work has been completed I will collect additional soil samples to verify that we have removed all soil which exceeds the cleanup limits.

On a side note, the analytical results from the stockpiled soil are within the limits that will allow the soil to be hauled as non-hazardous material. The results are being sent to the landfill for final approval.

If you have any questions, I can be reached at the office at (562) 280-3481 or tomorrow on my cell phone at (562) 761-4153.

Henry Ames

Environmental Geoscience Services
 909 Electric Ave. suite 312
 Seal Beach CA 90740

phone (562) 280-3481 fax (562) 280-3485

Sandra Jones

From: Environmental Geoscience [envgeos@yahoo.com]
Sent: Wednesday, June 30, 2004 4:26 PM
To: Rao Akula
Cc: Jeff Shoemaker; Andy Begun; Ralph Patterson; shane@eee.org
Subject: La Puerta School, Claremont, CA - Soil Excavation Schedule

Rao:

As we discussed this morning, the Claremont Unified School District is ready to start the soil excavation work for the proposed La Puerta Elementary School site. The work will be conducted in accordance with the Removal Action Workplan (dated December 26, 2003), which was approved by the DTSC in a letter dated April 13, 2004.

The first day of field work is scheduled for Tuesday July 6, 2004. We will be conducting our Health and Safety meeting at 0800 and then will commence with the removal of the asphalt parking surface in the area of the planned excavation. The arsenic contaminated soil excavation work will be conducted during Tuesday and Wednesday (7/6 and 7/7).

Excavation verification soil samples will likely be collected on Wednesday afternoon after completion of the excavation work.

I will be onsite during all field activities. If you have any questions during the field work, please call me on my cell phone at (562) 761-4153.

Thank you

Henry Ames

Environmental Geoscience Services

Environmental Geoscience Services
909 Electric Ave. suite 312
Seal Beach CA 90740

phone (562) 280-3481 fax (562) 280-3485

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Department of Toxic Substances Control



Terry Tamminen
Agency Secretary
Cal/EPA

Edwin F. Lowry, Director
1011 N. Grandview Avenue
Glendale, California 91201



Arnold Schwarzenegger
Governor

April 13, 2004

Mr. Ralph Patterson
Assistant Superintendent
Claremont Unified School District
2080 North Mountain Avenue
Claremont, California 91711

REMOVAL ACTION WORKPLAN APPROVAL, PROPOSED LA PUERTA
ELEMENTARY SCHOOL SITE, 2475 NORTH FORBES AVENUE, CLAREMONT
(SITE CODE 304393)

Dear Mr. Patterson:

The Department of Toxic Substances Control (DTSC) received several public comments during the thirty-day public comment period, held from February 23, 2004 to March 23, 2004, for the Draft Removal Action Workplan (RAW) dated December 26, 2003. DTSC issued a response to these comments on April 13, 2004. A copy of the DTSC responsiveness summary is enclosed for your information.

DTSC reviewed the comments received, and after careful consideration, determined the proposed removal action activities are appropriate, after one minor revision. The comments received prompted revision of the truck route, for disposal of the contaminated soil. DTSC hereby approves the RAW with revision of the truck route as described in the responsiveness summary.

It is DTSC's understanding that implementation of the RAW is scheduled to begin on May 3, 2004 and the field activities are expected to last ten days. Please notify DTSC at least 48 hours in advance of commencing fieldwork and/or schedule changes. Upon completion of confirmation sampling activities, a Removal Action Completion Report must be submitted to DTSC for review and approval, before this part of the site may be developed.

As part of the review process, a Notice of Exemption (NOE) is being filed with the Office of Planning and Research to comply with the California Environmental Quality Act requirements for this removal action. A copy of the NOE is enclosed for your information.

Mr. Ralph Patterson
April 13, 2004
Page Two

If you have any questions, please contact Mr. Rao Akula, Project Manager at (818) 551-2847 or me at (818) 551-2821.

Sincerely,



Sharon Fair, Chief
Glendale-Sacramento Branch
School Property Evaluation and Cleanup Division

Enclosures

cc: Mr. Henry B. Ames, R.G.
Senior Geologist
Environmental Geoscience Services
909 Electric Avenue, Suite 312
Seal Beach, California 90740



Department of Toxic Substances Control



Terry Tamminen
Agency Secretary
Cal/EPA

Edwin F. Lowry, Director
1011 N. Grandview Avenue
Glendale, California 91201



Arnold Schwarzenegger
Governor

April 13, 2004

TO WHOM IT MAY CONCERN

RESPONSIVENESS SUMMARY FOR THE REMOVAL ACTION WORKPLAN,
PROPOSED LA PUERTA ELEMENTARY SCHOOL SITE, 2475 NORTH FORBES
AVENUE, CLAREMONT (SITE CODE 304393)

PURPOSE OF THIS DOCUMENT

On February 5, 2004, the Department of Toxic Substances Control (DTSC) approved the draft Removal Action Workplan (RAW) for the subject site, for public comments. The documents relevant to the draft RAW were made available in a public repository (Claremont Public Library) for public review and comments between February 23, 2004 and March 23, 2004. The purpose of the public comment period was to enable public involvement in the environmental cleanup activities, in line with the applicable regulations (Health and Safety Code Sections 25356.1(h) (1) and 25378.7(b)). The purpose of this document is to record the DTSC responses to all the questions raised by the community during this process.

