

Draft Preliminary Work Plan

Sampling and Clean-up of Lead Contaminated Soils in Residential Properties Surrounding Exide

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1 Introduction

1.1 Purpose of the Draft Preliminary Work Plan

California's Environmental Protection Agency's Department of Toxic Substances Control (DTSC) is the lead agency tasked with overseeing the sampling, testing, and cleanup of lead contaminated soil at residential properties surrounding the former Exide Technologies (Exide) Battery Recycling facility (Facility) located at 2700 Indiana Street in Vernon, California (see Figure 1) in accordance with California Health and Safety Code Division 20, Chapter 6.8 and other applicable laws. Recently, California Governor Edmund G. Brown Jr. requested \$176.6 million to fund expedited and expanded testing and cleanup of residential properties, schools, child daycare centers, and parks within a 1.7 mile radius of the Exide Facility. This funding will also allow DTSC to accelerate removal of contaminated soil at properties that have the highest lead levels and greatest potential exposure to residents. The purpose of this Draft Preliminary Work Plan (Plan) is to provide an overview of the DTSC's current sampling and remediation efforts and detail how these efforts will be expanded and expedited to achieve the goals articulated in Governor Brown's request.

1.2 Sampling 10,000 Properties

DTSC has overseen the collection and laboratory analysis of several thousand soil samples, some from as far as four and one-half miles from the Facility. A preliminary statistical analysis of this data shows that a roughly circular area radiating about 1.7 miles from the Exide Facility may have been impacted with lead from its past emissions. This area is identified herein as the "Preliminary Investigation Area" or PIA (see Figure 2). Information from the Los Angeles County Assessor's Office suggests that approximately 10,000 residential zoned properties lie within the PIA. This Plan describes DTSC's current sampling procedures and proposed plans to expedite sampling efforts.

1.3 Cleanup of Highest Priority Properties

To date, DTSC has directed and overseen sampling of over 600 residential properties within the PIA. DTSC has established a three-tiered prioritization approach (i.e., Priority 1, 2, or 3) to rank properties for soil cleanup based on lead concentrations in soil and the presence of sensitive receptors (i.e., children and pregnant women). Under this protocol, Priority 1 or P1 Properties are cleaned up first. Approximately 25 percent of the properties sampled to date have been categorized as P1 properties. As a result DTSC estimates that within the PIA as many as 2,500 properties may be categorized as High-Priority or P1 properties. A discussion of DTSC's prioritization protocol is described later in this document.

2 Background

2.1 Exide Facility Background

The Exide Facility occupies a total area of approximately 15 acres located in the City of Vernon, California. This Facility was established as a lead recycling facility in 1922 by Morris P. Kirk & Sons. Earliest Facility operations included recycling lead acid batteries in addition to aluminum, lead, zinc and scrap metal. National Lead (currently NL Industries) acquired Morris P. Kirk & Sons, Inc. in 1953. In 1979, Gould Inc. (Gould) acquired the Facility from National Lead and maintained operations until 1983. In the early 1980s, Gould Inc., constructed an entirely new battery processing and recovery facility and demolished the older recycling facilities at the Facility. At or about the same time, all recycling and smelting operations not associated with lead recycling ceased. In 1983, GNB Technologies (GNB) bought the Facility from Gould. GNB operated the Facility from 1983 through September 2000. In September 2000, Exide Technologies acquired GNB, including the Vernon facility. Exide has owned and operated the Facility since September 2000.

2.2 Previous Investigations

In February 2002, Exide and DTSC executed a Corrective Action Consent Order (CACO) that required the company to proceed, through the Resource Conservation and Recovery Act (RCRA) Corrective Action Process, to investigate and address environmental impacts associated with their historic operations. The CACO required Exide to investigate subsurface soils and groundwater beneath the Facility; these efforts are on-going. In addition, the CACO required Exide to evaluate the offsite effects of past releases of airborne lead. Offsite investigations started with the sampling of dust, soil, and sediment adjacent to the Facility and extended out radially first to 4,500 feet, then 7,500 feet, and finally to 4.5 miles from the facility along prevailing dominant wind directions. Based on these studies, and air modelling studies conducted by South Coast Air Quality Management District, DTSC ordered Exide to begin sampling residential yards starting with those nearest the facility.

