# 14.05 Environmental Procedures

## 1.0 Purpose

This Policy and Procedure is to provide direction to the OAR for reporting, recording, tracking and resolving environmental issues during construction.

## 2.0 Procedures

The following list of associated guidance documents addresses various environmental issues typically encountered during construction:

- Facilities Policies and Procedures, Section 17.01.01 *(Hazardous Materials) Environmental Consultant Management Procedures for Buildings and Structures Identified for Demolition Asbestos and Lead Material Management (Existing Facilities)*
- Disposal Procedures for Hazardous Waste & Universal Waste – OEHS REF-4149.2,
- Facilities Policies and Procedures, Section 14.21.01 *A Demolition Procedures Management* located at http://mo.laschools.org/policies-procedures/
- Facilities Policies and Procedures, Section 17.01.01 *Asbestos and Lead Environmental Consultant Management* located at http://mo.laschools.org/policies-procedures/
- Facilities Policies and Procedures, Section 17.01.02 *Asbestos and Lead Material Management* located at http://mo.laschools.org/policies-procedures/
- Facilities Policies and Procedures, Section 17.01.03 *Polychlorinated Biphenyls (PCBs) Material Management* located at http://mo.laschools.org/policies-procedures/
- Specification - *01 7416 Stormwater Pollution Prevention Plan (Revised December 2020)* located at *https://www.laschools.org/new-site/asset-management/guide-specifications*
- Specifications – *01 4524 Environmental Import/Export Material Testing (Revised July 2021)* *https://www.laschools.org/new-site/asset-management/guide-specifications*

NOTE: The above list should not be considered a complete list. The Office of Environmental Health and Safety (OEHS) should be contacted at (213) 241-3199 if any uncertainty exists as to the proper course of action relating to environmental issues.

## 3.0 Scheduled Environmental Procedures

The following procedures summarize the requirements for the management of on-site abatement of asbestos, lead, PCBs, Soil Environmental Assessments, and other hazardous materials. Refer to *Facilities Policies and Procedures, Section 17.01.01 Asbestos and Lead Environmental Consultant Management* and *Facilities Policies and Procedures, Section* 17.01.02 *Asbestos and Lead Material Management* located at http://mo.laschools.org/policies-procedures/ for detailed procedures.

## 3.1 Asbestos and Lead Procedures

After Contract Award, the Facilities Environmental Technical Unit (FETU) or the FETU Environmental Consultant, and OEHS are required to be in attendance at the Job Start Meeting. The Job Start Meeting must include a discussion of what impact the asbestos and lead containing materials will have on the Project, as identified in the Phase 1 Assessment Report and the Phase 2 Abatement Design prepared by FETU or the Environmental Consultant and included in the Bidding Documents. A schedule for the asbestos

and lead abatement work is to be established at the Job Start Meeting. The OAR is responsible for ensuring that all abatement activities are included in the milestones schedule.

The Contractor is not permitted to schedule abatement work with the abatement contractor directly, even when the abatement contractor is working as a subcontractor. All abatement work is to be scheduled through FETU and the Environmental Consultant, with correspondence copied to FETU and OEHS, to ensure that the abatement portion of the project will have appropriate oversight.

Once abatement work is complete, the Environmental Consultant will notify the Contractor, FETU, and OEHS (OEHSConstruction@lausd.net) in writing that the asbestos and lead related work area is clear to occupy. The Contractor is not permitted to access the area impacted by abatement until notice is given that the area has been cleared by the Environmental Consultant, and the isolation and warning signs have been removed by the abatement contractor.

At the completion of abatement for each separate impacted area, the environmental consultant is to notify, in writing, the OAR, FETU, and OEHS that the asbestos abatement and lead related construction work is complete so the area can be approved for regular occupancy by FETU and OEHS.

At the completion of all abatement work the Environmental Consultant is to provide FETU verification that all work anticipated to disturb asbestos and lead has been properly handled and managed according to regulatory requirements and District standards. FETU will be provided close-out documents by the Environmental Consultant verifying that all abatement work was performed according to FETU-approved specifications. Upon review and approval by FETU staff, Close-out Reports are uploaded to LAdocs and are available for OEHS review.

## 3.2 PCBs and Soil Environmental Assessments

After successful selection of a Contractor for the removal of PCBs or toxic soils, the OAR will distribute the Contractor's submitted schedule to the Project Manager for use in scheduling the Environmental Consultant's abatement oversight activities which includes disposal provisions.