RESPONSES TO COMMENTS FROM PUBLIC DURING THE PUBLIC COMMENT PERIOD

Ten written comments were received during the public comment period. Some of these comments did not require a response (they were statements). DTSC responses to the remaining questions submitted by the community are given below:

Q1) My concern is for the children who need to cross Baseline Avenue coming and going to school. The schools that would be affected are Claremont High school (Indian Hill at Baseline), Condit Elementary (Mountain at Baseline) and may be Summer Elementary and Chaparral Elementary. Recommend: Mail letter's to the parents of children attending these schools encouraging extra caution during this cleanup period. Hold school assemblies at the elementary level with the police department as partners reinforcing walking and bike safety. At Claremont High School, have the home room teachers address safety concerns in class with fliers and pep talk. Look at redirecting the trucks to go east on baseline to merge with the 210 west at the baseline on ramp. This would decrease the impact on the schools and is approximately the same distance from the cleanup site. Please view attached map.

Response: The truck route will be modified to include Forbes Avenue south, Baseline east and then on to 210 freeway. This will address your concerns, since the number of children crossing this revised route will be minimal and there should be no additional outreach requirements. Thank you for your suggestion.

Q2) Where is the need for another school? We in the neighborhood don't see an influx of new homes (not mansions) because of big families who have many children. Are you educating illegals now? Or still? When Proposition 55 passed, was this your plan to build another school with the funds? Property owners, continually, have to foot the bills for education, including books. My husband was an educator for 36 years in the 50s, 60s, 70s and 80s and they were never allotted enough money by the legislators. Why don't you force them to fund more for education? In stead it's always the tax on property. They have been cheating the schools forever. How do you justify this school? Please pass these comments on to the superintendent of the school district.

Response: Your comment has been forwarded to Mr. Ralph Patterson, Assistant Superintendent of the Claremont Unified School District, for consideration.

Q3) The discovery of Toxic Chemicals at the La Puerta site is disturbing. I believe these chemicals pose a risk to the students, even if there is an effort to clean up part of the site, I seriously doubt it is possible to clean a localized region at one corner of the site and still ensure that entire site is safe. Kids like to dig in dirt. They will play in it, get it in their mouths, noses etc. In short, the children will be exposed to toxic chemicals in spite of the clean up effort. The La Puerta Elementary School plan should be stopped. This is NOT an appropriate location for an elementary school.

Response: The identification and determination of the extent of contamination at the proposed La Puerta School site was conducted under DTSC oversight, in accordance with established State regulations. DTSC compares contaminant levels to general background values, considers exposure pathways including direct contact and ingestion in determining the required cleanup targets for removal actions. The cleanup targets are reviewed for adequacy by DTSC toxicologists and geologists. In evaluating the removal actions, DTSC uses measurable carcinogenic as well as non-carcinogenic health risk values, for receptors including children. While toxicologists ensure reliability and adequacy of health risk calculations, geologists ensure that issues pertaining to characterization and movement of the contaminants are addressed properly. The soil sampling at the proposed La Puerta School site was conducted throughout the site, using all available past land use information. The proposed cleanup therefore,

addresses the entire school site. The only area of contamination of potential concern is found to be limited to the northeast corner of the site. The proposed removal action is therefore limited to this corner. The isolation of this area from the rest of the site is intended to ensure parallel school construction activities, while the removal action is conducted with appropriate protective measures. The nature and extent of contamination identified at this site is neither uncommon nor serious enough to preclude a school construction. The removal action will be followed by confirmation sampling to ensure that contaminated soil has been removed and the potential risk has been reduced to levels that are safe for students and faculty.

Q4) I am concerned that clean up be done as outlined with good follow thru and testing after cleanup to show levels are satisfactory.

Response: Yes, confirmation sampling is planned post removal. In addition, please refer to the response to Question 3, for further details on DTSC due diligence.

Q5) I was a student at La Puerta from 1970 to 1972. All of the students that attended La Puerta during the '70s and those that attended the adult school since, do not to my knowledge, have any health problems related to the La Puerta site. We need another elementary school ASAP. The city did not take this into account when they approved the new housing developments at Padua and Mt. Baldy Rd., or the new housing at the "Village West" side.