The sampling began in an area identified as the Initial Assessment Area (Fig. 2), which comprises of 219 residential properties, and subsequently moved beyond to an area referred to as the Expanded Area. The owners of 186 homes in the Initial Assessment Area granted Exide access to clean up their properties, and Exide completed the cleanup of those homes in November 2015. Exide sampled 146 properties in the Expanded Area to study the extent of lead contamination.

The Expanded Area Investigation Report, prepared by Exide concluded that there is not a clear pattern of diminishing concentrations as investigations moved away from the facility.

In August 2015, DTSC prepared and distributed a presentation titled *“Preliminary Analysis of Soil Data: Distribution of Exide’s Lead Emissions in Soil”* (Preliminary Analysis). This Preliminary Analysis looked at the available soil sampling data from within a 4.5 mile radius and included two statistical approaches and a correlation analysis of signature (or marker) metals typically associated with emissions from

battery recycling facilities, to estimate the geographical extent of Exide's contribution to lead in soils surrounding the Facility. Based on these studies, DTSC estimates that Exide's emissions may have impacted soil as far as 1.3 to 1.7 miles from the Facility. While this analysis is a preliminary finding, it is the most comprehensive analysis regarding the Exide's impacts to the surrounding communities to date.

3 Overview of PIA

3.1 Basis of the PIA

As stated above, DTSC has determined that Exide's emissions may have impacted soil with lead as far as 1.7 miles from the Facility. In order to conservatively identify all residential properties potentially affected, DTSC began within an area described by a 1.7 mile radius around the Facility, and from that baseline, extended the target area outward to major roadways. The result was a roughly polygon shaped Preliminary Investigation Area shown on Figure 2.

3.2 Types of Properties within the PIA

The PIA includes approximately 10,000 residential properties, 28 public and private schools, 9 parks, and nearly 80 childcare facilities (a number of which are located at residential, church, and school properties already sampled).

4 Investigation Process

4.1 Outreach

DTSC anticipates sampling up to 1,500 residential properties by the end of the current fiscal year (FY 15/16). To accomplish this goal, DTSC identified three Focus Areas that are situated along the three predominant wind directions: one to the north, one to the east, and one to the south. Focus on these areas allows DTSC to optimize its outreach efforts and remediate properties with the highest potential for exposure before moving farther away from the Facility.

In November 2015, DTSC mailed 2,800 letters to residents in the Focus Areas asking them for permission to sample their properties. DTSC is currently sampling and cleaning up properties in these Focus Areas while also accommodating property owners outside of the Focus Areas, but within the Preliminary Investigation Area as current funding and resources permit.

DTSC is also pursuing partnerships to reach out to renters and property owners individually and obtain access agreements for sampling and cleanup. The goal of this initiative is to empower community members to take part in this critical cleanup effort. DTSC's pilot program involves two community-based organizations to canvas neighborhoods door to door and gather Access Agreements, and to make people aware of the DTSC's cleanup efforts, inform them about steps they can take to reduce exposure to lead, and to urge families to sign up for blood lead testing.

DTSC has also emphasized the importance of testing exterior lead-based paint at each property, because cleaning up yards without addressing this potential on-going source of lead may result in the recontamination of yards. While DTSC does not have the authority to abate or remove lead-based paint on structures, DTSC has urged Los Angeles County to provide information to homeowners, guidance and resources to address lead-based paint.

Additional information regarding the Exide Facility is shared on DTSC's website [www.dtsc.ca.gov], which includes but is not limited to the following:

1. Weekly Status of Residential Investigation and Cleanup Progress
2. Map of the Preliminary Investigation Area (PIA) with the Focus Areas
3. Property Owner Access Agreements in English and Spanish
4. Tenant Access Agreements in English and Spanish
5. Work Notice for the neighborhood
6. Information on Lead and Health, Blood Lead Testing Program
7. Frequently Asked Questions and responses

4.2 Access Agreements

DTSC's ability to continue sampling and cleanup of residential properties is dependent on timely acquisition of Access Agreements. Access Agreements are forms that must be signed by tenants or property owners before testing for lead can commence. DTSC has developed two types of Access Agreements:

1. Owner — owner of the property signs the "Property Owner" Access Agreement to give permission for lead testing and cleanup if it is needed.
2. Tenant/Non-property owner— the tenant signs the "Non-Owner" Access Agreement. If cleanup is needed, the property owner will need to sign the Owner Access Agreement.

