



March 23, 2016

VIA EMAIL

Aslam Shareef, Project Manager
Brownfields and Environmental Restoration Program
Department of Toxic Substances Control
5796 Corporate Avenue
Cypress, California 90630

**SUBJECT: ADDITIONAL INFORMATION REQUESTED FOR PHASE I ESA,
PROPOSED CIVITA ELEMENTARY SCHOOL (SITE CODE: 404936)**

Dear Mr. Shareef,

On February 25, 2016, BRG Consulting, Inc. (BRG) received your request for additional information for the Phase I Environmental Site Assessment (ESA) prepared for the proposed Civita Elementary School (Ninyo & Moore, October 19, 2015). Responses were provided on March 11, 2016. Based on the review of the March 11th responses, BRG received your request for additional information related to the Phase I ESA on March 18, 2016. The following presents the questions received and our responses:

Comment 1: “Response to comment #4 indicates that ‘backfilling of former quarry using mining tailings ... information was not found.’ It is not clear whether mine tailings were used as backfill on and/or adjacent to the Site. Please clarify with supporting documentation as necessary. This information is needed in order for DTSC to make a determination on the Phase I ESA document.”

Response: *Subsequent to the approval of the Quarry Falls (Civita) Specific Plan and Tentative Map in 2008, two (2) geotechnical reports were prepared by GeoCon Incorporated (GeoCon) for Units B and C (Lots 1, 2, 3, 4, and 5) of the Quarry Falls (Civita) Specific Plan area in April 2012 and July 2014. These reports, electronic copies of which are attached, are referred to herein as GeoCon 2012 and GeoCon 2014, respectively. The “Geotechnical Investigation - Units B and C Quarry Falls (Civita), April 2012” consisted of a review of published and unpublished geologic literature, a review of compaction reports associated with reclamation grading that has occurred on the property, drilling of 15 borings, soil sampling, laboratory testing, engineering analyses and recommendations. The “Final Report of Testing and Observation Services for Units B and C (Lots 1, 2, 3, 4, and 5), July 2014” presented the results of compaction testing and observation services during grading including observing grading operations and processing of the surface of the existing previously placed fill soils.*

Based on a review of the attached geotechnical reports, fill soil from the former quarry operations was placed on the site and vicinity during reclamation grading activities in 2008-09 and 2011 (GeoCon, 2012 and 2014). The reports state that fill soils at the site and vicinity ranged from less than 5 to 30 feet below ground surface (bgs). A soil boring advanced on the site (LB-4) indicates that approximately 26 feet of fill soil was present in the portion of the site evaluated. However, in 2012/2013 additional grading was performed at the site and vicinity to facility the future planned development. Based upon a review of the grading plans, it appears that grading involved the cuts at the site ranging from approximately 3 to 15 feet

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below ground surface. The source of the fill material is reported as mining tailings from former quarry operations at the Vulcan Materials Mission Valley Plant, which mined sand and aggregate.

Based on experience with the former quarry, the mined materials were sold by Vulcan Materials for use on construction sites throughout San Diego County and the environs. Mining for construction sand and aggregate generally consists of open pit excavation using loaders, excavators, or similar. Most of the mined materials require processing to meet the requirements of specific markets, which typically involves a combination of washers, screens, and classifiers to segregate particle sizes and crushers to reduce oversized material, which may utilize water in the process. Sand and aggregate mining does not utilize chemical extraction processes.

Comment 2: "The Phase I ESA identifies three facilities of potential concern which may have been a part of the Site and adjacent areas. These facilities identified in Table 2 of the document were: (a) Quarry Falls, (b) Cal Mat Company, and (c) Industrial Asphalt. However, the review of the Environmental Database Report (EDR), dated July 27, 2015, Appendix C, indicates the Mission Valley Mobile, located at 5494 Mission Center Road, is currently undergoing remedial investigation. Please provide an update in this case and details on investigation."