Response: The environmental investigations conducted at the proposed La Puerta Elementary School site, were in accordance with new state laws, in place since 2000. These laws require DTSC oversight for new school constructions and expansion projects, which utilize Government funding. Even though there were no known health problems in the past due to the subsurface contamination, construction activities related to the new school may require excavations, soil movements and/or different land usage which may increase the risk of potential exposure to the future occupants of the school. DTSC uses established criteria to determine the necessity and extent of removal/remedial actions, where the presence of contaminants have been confirmed. New housing developments do not need to go through similar DTSC scrutiny, but the developers may choose to do due diligence investigations through private consultants.

Removal Action Workplan at the Proposed La Puerta Elementary School Site
April 13, 2004
Page Four

FURTHER INFORMATION

Agency contact list for this removal action is enclosed. If you have any further questions, you may use this list or contact Mr. Rao Akula, Project Manager, at (818) 551-2847 or me at (818) 551-2172.

Sincerely,



Javier Hinojosa, Chief
Schools Unit – Glendale Office
School Property Evaluation and Cleanup Division

Enclosure

cc: Mr. Ralph Patterson
Assistant Superintendent
Claremont Unified School District
2080 North Mountain Avenue
Claremont, California 91711

Removal Action Workplan
Proposed La Puerta Elementary School Site
2475 North Forbes Avenue, Claremont
Agency Contact List

Technical Questions:

Mr. Rao Akula, P.E., Project Manager
Department of Toxic Substances Control, 1011 N. Grandview Avenue, Glendale,
CA 91201, Tel (818) 551-2847, rakula@dtsc.ca.gov

Mr. Javier Hinojosa, Chief, Schools Unit - Glendale.
Department of Toxic Substances Control, 1011 N. Grandview Avenue, Glendale,
CA 91201, Tel (818) 551-2172, jhinojos@dtsc.ca.gov

Health Risk Questions:

Dr. Gerald Chernoff, Staff Toxicologist, Department of Toxic Substances Control,
8810 Cal Center Dr., Sacramento, California 95826-3268, gchernof@dtcs.ca.gov

Dr. Debbie Oudiz, Senior Toxicologist, Department of Toxic Substances Control,
8810 Cal Center Dr., Sacramento, California 95826-3268, doudiz@dtsc.ca.gov

Community Outreach:

Ms. Treva Miller, Public Participation Specialist, Department of Toxic Substances
Control, 1011 Grandview Avenue, Glendale, CA 91201, Tel (818) 551-2846,
tmiller@dtsc.ca.gov

Ms. Randi Jorgensen, PPS Supervisor, Department of Toxic Substances Control,
1011 Grandview Avenue, Glendale, CA 91201, (818) 551-2192, rjorgens@dtsc.ca.gov

Claremont Unified School District Contact:

Mr. Ralph Patterson, Assistant Superintendent, CUSD at 2080 North Mountain Avenue,
Claremont, CA 91711, Tel (909) 398-0602

Information Repository Contacts:

Claremont Public Library, 208 North Harvard Avenue, Claremont, CA 91711,
Tel (909) 621-4902.
DTSC Regional Records Office, 1011 N. Grandview Ave., Glendale, CA 91201,
Tel (818) 551-2800



Terry Tamminen
Agency Secretary
Cal/EPA



Department of Toxic Substances Control

Edwin F. Lowry, Director
1011 N. Grandview Avenue
Glendale, California 91201



Arnold Schwarzenegger
Governor

NOTICE OF EXEMPTION

April 13, 2004

To: Office of Planning and Research
1400 Tenth Street, Room 212
P.O. Box 3044
Sacramento, California 95812-3044

From: Department of Toxic Substances Control
School Property Evaluation and Cleanup Div.
1011 N. Grandview Avenue
Glendale, California 91201

Project Title: Claremont Unified School District, Proposed La Puerta Elementary School, Removal Action Workplan (RAW)

Project Location - Specific: 2475 North Forbes Avenue

City: Claremont

County: Los Angeles

Description of Project:

Background

This 9.7-acre site is owned by the Claremont Unified School District since 1967. A small portion of the site is developed with two school buildings and a temporary class room structure, which are currently unoccupied. The site was used for agricultural purposes at least since 1928 until 1968. The site was used as an intermediate school between 1968 and 1978, a private school in 1983 and an adult school from 1988 through the end of 2002. A Preliminary Endangerment Assessment (PEA) investigation revealed elevated levels of arsenic (up to 141 milligrams/kilogram (mg/kg) soil), predominantly in the northeast corner of the site. In addition, asbestos containing building materials have been identified within the two site structures. The asbestos containing building materials (ACBM) will be removed prior to demolition of the buildings, in accordance with the existing City, county and State regulations. This soil removal action is proposed to address the arsenic contamination, but does not address the removal of the ACBM.