By signing the Access Agreement, the property owner or tenant/non-property owner agrees to provide access for sampling and, if needed, for cleanup. DTSC will provide at least ten (10) business days advance notice to the resident before beginning activities on the property and will provide the resident with copies of any analytical results obtained from samples taken. This grant of access to the property terminates after DTSC completes the sampling and /or cleanup activities.

Access Agreements are available on DTSC's website were mailed out to residents in the Focus Areas, and will be mailed to residents of additional Focus Areas identified in the future. DTSC has also made Access Agreements available at public meetings and local events.

To meet the FY 15/16 goal of sampling 1,500 properties and then to effectively ramp up to sample up to 10,000 properties in the next two years, DTSC is working on a comprehensive Community Engagement Plan that includes:

1. An incentive program to encourage residents to refer their neighbors
2. Increasing the number of local partners and community-based organizations in door-to-door canvassing
3. Partnering with local governments to sponsor community and volunteer events
4. DTSC intends to cluster investigative sampling events to the extent feasible. Using this approach, DTSC hopes to increase sampling efficiency and reduce sampling costs per property.

Task 1 - Access Agreements

- Develop RFQ for access agreement/canvassing contract
- Award contracts for access agreements/canvassing
- Develop Comprehensive Community Engagement Plan as outlined above with contractor assistance

Contractor requirements for this type of work include successful completion of training to use an X-ray Fluorescence (XRF) device and successful completion of soil sampling protocols, pursuant to Title 17, California Code of Regulations, Division 1, Chapter 8. Contractors should also be able to hire local individuals who are trained to conduct such sampling and to subcontract to local businesses who hire such local individuals who have such training.

4.3 Tracking Process

DTSC is maintaining the Access Agreements in an electronic database. After a signed Access Agreement is received, the property owner or tenant is contacted to schedule an initial meeting and sampling. The sampling schedule is updated on a daily basis and transmitted to the sampling team leads.

A Management Information System (MIS) with a GIS interface is currently being developed for the long-term solution for tracking Access Agreements, sampling, and cleanup. This system will be populated by DTSC and DTSC's contractor, and maintained by DTSC.

As part of the output for the system, reporting of the metrics will be real-time and available to the public. Metrics include a breakdown of the number of:

- Access agreements that have been signed and collected
- Total properties sampled
- Properties by Priority Level (i.e. 1, 2, 3, or No Cleanup Required)
- Total properties cleaned up

These metrics can be broken down and reported on the web-interface by city (Vernon, East L.A., Boyle Heights, Commerce, Maywood, Bell, and Huntington Park) as local governments and residents are interested in obtaining metrics only for their respective cities.

Task 2 - Data Management

- Standardize current system and improve usability
- Train analysts and technical staff to track, manage, and process data
- Oversee file management and document control
- Announce RFPs and/or utilize internal resources for database development and maintenance

4.4 Sampling

4.4.1 Description of Current Efforts

Using two four-person crews, each crew completes three properties per day for a total of 30 properties/week. Samples are collected and analyzed in the field using a portable X-ray Fluorescence (XRF) device. A lead-based paint survey is completed after soil sampling. Soil samples and, if observed, flaking paint samples are collected and sent to a California certified laboratory for analysis. The project cost for sampling is approximately \$2,000/property. Total allocated cost for 1,500 properties is \$3 million, which, at current funding levels (\$3,000,000), will provide for characterization of about 900 properties. DTSC is working with contractors to reduce per property sampling costs.