Response: *As indicated in the EDR report, the facility at 5494 Mission Center Road is located approximately 1/3-mile southwest of the site at a lower elevation than the site. In addition, the EDR report shows that the release case associated with the site (H13029-001) was closed on July 19, 2011. As indicated on Pages 11 and 12 of the Phase I Environmental Site Assessment (ESA) report, based on the distance from the site, regulatory agency status, and location of the site with respect to groundwater flow, this property is not considered to be an environmental concern to the site.*

Comment 3: "Historical Quarry operations included hazardous material handling, storage, and disposal. Please provide information on where the material was handled, stored, and or disposed of in relation to the site boundary."

Response: *The historical quarry operations included asphalt and concrete plants as well as the use of heavy equipment and vehicles that required fueling and maintenance. The attached map (Quarry Falls Specific Plan Final EIR, Figure 2-7. Existing Site Conditions) shows the locations of the asphalt plant, concrete plant, maintenance area, truck parking area, aggregate processing area, and equipment storage areas with respect to the site, which would be where hazardous wastes would have been handled or stored. The Phase I ESA also states that former underground storage tanks (USTs) and aboveground storage tanks were associated with Cal Mat at 5745 Mission Center Road, which is the concrete plant, and Industrial Asphalt at 8150 Friars Road. As indicated on the figure, these facilities were not located on the proposed school site.*

As stated in Table 3 of the Phase I ESA, the DTSC's Hazardous Waste Tracking System indicates that addresses associated with the former quarry that disposed of wastes were associated with the concrete and asphalt plant addresses (i.e., 5745 Mission Center Road and 8150 Friars Road), which are not located on the proposed school site. The facilities disposed of wastes under manifest including organic solids, alkaline solution; organic residues aqueous solution; unspecified aqueous solution; aged or surplus organics; asbestos containing wastes; solvent mixture; waste oil and mixed oil; oil water separation sludge; and unspecified oil containing waste. These wastes are typical of heavy equipment operations and vehicle maintenance.

Comment 4: "Phase I indicated that cleanup of contaminated soil was conducted on the Quarry historically. Please specify the location where the clean up was conducted in relation to the site boundary. Clarify whether soil gas sampling was performed in the cleanup area."

Response: *As stated in Table 2 of the Phase I ESA, the soil cleanups were related to releases of fuel from former underground storage tanks (USTs) associated with Cal Mat at 5745 Mission Center Road and the Industrial Asphalt facility 8150 Friars Road. As noted in Section 4.1.4 of the Phase I ESA, the location of the USTs associated with 5745 Mission Center Road was 800 feet southwest of the site and the UST associated with 8150 Friars Road was approximately 500 feet south of the site. See Appendix D of the Phase I ESA, County of San Diego Department of Environmental Health for the associated regulatory agency documentation.*

Documentation of soil gas sampling was not found on file; however, the Phase I ESA addressed the potential risk for vapor encroachment in Section 6 of the Phase I ESA in accordance with ASTM 2600-10 Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions. As stated in the report, based on completion of the Vapor Encroachment Screening Matrix, it is presumed unlikely that a vapor encroachment condition currently exists beneath the site.

If you have any questions or comments regarding this matter, please contact Tony Raso (San Diego Unified School District) at 619.770.0293/traso@sandi.net or myself at 619.298.7127 x 102/ christina@brginc.net.

Sincerely,
BRG CONSULTING, INC.



Christina Willis
Vice President

Email Attachments: Geotechnical Investigation - Units B and C Quarry Falls (Civita), April 2012
Final Report of Testing and Observation Services for Units B and C (Lots 1, 2, 3, 4, & 5), July 2014
Map (Quarry Falls Specific Plan Final EIR, Figure 2-7. Existing Site Conditions)

cc: Tony Raso, San Diego Unified School District
Erich Lathers, BRG Consulting, Inc.
Lisa Bestard, Ninyo & Moore
Shahir Hassad, DTSC