Description of the Removal Action Work Plan

A RAW has been prepared to clean up the contaminated soils underneath the site. The RAW includes necessary details to conduct the excavation, characterization, and disposal of the contaminated soils. The removal action consists of excavation and removal of contaminated soils from the site. A clean up target of 8.68 mg/kg arsenic has been set for the removal action, based on analysis of the background samples in the vicinity and in consultation with the DTSC Toxicologist. Based on the extent of impacted soil as delineated by lab results, it is estimated that 316 cubic yards (474 tons or 20 truck loads) of contaminated soil will be removed from the site. The northeast area will be isolated from the rest of the school site, to conduct the removal action without impacting the construction activities for the school site.

The excavated soil will be stockpiled prior to off-site disposal. The stockpiles will be underlain and covered with plastic sheeting to prevent run-off and/or dust generation. Soil berms will be constructed around the perimeter of the stockpile to contain run-off. The stockpiles will be located within the fenced area. The project site will be unoccupied during the implementation of the removal action. The distance to the nearest residence from the removal action area is estimated to be about 80 feet. Conventional construction equipment, such as a front-loader equipped with a backhoe, will be used to excavate the soil and load the soil into transport trucks. The soil will be excavated with dust suppression procedures in place. Dust suppression will be performed by lightly spraying or misting work areas with water. Air monitoring will be conducted during excavation to ensure that dust suppression control measures are effective.

The estimated project cost for the Removal Action is between \$32,520 and \$72,300 depending on the chosen destination for the excavated soil. The soil will be covered during transport to the disposal facility. Depending on the waste classification results, the removed soil will be sent to a Class I (RCRA Hazardous waste) or Class II (non-RCRA California Hazardous waste) facility at Kettleman City or a Class III non-hazardous waste facility in Palmdale. The truck transportation routes are described in detail in the RAW. These routes were chosen to minimize transportation through residential areas and use freeways where feasible. The proposed route for the transportation of excavated soil in Claremont area will include the following path:

South on Forbes Road, turn east on to Baseline Road and merge on to Westbound CA 210 Freeway. Further directions will depend on the waste classification sampling results and the corresponding chosen destination, as described in the draft RAW.

The site will be secured using temporary fencing to reduce the potential for unauthorized personnel to enter the excavation area. The implementation of the

removal action is planned for May 2004. Final Project sign off, including back-filling, and compacting of excavated areas is expected to be completed by July 2004.

Name of Public Agency Approving Project:

California Environmental Protection Agency, Department of Toxic Substances Control, School Property Evaluation and Cleanup Division, Glendale, California.

Name of Person or Agency Carrying Out Project:

Environmental Geoscience Services, under contract with the Claremont Unified School District (Contact: Mr. Henry Ames).

Exempt Status: Title 14, California Code of Regulations, Section 15330
Minor cleanup actions taken to mitigate, or eliminate the release or threat of release of a hazardous waste.


Reasons Why Project is Exempt:

This project is a minor cleanup action taken to prevent, minimize, stabilize, mitigate, or eliminate the release or threat of release of a hazardous waste or substance which is small removal action costing approximately \$72,300.00 or less. The RAW includes Excavation Plan, Engineering Evaluation/Cost Analysis, Health and Safety Plan, Transportation Plan, Air Monitoring Program, and Dust Control Program. The project will not have a significant effect on the environment because of the relatively small volume, short project duration, and the controlled manner in which contaminated soil will be excavated, loaded onto trucks and taken offsite for disposal/treatment.

Lead Agency Contact Person: Rao Akula

Telephone: (818) 551-2847

Signature:



Sharon Fair, Chief
Glendale-Sacramento Branch
School Property Evaluation and Cleanup Division

Date:

4/13/04



Department of Toxic Substances Control

Terry Tamminen
Agency Secretary
Cal/EPA

Edwin F. Lowry, Director
1011 N. Grandview Avenue
Glendale, California 91201

Arnold Schwarzenegger
Governor

February 5, 2004

Mr. Ralph Patterson
Assistant Superintendent
Claremont Unified School District
2080 North Mountain Avenue
Claremont, California 91711

APPROVAL OF DRAFT REMOVAL ACTION WORKPLAN FOR PUBLIC REVIEW,
PROPOSED LA PUERTA ELEMENTARY SCHOOL, 2475 FORBES AVENUE,
CLAREMONT (SITE CODE 304393)

Dear Mr. Patterson:

The Department of Toxic Substances Control (DTSC) has reviewed the draft Removal Action Workplan (RAW), prepared by Environmental Geoscience Services, dated December 26, 2003 and received on December 26, 2003, for the subject site. The draft RAW presents the proposed removal action activities to address the contamination identified during the Preliminary Endangerment Assessment at the site.