4.4.2 Expanded Efforts

DTSC's increase in workload based upon receiving the funds requested by the Governor is projected below:

- Present day to June 30, 2016:
 - Move from 30 to 60 properties per week
 - Completing between 1,500 and 2,000 properties
 - Contractor cost \$2,000-\$3,000/property = \$3.0 to \$6.0 million.
- July 1, 2016 to September 30, 2016:
 - Move from 60 to 200 properties per week
 - Completing between 720 and 2,400 properties
 - Contractor cost \$2,000/property = \$1.44 to \$4.8 million.
- October 1, 2016 to December 31, 2016:
 - Continue 200 properties per week
 - Completing 2,400 properties
 - Contractor cost at \$2,000/property = \$4.8 million.
- January 1, 2017 to June 30, 2017:
 - Continue 200 properties per week
 - Completing the remaining 3,200-5,380 properties

- Contractor cost at \$2,000/property = \$6.4 to \$10.76 million).

Total Projected Properties Sampled by June 30, 2017: approximately 10,000

Total Contractor Cost: \$20 to \$23 million

Task 3 – Expand and Accelerate Sampling Efforts

- Amend existing sampling contracts for time and money
- Direct contractors to increase number of sampling teams
- Procure additional sampling contracts as needed to place up to 20 sampling crews in the PIA

4.5 Data Analysis and Prioritization

The sampling process is addressed in detail in the Sampling Workplan¹ and will be implemented at each of the residential properties sampled in the PIA.

All soil samples will be analyzed in the field using XRF instruments as described in EPA Method 6200 (EPA, 2007). EPA Method 6200 (EPA, 2007) is a standard analytical method that guides the use of field portable XRF instruments.

Following XRF analysis, two of the soil samples with the highest lead concentrations from each property will be submitted for fixed laboratory analysis. Soil samples will be submitted to a designated analytical laboratory accompanied by chain-of-custody documentation. The laboratory will be certified in the state of California and certified by the Environmental Laboratory Accreditation Program (ELAP). All soil samples are analyzed for lead, antimony, arsenic, cadmium, copper, and zinc, using EPA Method 6010B. DTSC will send samples to laboratories in batches no fewer than two times a week. DTSC will work with laboratories to help ensure they expeditiously process these samples, and will emphasize that DTSC needs the analytical results within three weeks of the samples being submitted to the laboratory.

The lead-based paint testing for this sampling effort is proposed as a preliminary screening approach. No published strategies currently exist for field XRF testing at commercial, industrial, school, public buildings, or soil testing. The intent is to provide a screening of potential lead-based paint on the exterior of structures, if paint is in a deteriorating state, and to the extent that it might affect the nearby soil.

¹ http://www.dtsc.ca.gov/HazardousWaste/Projects/upload/2015-11-18_PIA002_Final-Sampling-Plan.pdf

4.5.1 Providing Sampling Results to Tenants and Owners of Properties

Generally, DTSC will provide XRF readings (preliminary results) to the tenant or owner when they are present at the time of sampling, if the analysis occurs at the property. If the XRF analysis occurs offsite or the resident is not present, the preliminary results will be shared with the resident within three days of the sampling event.

Following DTSC receipt of the confirmation analysis, a review of all the data is completed and a report is prepared. The final sampling results and report will be provided to the resident and/or owner within six weeks of the date on which the sampling event occurred.

4.5.2 Prioritization Protocol

All analytical results are reviewed by DTSC staff, and properties are prioritized so those with the highest levels of lead and risk of exposure to sensitive populations are addressed first.

Priority 1 (Highest Priority)- is assigned when a single soil sample from the uppermost depth interval (0 to 3 inches) has a lead concentration greater than or equal to 1,000 mg/kg. Other considerations for prioritization within Priority 1 include the following:

1. Children seven years of age or younger and pregnant women reside on the property
2. Bare soils are accessible on the property
3. Resident exhibits an elevated blood lead level (>5 ug/dL)

Priority 2 (Moderate Priority)- is assigned when a single soil sample from the uppermost depth interval (0 to 3 inches) has a lead concentration greater than or equal to 400 mg/kg. Priority 2 properties will be elevated to a Priority 1 status if children under seven years of age and/or pregnant women and bare soils are present.

Priority 3 (Low Priority) – is assigned to any property with a statistical average of lead in soil is above 80 mg/kg but less than 400 mg/kg. Priority 3 properties will be elevated to a Priority 2 status if children under seven years of age and/or pregnant women and bare soils are present.