A Job Start Meeting will be scheduled by the OAR and attended by the OAR, OEHS and the Contractor, abatement contractor, Complex Project Manager, and Site Administrator to discuss hazardous materials abatement requirements. Refer to *Construction Management Policy and Procedures 14.08 Project Start-up* for additional information.

Once the containment is removed from the work area and the area receives a final inspection, and is determined to be clear, the Environmental Consultant will notify the FETU and the Contractor that the area is suitable for general access. The OEHS will be notified prior to any re-occupancy.

An *Abatement Final Clearance for Demolition Report* (*Exhibit A*) will be submitted to the FETU by the Environmental Consultant when the abatement work is concluded, and the Environmental Consultant approves the work. The Clearance Report will be reviewed by the FETU, for lead and asbestos information to confirm that the Work required in the Phase I Assessment Report(s) and the conclusions discussed in the Clearance Report are consistent. If determined to be complete, the Clearance Report will be forwarded to the OAR. Demolition of the abated work area will commence only after the OAR receives the approved Clearance Certification.

Upon the completion of asbestos and lead abatement for **ALL** structures intended for repair and modernization or demolition at a school site, the OAR shall forward a letter to the FETU listing all property parcels by APN numbers that have received final clearances. The FETU shall then prepare and forward to the OAR the Approval for Request to Advertise form required by Facilities Services (FS) prior to the submittal of the bid package for construction.

FETU, or FETU's designated Environmental Consultant will coordinate with OEHS to secure a United States Environmental Protection Agency (EPA) Site ID Number for hazardous waste disposal. The ALSU

Environmental Consultant will sign the form, on behalf of the Owner, and then transmit a copy to OEHS for approval. After receipt of OEHS approval, the Environmental Consultant will notify the OAR that the manifest is satisfactory and the hazardous waste can be released for transportation.

**NOTE: No hazardous waste shall leave the project site until the manifest is approved by OEHS.**

If required, the Environmental Consultant will continue to monitor hazardous materials disposal manifesting activities to conclusion. When the Environmental Consultant receives the signed manifest from the accepting facility, the Environmental Consultant will prepare a final Phase 3 Report that closes out the hazardous materials work at the Project site. The Environmental Consultant must send the final, clean copy of the manifest(s) to OEHS.

## 4.0 Unanticipated Environmental Conditions (Buildings)

The purpose of this section is to outline the environmental construction response in the event of an unanticipated environmental condition, occurring outside of the Scope of Work of any material previously identified in the Asbestos or Hazardous Materials Report, during building demolition or repair and modernization.

If an unanticipated environmental condition is discovered or disturbed, the contractor shall stop work in the affected area and notify the Inspector of Record (IOR) and/or OAR.

The IOR or the OAR will notify OEHS in accordance with the *OEHS Construction Response Contact List* (*Exhibit B*) and the OAR. If the condition is discovered after normal working hours, the IOR and/or Contractor shall contact School Police at (213) 625-6631.

The OAR shall also notify the Complex Project Manager (CPM), Environmental Consultant, FETU, and the Regional Construction Director.

The Contractor is responsible to report the incident to the Owner Controlled Insurance Program (OCIP) using the SAF-3 form that is found in the *LAUSD Construction Safety Standards* located in the *Construction Policy and Procedures 14.09 Construction Safety Exhibit B* no later than **24 hours** after the occurrence.

The Contractor is to immediately issue written notice to the OAR of the incident's start and finish. The OAR is responsible for logging and tracking the resolution actions and documentation until the incident is resolved.

## 5.0 Unanticipated Environmental Conditions (Site)

The purpose of this section is to outline the environmental construction response in the event of an unanticipated environmental condition occurring on the Project site outside any buildings or structures.

If an unanticipated environmental condition is disturbed or discovered during excavation the Contractor shall stop work in the affected area and notify the IOR and/or the OAR.

The IOR and/or the OAR will notify OEHS in accordance with *OEHS Construction Response Contact List* (*Exhibit B*) and the OAR. If the condition is discovered after normal working hours, the IOR and/or contractor shall contact School Police at (213) 625-6631.

The OAR shall also notify the CPM, Environmental Consultant, FETU, and Regional Director/Regional Project Manager.

The Contractor is responsible to report the incident to OCIP using the *LAUSD Construction Safety Standards* SAF-3 form located in the *Construction Policy and Procedures 14.09 Construction Safety* no later than **24 hours** after the occurrence.

The Contractor is to immediately issue written notice to the OAR of the incident's start and finish. The OAR is responsible for logging and tracking the resolution actions and documentation until the incident is resolved.