DTSC hereby approves the draft RAW for public review, with one comment. DTSC recommends a removal action objective of 1000 milligrams/kilogram be added for the total petroleum hydrocarbons (TPH). While DTSC concurs that there is no threat to groundwater from the elevated TPH, DTSC recommends removal of TPH contamination for aesthetics and to remove any potential intangible liabilities.

The draft RAW should be placed in the designated information repository, along with the enclosed Draft Notice of Exemption, for the required thirty-day public comment period. The public notice should be placed in the local newspapers and a Fact Sheet, approved in form by DTSC, should be mailed to residents on the site mailing list, to initiate the thirty-day public comment period. Upon completion of the comment period, DTSC will consider any comments and revise the RAW, if necessary, prior to final approval.

Mr. Ralph Patterson
February 5, 2004
Page Two

If you have any questions, please contact Mr. Rao Akula, Project Manager, at (818) 551-2847 or me at (818) 551-2821.

Sincerely,



Sharon Fair, Chief
Glendale-Sacramento Branch
School Property Evaluation and Cleanup Division

Enclosure

cc: Mr. Henry B. Ames, R.G.
Senior Geologist
Environmental Geoscience Services
909 Electric Avenue, Suite 312
Seal Beach, California 90740



Terry Tamminen
Agency Secretary
Cal/EPA



Department of Toxic Substances Control

Edwin F. Lowry, Director
1011 N. Grandview Avenue
Glendale, California 91201



Arnold Schwarzenegger
Governor

NOTICE OF EXEMPTION

February 5, 2004

To: Office of Planning and Research
1400 Tenth Street, Room 212
P.O. Box 3044
Sacramento, California 95812-3044

From: Department of Toxic Substances Control
School Property Evaluation and Cleanup Div.
1011 N. Grandview Avenue
Glendale, California 91201

Project Title: Claremont Unified School District, Proposed La Puerta Elementary School, Removal Action Workplan (RAW)

Project Location - Specific: 2475 North Forbes Avenue

City: Claremont

County: Los Angeles

Description of Project:

Background

This 9.7-acre site is owned by the Claremont Unified School District since 1967. A small portion of the site is developed with two school buildings and a temporary class room structure, which are currently unoccupied. The site was used for agricultural purposes at least since 1928 until 1968. The site was used as an intermediate school between 1968 and 1978, a private school in 1983 and an adult school from 1988 through the end of 2002. A Preliminary Endangerment Assessment (PEA) investigation revealed elevated levels of arsenic (up to 141 milligrams/kilogram (mg/kg) soil), predominantly in the northeast corner of the site. In addition, asbestos containing building materials have been identified within the two site structures. The asbestos containing building materials (ACBM) will be removed prior to demolition of the buildings, in accordance with the existing City, county and State regulations. This soil removal action is proposed to address the arsenic contamination, but does not address the removal of the ACBM.

Description of the Removal Action Work Plan

A RAW has been prepared to clean up the contaminated soils underneath the site. The RAW includes necessary details to conduct the excavation, characterization, and disposal of the contaminated soils. The removal action consists of excavation and removal of contaminated soils from the site. A clean up target of 8.68 mg/kg arsenic has been set for the removal action, based on analysis of the background samples in the vicinity and in consultation with the DTSC Toxicologist. Based on the extent of impacted soil as delineated by lab results, it is estimated that 316 cubic yards (474 tons or 20 truck loads) of contaminated soil will be removed from the site. The northeast area will be isolated from the rest of the school site, to conduct the removal action without impacting the construction activities for the school site.

The excavated soil will be stockpiled prior to off-site disposal. The stockpiles will be underlain and covered with plastic sheeting to prevent run-off and/or dust generation. Soil berms will be constructed around the perimeter of the stockpile to contain run-off. The stockpiles will be located within the fenced area. The project site will be unoccupied during the implementation of the removal action. The distance to the nearest residence from the removal action area is estimated to be about 80 feet. Conventional construction equipment, such as a front-loader equipped with a backhoe, will be used to excavate the soil and load the soil into transport trucks. The soil will be excavated with dust suppression procedures in place. Dust suppression will be performed by lightly spraying or misting work areas with water. Air monitoring will be conducted during excavation to ensure that dust suppression control measures are effective.

The estimated project cost for the Removal Action is between \$32,520 and \$72,300 depending on the chosen destination for the excavated soil. The soil will be covered during transport to the disposal facility. Depending on the waste classification results, the removed soil will be sent to a Class I (RCRA Hazardous waste) or Class II (non-RCRA California Hazardous waste) facility at Kettleman City or a Class III non-hazardous waste facility in Palmdale. The truck transportation routes are described in detail in the RAW. These routes were chosen to minimize transportation through residential areas and use freeways where feasible. The proposed route for the transportation of excavated soil in Claremont area will include the following path:

0.5 miles south on Forbes Road, then west on to West Baseline Road and proceed 1.2 miles to Towne Road, turn south and merge on to Westbound CA 210 Freeway. Further directions will depend on the waste classification sampling results and the corresponding chosen destination, as described in the draft RAW.