No Cleanup required - is assigned to any property with a statistical average of lead in soil below 80 mg/kg. No soil cleanup is required for these properties.

Task 4 – Prioritization Procedures

- DTSC Staff will develop and implement procedures for prioritizing and detailed tracking of contactor sampling and cleanup efforts

4.6 Notification to Property Owner/Tenant - Priority, 1, 2, or 3

Notification to the tenant and/or property owner consists of:

- A cover letter from DTSC indicating priority level of the property
- A brief description of the soil results and reasoning for priority level
- Maps showing where the soil and lead-based paint samples were collected
- Tables showing soil results and lead-based paint result data
- Copy of the analytical report from the laboratory

Task 5 – Outreach

- The new DTSC Outreach Unit will prepare materials, and track and conduct outreach efforts as specified above

4.7 Expanding Focus Area

In order to meet the FY 15/16 goal of sampling 1,500 properties and effectively ramp up comprehensive community engagement, DTSC will engage other community-based organizations to canvas neighborhoods and gather Access Agreements. DTSC will establish a local government coordination group to meet by phone or in-person on a regular basis. DTSC anticipates that this group will discuss local issues related to communications and outreach regarding the sampling and cleanup.

Additionally, DTSC is developing contact points (e.g. information repositories or local offices) for community members to speak with DTSC staff to obtain information and responses to their questions. Contact points can include libraries, community centers, schools, churches, and shared space in government and community buildings.

5 Cleanup Process

Several activities are needed to successfully complete cleanup of a lead impacted property. These activities include:

Scheduling: Coordinate and schedule cleanup with the property owner if sampling establishes that the property is a Priority 1. Conduct a pre-excavation meeting with the property owner to describe the sample results as well as the removal and restoration activities to be performed, including interior cleaning. Discuss protection of property, yard fixtures, number of home occupants, and post remediation restoration options (e.g. mulch or sod).

Pre-mobilization: Provide work notices to the residents and surrounding community. Train on-site workers on public outreach and communication. Secure all necessary permits (e.g. grading, drainage,

encroachment, lane closure, sidewalk closure). Mark utilities in and around planned excavation areas. Conduct photographic documentation before start.

Mobilization: Mobilize equipment, sanitary facilities and supplies to prepare for cleanup activities. Provide notice with signage and hotline information for neighborhood concerns. Install temporary fencing and erosion control materials.

Excavation and soil handling: Conduct pre-excavation meetings. Abide by health and safety procedures. Establish work zones including excavation, excavated soil staging area, and truck loading area. Mark excavation areas and depths not to exceed 18 inches and include considerations such as measures to protect established shrubs, trees and identified utilities (e.g. hand excavations). Include dust suppression methods, air monitoring, and erosion control measures. Utilize mini-excavators and bobcats for excavation and loading of impacted soil. Use equipment for soil compaction.

Transport and disposal: Utilizing excavation equipment, load excavated soil from stockpile(s) into trucks (after disposal facility approves profiling of waste material) located on top of plastic sheeting. Water will be sprayed if necessary during loading to minimize dust and any excess water will be collected and transported to an authorized offsite facility. Use dry decontamination methods on transport trucks and excavation equipment to remove caked on soil followed by vacuuming to prevent track out and potential spread of contamination. A high-efficiency particulate arrestance (HEPA) vacuum will be used where residual impacts may be present on hardscape areas. Transportation of loads of California hazardous waste or non-hazardous waste occurs under appropriate documentation (i.e., manifests). DTSC will determine the appropriate places that waste materials can be shipped during the process of finalizing cleanup plans.

Confirmation Sampling: Samples are collected after soil removal from the bottom of the excavation to confirm the cleanup has been achieved and that the impacted soil has been removed.

Property Restoration: Material will be sampled before use as backfill. Topsoil placement, mulch, or sod placement are options provided to the property owner. The property owner is encouraged to schedule post remediation interior cleaning.

Closure Report: A report documenting all project activities is provided for each property. This document may include signed access agreements, all laboratory reports, hauler record, hazardous waste manifests, bills of lading, and individual property costs.

