Franklin-McKinley School District

Facilitating Naturally Occurring Asbestos (NOA) Remediation in Urban Settings

C.A.S.H. Annual Conference
Thursday, February 26, 2004
Sacramento, CA

Franklin-McKinley School District

Larry Aceves, Superintendent Franklin-McKinley School District

- Introduction of Panel
- Overview of Ramblewood Park Elementary School Project

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C. John Dominguez, Vice-President School Site Solutions, Inc.

3723 Kenwood Way
Roseville, CA 95747
916-257-2534
Fax 916-652-3450
john@schoolsitesolutions.com

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SSS

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Coordination of the Site Approval Process

- Early coordination of all players
- Recognize the need for safety analysis early
- Site Constraint Evaluation
- Begin Phase One Immediately. Site Review stage
- Conception to Completion. Establish timelines early
- Know the approval process and how it applies to your project including site package submittal

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Working with the DTSC on NOA Sites

- Knowledge of the process/School District as the Lead Agency
- DTSC Schools Unit/School District/LEA Relationship
- DTSC Project Manager & Toxicologist Contact Information
- Holiday's and Vacation Backup
- Weekly/Biweekly Communication -School District - LEA /Environmental Consultants/Architect
- Project Coordinator Essentials

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Thomas F. McCloskey, R.G., C.E.G.

LOWNEY ASSOCIATES
Environmental/Geotechnical/Engineering Services

405 Clyde Avenue
Mountain View, CA 94043
Phone 650-967-2365 ext. 114
Fax 650-967-2785
tmccloskey@lowney.com

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Mitigation of Naturally Occurring Asbestos (NOA) Hazards

Testing
Regulatory required plans
Removal action practices
Dust monitoring
Capping considerations
Keys to success

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Testing

- Use PLM methods on *most* rock samples
- Use TEM methods on soil and air samples
- Use lab with a proven track record
- Spend the extra money on lab analysis to avoid later grief!

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Regulatory Agency Required Plans

- Removal Action Workplan (RAW) or Remedial Design and Implementation Plan (RDIP) if removal > $2 million
  - Health and Safety Plan
  - Dust Mitigation Plan
  - Storm Water Pollution Prevention Plan
  - Cost Estimate
  - Operation and Maintenance Agreement
  - Operation and Maintenance Plan

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Additional Removal Action Workplan Components

- Identification of Removal Alternatives
- Removal Action Alternative Evaluation
  - Overall protection of human health and the environment
  - Compliance with State and Federal requirements
  - Long-Term Effectiveness and Permanence
  - Reduction of Toxicity, Mobility, and Volume
  - Short-Term Effectiveness
  - Implementability
  - Cost
  - Regulatory Agency Acceptance
  - Community Acceptance
  - Removal Action Alternative Selection

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Additional Removal Action Workplan Components (continued)

- Applicable or Relevant and Appropriate Requirements
  - Public Participation
    - Community Survey
    - Community Profile Report
    - Community Concerns
    - Public Participation Activities
- ***Removal Action Implementation Description***
- Project Schedule

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Removal Action Practices

- Water to control dust
- Sweep trucks after loading (common hazmat practices)
- Rinse trucks, wet loads, and cover loads prior to leaving site
- Street sweeping
- Protect storm drains

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Dust Monitoring

- Total Dust
- Personnel air sampling
- Perimeter air sampling
- Provision to reduce monitoring frequency

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Capping Considerations

- Cap all disturbed rock and fills
- Consider capping undisturbed rock as well
- Use colored indicator between cap and NOA
- Consider installing utilities corridors
- Consider depth of post-capping excavations
- Cover all fills composed of NOA rock
- Be cautious in using on-site soils
- Carefully screen import soils for capping

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Keys to Success

- High level DTSC involvement
- Total support from school district
- Project Coordinator
- Consultant experience with DTSC requirements

Larry Aceves, Superintendent
Franklin-McKinley School District

- Closing Remarks