The site will be secured using temporary fencing to reduce the potential for unauthorized personnel to enter the excavation area. The implementation of the

removal action is planned for May 2004. Final Project sign off, including back-filling, and compacting of excavated areas is expected to be completed by July 2004.

Name of Public Agency Approving Project:

California Environmental Protection Agency, Department of Toxic Substances Control, School Property Evaluation and Cleanup Division, Glendale, California.

Name of Person or Agency Carrying Out Project:

Environmental Geoscience Services, under contract with the Claremont Unified School District (Contact: Mr. Henry Ames).


Exempt Status: Title 14, California Code of Regulations, Section 15330
Minor cleanup actions taken to mitigate, or eliminate the release or threat of release of a hazardous waste.

Reasons Why Project is Exempt:

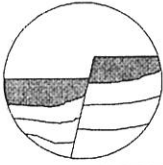
This project is a minor cleanup action taken to prevent, minimize, stabilize, mitigate, or eliminate the release or threat of release of a hazardous waste or substance which is small removal action costing approximately \$72,300.00 or less. The RAW includes Excavation Plan, Engineering Evaluation/Cost Analysis, Health and Safety Plan, Transportation Plan, Air Monitoring Program, and Dust Control Program. The project will not have a significant effect on the environment because of the relatively small volume, short project duration, and the controlled manner in which contaminated soil will be excavated, loaded onto trucks and taken offsite for disposal/treatment.

Lead Agency Contact Person: Rao Akula

Telephone: (818) 551-2847

Signature: 
Sharon Fair, Chief
Glendale-Sacramento Branch
School Property Evaluation and Cleanup Division

Date: 2/5/04



ENVIRONMENTAL GEOSCIENCE SERVICES

909 Electric Avenue, Suite 312
Seal Beach, CA 90740
Phone: (562) 280-3481 Fax: (562) 280-3485

January 20, 2004

Claremont Unified School District
Attn: Ralph Patterson
2080 N. Mountain Ave.
Claremont, California 91711

Subject: **PROPOSAL - REMOVAL ACTION WORKPLAN**
Proposed La Puerta Elementary School Site
2475 North Forbes Avenue
Claremont, CA

Dear Mr. Patterson,

Environmental Geoscience Services (EGS) is pleased to submit this proposal to the Claremont Unified School District for conducting the necessary consulting services associated with the Removal Action Workplan (RAW) for the La Puerta Elementary School site. These proposed services are associated with the ongoing requirements specified by the California Environmental Protection Agency, Department of Toxic Substances Control, School Property Evaluation and Cleanup Division (DTSC) for the proposed school site.

BACKGROUND INFORMATION

The subject property includes approximately 9.8 acres, a portion of which is developed with three buildings which are currently unoccupied. The remaining portion of the site includes a large area of undeveloped land. EGS understands that the Claremont Unified School District intends to renovate and expand portions of the existing adult school and construct several new buildings for an elementary school.

EGS prepared a *Phase I Environmental Site Assessment* (ESA) report, dated August 2002, which documented the current and previous land use and other historical information concerning the site and nearby properties. The findings presented in the ESA identified a recognized environmental concern related to the previous agricultural land use at the site. The DTSC reviewed the ESA and requested that a Preliminary Endangerment Assessment (PEA) be conducted to evaluate if there was an impact to the property from the previous land use. The DTSC approved scope of work for the PEA included the collection and analysis of soil samples from various areas of the property to identify if residual chemicals were present at the site.

EGS conducted the soil sampling work and prepared a Preliminary Endangerment Assessment report, dated August 2003. In general, the findings presented in the PEA report identified that the shallow soil in a limited area of the site contained elevated concentrations of arsenic, which exceeded the acceptable health risk standards. Therefore it was recommended that the arsenic impacted soil be removed from the site prior to initiating the planned site development work.

Based on the findings from the PEA, and in accordance with the DTSC's requirements for school construction sites, various tasks need to be completed prior to initiating the soil excavation work at the site. These tasks include the preparation of a Removal Action Workplan (RAW) and a Community Profile. After the DTSC's approval of the RAW and Community Profile, there is a 30-day public comment period to provide members of the community a chance to comment on the proposed soil excavation and removal work. After the public comments have been considered, then the soil excavation work can begin.