5.1 Rate of Cleanup

Current funding provides for cleanup of up to 50 properties under the approved implementation Remedial Work Plan and addendum to the Negative Declaration by June 30, 2016. To date, DTSC through its contractor and their respective subcontractors has completed soil cleanup at 14 properties with two interior cleanings. DTSC's contractor uses and maintains a Microsoft Access database to keep

DTSC constantly informed of the status of sampling and cleanup efforts. A standard of 80 mg/kg at the 95 percent upper confidence level is the target used or when the maximum depth below ground of 18 inches is reached. Total funding allocated for cleanup of the first 50 properties is \$3,000,000 through June 30, 2016.

5.1.1 Expanded Efforts

The following schedule and budget is designed to achieve the objective of remediating up to 2500 properties identified as Priority 1:

- Present day to June 30, 2016:
 - Accelerate from 2 to 4 properties per week
 - Completing between 50 to 82 properties
 - Contractor cost at \$50,000/property = \$2.5 to \$4.1 million.
- July 1, 2016 to September 30, 2016:
 - Accelerate to 10 properties per week
 - Completing between 60 and 120 properties
 - Contractor cost at \$50,000/property = \$3.0 to \$6.0 million.
- October 1, 2016 to December 31, 2016:
 - Accelerate to 20 properties per week
 - Completing between 120 and 240 properties
 - Contractor cost x \$50,000/property = \$6.0 to \$12.0 million.
- January 1, 2017 to June 30, 2017:
 - Accelerate to 30 properties per week
 - Completing 720 properties
 - Contractor cost \$50,000/property = \$36 million
- July 1, 2017 to December 31, 2017:
 - Continue at 30 properties per week
 - Completing 720 properties
 - Contractor cost at \$50,000/property = \$36 million.
- January 1, 2018 to June 30, 2018:
 - Cleanup 35 properties per week
 - Completing 840 properties
 - Contractor cost at \$50,000/property= \$42 million.

Total Projected Properties Cleaned up by June 30, 2018: up to 2,500

Total Contractor Cost: \$125 million

Task 6 – Expand Cleanup

- Expand and Accelerate Cleanup/Restoration Efforts
- Amend existing cleanup/restoration contracts for time and money,
- Direct contractors to increase number of cleanup crews teams
- Procure additional cleanup/restoration contracts as needed place up to 30 cleanup/restoration crews in the PIA

5.1.2 Environmental Review and Mitigation

The Governor’s plan proposes to maintain extensive public participation, and environmental analysis and protections by complying with the Carpenter-Presley-Tanner Hazardous Substance Account Act (State Superfund Law) (HSC § 25300 et seq.), including, but not limited to:

- Extensive public outreach (surveys, public participation plan, interviews, and meetings), information (draft plan, analysis, factsheets, including bilingual information), and involvement in decision making (incorporate or respond to comments); and
- Consideration of cleanup alternatives that protect public health and the environment, as well as the potential for impacts on communities (such as traffic, parking, and air pollution), and the effectiveness of actions to mitigate such impacts.

Section 25356.1 of the California H&SC sets forth the requirements governing the development of Remedial Action Plans (Cleanup Plans) for contaminated sites in California. Under Section 25356.1(d), Cleanup Plans must be based on Subpart E of the National Oil and Hazardous Substances Pollution Contingency Plan, and include all of the following factors:

- Health and safety risks posed by the conditions at the site, considering available scientific data and reports related to the site;
- The effect of contamination or pollution levels on present and foreseeable future land uses of the contaminated, polluted or threatened resources;
- The effect of alternative cleanup measures on these contaminated or threatened resources, including the effect of treatment;
- Site specific characteristics, including surface and subsurface conditions that could affect the offsite migration of contaminants, and preexisting conditions;
- Cost-effectiveness of the alternative measures, including short and long term costs, and the effect the timing of the cleanup has on both costs and impacts; and
- The potential environmental impacts of the alternative cleanup measures.

Section 25356.1(e) requires the Cleanup Plan to include an analysis of all measures considered, and the basis for selection of the measures selected as well as those rejected. The Cleanup Plan must also evaluate consistency with applicable federal regulations, and consideration of responsible parties.

