



*Matthew Rodriguez*  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

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



*Edmund G. Brown Jr.*  
Governor

June 17, 2015

Mr. Lee Dulgeroff  
Executive Director  
Facilities Planning and Construction  
San Diego Unified School District  
4860 Ruffner Street  
San Diego, California 92111-152

ADEQUACY OF REVISED DRAFT PRELIMINARY ENVIRONMENTAL ASSESSMENT  
REPORT, CLAIREMONT HIGH SCHOOL, 4150 UTE DRIVE, SAN DIEGO (SITE  
CODE 404864-11)

Dear Mr. Dulgeroff:

The Department of Toxic Substances Control (DTSC) reviewed the revised draft "Preliminary Environmental Assessment Report" (PEA Report) (Ninyo & Moore, April 30, 2015), received on May 1, 2015 and revised with replacement/new pages received on June 12, 2015, regarding the Clairemont High School site (Site). The PEA Report was revised in response to DTSC's e-mail, dated June 2, 2015. The PEA Report presents burned waste investigation results and conclusions based on a health risk screening evaluation.

### Site Background

According to the PEA Report, the Site is an approximate 2.3-acre portion of the 44-acre Clairemont High School property; the Site is comprised of an asphalt-paved parking lot, an adjacent landscaped planter located on the northwest side of Ute Drive, and an undeveloped area, including a canyon slope, located southeast of Ute Drive. Sometime between 1949 and 1953, grading and filling operations appear to have occurred along the southern portion of the school property when grading for construction of the school began in 1957. The Site was developed in approximately 1958 as part of the school and has remained generally developed as at present since that time.

The PEA Report also indicates the Site is the possible location of a former, unconfirmed burnsite (i.e., the Clairemont High School Burnsite or the Brandywine Burnsite) and that burned waste was disposed at the Site from approximately 1949 to 1957, prior to school

construction grading activities. The exact location, volume, and type of wastes dumped and burned at the Site are unknown. The PEA Report describes the waste as typically consisting of glass bottles and jars, broken glass, fused glass, masses of fused and melted glass and metal, bricks, ceramic debris, ashy soils, and lesser amounts of partially burned and often damp paper and plastic debris.

In July 2011, burned waste was encountered during the excavation of utility trenches by the San Diego Unified School District (District); subsequently, the District requested DTSC oversight. To evaluate the extent of contamination and to characterize the burned waste in the parking lot area, samples were collected from 11 exploratory trenches in September 2011. Samples were analyzed for metals, dioxins and furans, polynuclear aromatic hydrocarbons, polychlorinated biphenyls, total petroleum hydrocarbons, organochlorine pesticides, and pH. In December 2011, DTSC received a PEA-Equivalent Report which presented the sampling results.

In August 2013, additional investigation and sampling activities were conducted from 12 exploratory trenches to delineate the extent of burned waste in the parking lot, the landscaped planter area adjacent to the parking lot, and an undeveloped area southeast of Ute Drive. Due to exposed waste material in the planter area, the District installed a temporary fence around the planter area to prevent access in December 2013. In March 2014, DTSC received a draft PEA Report; and in September 2014, February 2015, and May 2015, DTSC received revised draft PEA Reports.

The PEA Report indicates that the human health risk screening evaluation shows risk levels above acceptable levels and concludes that a removal action workplan be prepared to address evaluate potential remedial actions.

#### DTSC Response

DTSC hereby concurs with the adequacy of the PEA Report pending review of the public comment. The District should make the PEA Report available for public review and comment pursuant to Option A (Ed. Code § 17213.1, subd. (a)(6)(A)) as indicated in the PEA Report. During the PEA public comment period, this letter, and the PEA Report should be made available to the public in the information repository. The District's consultant informed DTSC that the planned public comment period is to begin on June 19, 2015.

Immediately after the public comment period and hearing, the District should provide written notification to DTSC of the start and end dates of the public comment period, the date of the public hearing, and all public comments received on the revised PEA Report.

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If you have any questions regarding the project, please contact Ms. Christine Chiu, DTSC Project Manager, at 714.484.5340 or [christine.chiu@dtsc.ca.gov](mailto:christine.chiu@dtsc.ca.gov) or me at 714.816.1978 or [yolanda.garza@dtsc.ca.gov](mailto:yolanda.garza@dtsc.ca.gov).

Sincerely,



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ka/cc/yg

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Schools Evaluation and Brownfields Cleanup Branch Reading File