The specific objectives of the services presented herein include the preparation of the necessary documents for submittal to the DTSC so that the soil excavation work can be completed in accordance with the DTSC's requirements. In addition, EGS has included the costs for the oversight of the soil excavation and disposal work as well as the costs for the preparation of a Closure Report for submittal to the DTSC. The Closure Report will describe and document the field work and related activities that were conducted in accordance with the approved RAW. Upon the DTSC's approval of the Closure Report, the DTSC will issue a "No Further Action" letter that will certify that all necessary response actions have been completed in accordance with the approved RAW and that the site conditions do not pose a significant risk to students, staff and faculty at the site.

The scope of work presented herein does not include the services or costs to conduct the excavation work or the services or costs for the transportation and offsite disposal of the arsenic impacted soil.

PROPOSED SCOPE OF SERVICES

EGS has developed a five-task program that describes the proposed services.

- Task 1** – Preparation of a Removal Action Workplan for submittal to DTSC.
- Task 2** – Preparation of a Community Profile for submittal to DTSC.
- Task 3** – Oversight of the excavation work.
- Task 4** – Preparation of Draft RAW Closure and Final RAW Closure Reports.
- Task 5** – Project Management time, including attending meetings with the Claremont Unified School District and the DTSC.

Task 1 - Preparation of Removal Action Workplan

EGS will prepare a Removal Action Workplan (RAW) that includes a comprehensive background section, a description of the selected remedial method, an engineering evaluation/cost analysis, potential federal/state/local regulations associated with the proposed workplan, an excavation plan and a detailed project schedule. Other components of the RAW include a quality assurance project plan, an air and meteorological monitoring plan, a dust control plan, a transportation plan for offsite disposal and a Site Safety Plan.

Task 2 - Preparation of a Community Profile

The Community Profile is a document that presents information concerning the demographics of the area surrounding the proposed school and also the actions taken to involve the community in the planning of the proposed site remediation activities. The work required to complete a Community Profile varies depending on the demographics of the area and the community's level of interest.

In general, an initial survey is mailed to all residences within the proposed school's attendance area to assess the level of awareness and concern associated with the proposed remedial action. If necessary, materials mailed out may need to be translated into one or more languages, depending on the demographics of the community. Another component of the Community Profile involves conducting formal interviews with various community leaders to assess their level of awareness and concern. Based on the responses from the survey and interviews, a level of community interest is determined for the proposed remedial work. If the level of community interest is low, then no additional community outreach would be required. If the level of community interest is moderate additional information (e.g Fact Sheet) would need to be mailed to the community. If the level of community interest is high additional mailings and public meetings would be required. EGS anticipates that the level of community interest for this site will be low to moderate.

All of the information obtained from the community survey and from the interviews will be compiled into the Community Profile that will be submitted to the DTSC for review and approval.

Regardless of the level of community interest, a 30-day public comment period is required to allow interested members of the community a chance to comment on the RAW. A public notice announcing the 30-day public comment period will be published in the local newspaper(s). The public comment period will begin after the DTSC's initial approval of the RAW and Community Profile. Copies of the RAW and Community Profile will be placed in the local library for public review during the comment period. At the end of the comment period, the DTSC will compile the comments received and, if necessary, request changes to the RAW.

Task 3 – Oversight of the Excavation Work

Upon the DTSC's final approval of the RAW, the excavation work can begin. EGS will coordinate with the Claremont Unified School District's excavation contractor to schedule the work. EGS will be onsite at all times during the excavation work to verify that the field work is conducted in accordance with the approved RAW. The proposed EGS activities will include monitoring the soil excavation work, conducting air and meteorological monitoring, dust monitoring and maintaining compliance with the Site Safety Plan.

After the soil has been excavated and stockpiled at the site, EGS will collect soil samples from the excavation. The samples will be analyzed in a laboratory to identify if the remaining concentrations of arsenic exceed the recommended cleanup goals. If necessary, additional excavation work may be necessary to remove the remaining arsenic contaminated soil that exceeds the recommended cleanup goals.

After all of the arsenic contaminated soil has been stockpiled at the site, EGS will collect soil samples from the stockpiled soil. The analytical results from these samples will be used to profile the soil and determine the options for disposal.

After the appropriate disposal location has been selected and approved by the DTSC, EGS will monitor the field activities while the trucks are loaded with the arsenic contaminated soil. EGS will also document the volume of soil removed from the site and also the volume of soil brought to the site to backfill the excavation.

Task 4 – Preparation of Draft RAW Closure Report and Final RAW Closure Report

After the field work has been completed EGS will prepare a draft RAW Closure report that will include an executive summary, introduction, site description, environmental setting, sampling activities and results, conclusions and recommendations. The draft report will be submitted to the DTSC for review. If necessary, the DTSC will request modifications to the draft report. As appropriate, EGS will make the necessary changes and resubmit the report to the DTSC. The RAW Closure report will be signed and certified by a California Registered Geologist.