While the cleanup process for properties is uncomplicated (remove contaminated soil, replace with clean fill, restore landscape, and clean interiors), the large number of cleanup sites presents challenges. The State Superfund law provides a process to assure protection of human health and the environment in such cases, including evaluating alternative cleanup methods and evaluating and mitigating potential impacts on human health and the environment, . The expedited cleanup project will be designed and implemented to address traffic concerns, air emissions, and dust control and other potential health or environmental concerns.

DTSC has used various safeguards to protect the public and the environment during the hundreds of past cleanups around Exide's facility (some are listed below).

- Dust suppression activities while working at properties
- Air monitors to detect dust
- Sealing windows and vents on properties as an added precaution
- HEPA vacuuming exterior surfaces that come into contact with contaminated soil
- Cleaning equipment to remove contaminated material and dirt
- Covering trucks that transport soil on public roads
- Relocating residents during cleanups
- Interior cleaning of residences following the removal of contaminated soil

DTSC continues to analyze impacts to the public and the environment, such as traffic impacts, and can use its authorities under the State Superfund Law to help mitigate such impacts.

5.1.3 Public Participation

DTSC will conduct extensive public participation in complying with the State Superfund law (See HSC §§ 25356.1, 25358.7 and 25358.8), including:

- Circulating the draft plan for at least 30 days for public comment
- Notifying affected local and state agencies of the project actions and publishing public notices in the community
- Holding public meetings with the lead and responsible agencies that include an assessment of the degree of contamination, the characteristics of the hazardous substances, an estimate of the time required to carry out project actions, and a description of the proposed actions
- Developing and sharing a public schedule of activities
- Notifying the community of public meetings regarding the project, and providing the public with the opportunity to attend and participate
- Conducting a baseline community assessment to identify community concerns, networks, communications channels, effective outreach tools and timing of information

- Developing a public participation plan that outlines DTSC’s outreach commitments related to each phase of the investigation and cleanup
- Distributing information through the mail and other applicable communications channels on a regular basis and as key milestones approach
- Translating key documents and providing interpretive services at meetings and other forum
- Public noticing decision-making documents, opening comment periods for written comments, and conducting formal public meetings to collect verbal public comments
- Producing and distributing work notices to alert neighborhoods of upcoming fieldwork
- Updating the public participation plan as necessary
- Providing access to information pursuant to the California Public Records Act

In addition, DTSC will conduct further outreach including:

- Supporting diverse forums for community engagement, including advisory and coordination groups
- Providing funding for a community technical advisor
- Maintaining an project web page
- Engaging the news media, particularly Spanish media, to inform the community about the project
- Creating and distributing information in a variety of formats, including video, on-line, and print
- Conducting workshops, public meetings, open houses, health fairs and other forums to ensure the community is informed and able to participate in the decision-making process

5.1.4 Coordination with Local Governments

DTSC will establish a Local Government Coordination Group comprised of representatives from all local governments within the PIA. This area includes the County of Los Angeles and the cities of Los Angeles, Commerce, Maywood, Vernon, Bell, and Huntington Park. Some of the issues this group will address include public outreach and education; blood lead testing and public health information; the provision of funds for the targeted abatement of lead-based paint at homes that meet the criteria for cleanup; and the expediting of local permits for required cleanup activities.

The County of Los Angeles has already allocated \$2 million to assist DTSC in sampling properties within the PIA, and has also directed public health staff to provide residents with blood lead testing resources and general health information. The City of Los Angeles is allocating significant staff time and resources to assist in public engagement, leveraging local financial incentives for drought tolerant landscaping, and providing support for sampling activities. Other local governments have hosted public meetings and continue to provide additional support.

5.1.5 Project Milestone Tracking:

Appropriate project scheduling including the defining of milestones, frequent communications, use of information technology (IT) resources and reporting to interested stakeholders will assist in monitoring progress toward achieving goals.