Task 5 - Project Management

This Task involves the labor time to communicate with the Claremont Unified School District, the DTSC project Manager, the DTSC Public Participation Specialist also attend meetings with the involved parties, as necessary. In addition, EGS anticipates that the Claremont Unified School District may need various letters and other correspondences prepared to address specific issues.

COST ESTIMATE

Based on our current understanding of the site conditions, EGS proposes to conduct the proposed services on a time and materials basis. Please be aware that the cost estimate is based on numerous assumptions and is only a “best estimate” of the labor time needed to provide the specified services.

The estimated labor hours and other costs to complete the proposed services are presented below:

Task Description	Estimated Cost
TASK 1 - Preparation of Removal Action Workplan	
Project Geologist 100 hours at \$90/hour = \$ 9,000 Principal Geologist 10 hours at \$105/hour = \$ 1,050 Drafting 6 hours at \$60/hour = \$ 360	\$10,410
Preparation of Health & Safety Plan	
Project Geologist 20 hours at \$90/hour = \$ 1,800 Principal Geologist 2 hours at \$105/hour = \$ 210	\$2,010
Reproduction and distribution of reports \$ 500	\$ 500 \$ 12,920


Task Description	Estimated Cost
TASK 2 - Preparation of Community Profile	
Prepare and update Project Mailing List Project Geologist 15 hours at \$90/hour = \$1,350	\$ 1,350
Conduct Community Leader Interviews Project Geologist 25 hours at \$90/hour = \$2,250 Conference call services \$100	\$ 2,350
Prepare and Distribute Community Survey (mailed to 1,600 addresses) Project Geologist 20 hours at \$90/hour = \$1,800 English/Spanish translation services = \$200 Printing fees = \$ 800	\$ 2,800
Demographics Report = \$200	\$ 200
Evaluation of Responses from Survey and Interviews Project Geologist 15 hours at \$90/hour = \$ 1,350	\$ 1,350
Prepare Community Profile Report (for submittal to DTSC) Project Geologist 30 hours at \$90/hour = \$ 2,700	\$ 2,700
Prepare and Distribute Fact Sheet (To be mailed to 1,600 addresses) Project Geologist 20 hours at \$90/hour = \$1,800 English/Spanish translation services = \$400 Printing fees \$ 1,000	\$ 3,200 \$ 13,950
TASK 3 - Oversight of the Excavation Work	
Field Work Registered Geologist 30 hours at \$90/hour = \$2,700 Senior Staff Geologist 40 hours at \$85/hour = \$3,400	\$ 2,700 \$ 3,400
Laboratory Analyses Excavation sampling (48 hour turnaround) 42 samples EPA Method 6010 (arsenic only) @ \$ 17.50/sample 42 samples EPA Method 8015 modified @ \$ 65.00/sample Stockpile sampling (48 hour turnaround) 4 samples EPA Methods 6010 (Title 22 metals), 8015 (total petroleum hydrocarbons), 8260 (volatile organic compounds) and 8081 (organochlorine pesticides) @ \$ 575/sample	\$ 735 \$ 2,730 \$2,300
Mileage and Miscellaneous Equipment \$ 1,000	\$ 1,000
Drum Disposal (decon water) \$250	\$ 250
	\$ 13,115

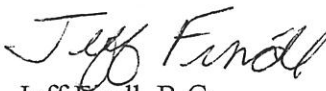
Task Description	Estimated Cost
<p style="text-align: center;">TASK 4 - Preparation of Draft RAW Closure Report & Final RAW Closure Report</p> <p>Project Geologist 40 hours at \$90/hour = \$ 3,600 Principal Geologist 5 hours at \$105/hour = \$ 525 Drafting 6 hours at \$60/hour = \$ 360 Administrative 10 hours at \$50/hour = \$ 500 Reproduction and distribution of reports \$ 500</p>	\$ 5,485
<p style="text-align: center;">TASK 5 - Project Management Time</p> <p>Project Geologist 40 hours at \$90/hour = \$ 3,600 Principal Geologist 5 hours at \$105/hour = \$ 525 Mileage \$ 200</p>	\$ 4,325
TOTAL ESTIMATE (Tasks 1 through 5)	\$ 49,795

The above scope of work will be billed on a time and materials basis with an assigned upper limit of \$ 49,795 which will not be exceeded without your written approval. If the above scope of work and terms are acceptable to you, please issue a Purchase Order.

EGS appreciates this opportunity to provide this proposal to the Claremont Unified School District. If you have any questions or comments regarding this proposal, please call the undersigned at (562) 280-3481.

Sincerely,
ENVIRONMENTAL GEOSCIENCE SERVICES


Henry B. Ames
Senior Project Geologist


Jeff Findl, R.G.
Principal Geologist