5.1.6 Contractor Requirements for Cleanup Work

Contractor requirements for this type of work include, but are not limited to, successful completion of Hazardous Waste Operations and Emergency Response (HAZWOPER) training, and training in contaminated soil removal, dust mitigation, sampling, and other activities required to conduct cleanups. Contractors should also be able to hire local individuals who are trained to conduct such cleanup work and to subcontract to local businesses who hire local individuals who have such training.

5.2 Closure Report

Closure reports will be prepared for each property cleanup. These reports will include the following:

- Description of project activities
- Signed Access Agreements
- Laboratory and field soil data
- Hauler records, trucking records, and other field documents
- Costs documentation for future cost recovery efforts

6 Staffing and Resources Organization

6.1 Workforce Development and Job Training Program

DTSC is collaborating with communities, local governments, nonprofit organizations, legislative offices, and other agencies on engagement strategies to explore the creation of programs that promote public health and support the local economy.

In order to meet the demands and timeline for the expedited residential cleanup, DTSC proposes to assist in the expansion of the skilled labor force available to perform required functions. Approximately \$1.2 million of available funding will be used to develop a DTSC Workforce Development and Job Training Program (WDJT) in partnership with experienced workforce development programs and training partners. The goal of WDJT is to provide environmental skills, health and safety training, and support for job placement to community members affected by lead contamination. This program will empower community members to successfully move into short-term jobs related to the lead cleanup efforts that would otherwise be filled by workers outside these communities, as well provide long-term job opportunities in the environmental field.

DTSC is proposing a program similar to the United States Environmental Protection Agency's (U.S. EPA) Brownfields Workforce Development and Job Training program, which helps prepare people for green

jobs that reduce environmental contamination and provide more sustainable futures for the communities most affected by solid and hazardous waste contamination. U.S. EPA has funded its job-training program for years in many states including California.

Topics for this program will focus on building skills specific to environmental remediation and the Exide cleanup including: soil sampling; excavation and removal of contaminated soils; XRF operation; HAZWOPER training and certification; restoration of yards with landscaping; and interior cleaning. The objective is for DTSC contractors to be able to recruit a pre-qualified and trained skilled-labor force, while preparing future community members to participate in expedited cleanup efforts.

The WDJT program will be a concrete investment in the community that will provide immediate benefits related to the Exide cleanup and also have a lasting effect on the local economy by increasing technical job skills of local residents.

6.1.1 Outreach, Recruitment, and Assessment

Led by a selected workforce development partner and community partners, DTSC's outreach, recruitment and assessment program will involve community outreach to recruit low-income young adults and community members from the communities affected by Exide. Pre-qualified and trained community graduates will be available for recruitment and job placement by DTSC contractors.

6.1.2 Technical and Basic Skills Training

Led by selected training partners, this phase will involve training similar to U.S. EPA's Environmental Workforce Development and Job Training Program, including, but not limited to, health and safety, environmental remediation, lead awareness, basic literacy and math, job readiness and resume development, interviewing skills, social skills and services, and additional support needed for meeting employer required qualifications.

The goal of the workforce development and job training program is to provide environmental remediation technical skills to community members affected by Exide's contamination, empowering them to successfully move into short-term jobs related to the Exide cleanup efforts, and ultimately to long-term job opportunities in the environmental field. Topics for this program will focus on building skills specific to environmental remediation and the Exide cleanup, including: soil sampling; excavation and removal of contaminated soils; restoration of yards with landscaping; and interior cleaning. Specific classes include:

- 8-hour Lead Awareness Training
- 40-hour HAZWOPER Certification
- 32-hour Asbestos Abatement Certification
- 24-hour Lead Abatement Worker Certification
- CPR/First Aid Certification
- Cal/OSHA General Industry Standards Certification



- 32 hours Mold Remediation (techniques and methods for cleanup)
- 8 hours of Lead Renovation, Repair and Painting
- Interior Cleaning Protocol Training
- XRF Equipment Operator Certification
- X-Ray Radiation Safety Training

6.1.3 Employment and On the Job Training

Led jointly by selected training partners and DTSC Contractors, this phase will assist successful graduates of the Workforce Development Training curriculum with placement into paid on-the-job training and employment opportunities. The program will establish case management and support services to both employers and trainees to maximize retention and success.

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