Typical conditions encountered that would require notification:

- Underground Storage Tank
- Stained and/or odorous soil
- Chemical (typically petroleum) odor
- Brick cistern (possible septic tank)
- Drums
- Free liquid other than water
- Transite pipe
- Insulated pipe
- Significant trash and debris
- Water/oil well casing
- Clarifiers
- Hydraulic lifts
- Elevator pits
- Elevator cylinders and casings

## 6.0 Environmental Procedures for the Disposal of Hazardous Waste

Scheduled and nonscheduled Hazardous waste, other than Asbestos and Lead, shall be handled on site per the directions of the Environmental Consultant, FETU, and OEHS. The disposal of Hazardous waste shall follow the procedures established in the *Disposal Procedures for Hazardous Waste & Universal Waste – OEHS REF 4149.2 (Exhibit C).*

The Environmental Consultant will coordinate with the OEHS to secure United States Environmental Protection Agency (EPA) ID Numbers for Hazardous Materials Disposal. The Environmental Consultant will sign the official transporting documents such as hazardous and/or non-hazardous waste manifest, bill of lading on behalf of the Owner, and then transmit a copy, via email to hazwaste@lausd.net , for OEHS approval.

The Environmental Consultant, after receipt of OEHS approval, will notify the OAR and the IOR that the manifest is satisfactory and hazardous waste can be released for transportation. The manifest is to be completed and signed on site prior to off-site transportation and disposal.

**NO HAZARDOUS WASTE SHALL LEAVE THE PROJECT SITE UNTIL THE MANIFEST HAS BEEN APPROVED BY OEHS.**

## 7.0 Post Demolition Soil Sampling

Post demolition soil sampling may be necessary to ensure that demolition debris contamination, due to asbestos, lead or other hazardous materials, has not impacted soil at the work area(s). The OAR is responsible for coordination of post demolition soil sampling activities and the subsequent submittal and review of required reports to OEHS and the designated OEHS Site Assessment Project Manager.

## 8.0 Environmental Procedures Import and Export of Soils Materials

The requirements for import/export of earth materials are discussed in LAUSD *Specification Section 01 4524 Environmental Import/Export Materials Testing*. Requests for a variance from *Specification Section 01 4524* may be considered by OEHS for certain import virgin materials and export soil quantities of less than 10-cubic yards. In general, the contractor is to retain the services of a licensed professional (Civil Engineer or Geologist) and an independent State-certified laboratory to sample and test for the

requirements of *Specification Section 01 4524 – Environmental Import/Export Materials Testing*. Import and export soil shall be tested at a frequency as specified in *Specification Section 01 4524*.

To request a variance from OEHS for testing of export material, the OAR should send an email to OEHS requesting variance from soil analytical testing per *Specification Section 01 4524* and describe the source of the soil; the volume of soil; include a representative picture or pictures of the soil stockpile; and include a narrative confirming that no staining, odors, or construction debris are present at the soil stockpile. OEHS will review and provide concurrence, if applicable. Also, the soil should be placed on, and covered with poly sheeting pending off site transport. The Contractor shall submit the request for variance for review and approval at least 72-hours prior to scheduled export.

If the site does not require either export/import, then the requirements of *Specification Section 01 4524* shall not apply, however they are still required to be included in the Bidding Documents.

If the soil is generated from activities on site:

is less than 10 Cubic Yards (CY), and if it shows no discoloration or odor (i.e., evidence of contamination), and has been granted a variance by OEHS:

- the soil can be disposed of as construction waste with OEHS approval.
- the soil can be reused on site as long as it is placed under asphalt- or concrete-paved locations to be redeveloped.
- the soil cannot be spread in tree wells, planters, bare soil areas, or landscaping, unless the soil has been sampled and approved for re-use by OEHS.

is more than 10 CY:

- the soil must be sampled following *Specification Section 01 4524*. Following a review of the analytical data set OEHS will determine whether or not the soil can be:
    - reused on site if it is placed under asphalt- or concrete-paved locations to be redeveloped.
    - spread in tree wells, planters, bare soil areas, or for landscaping purposes.
    - exported to another LAUSD site.
- the soil can be reused on site if it is placed under paved areas. If soil is discolored or has odor, it cannot be reused and must be sampled prior to export following *Specification Section 01 4524*.
- the soil cannot be spread in tree wells, planters, bare soil areas, or landscaping, unless it has been sampled and approved by OEHS for reuse.
- Otherwise the soil will be exported to a State-permitted disposal facility.
- A letter of acceptance for the soil must be obtained from the State-permitted disposal facility that accepts the soil. A signed manifest or bill of lading, whichever applies, will suffice for export of soil to State-permitted landfills.

is imported from another school site:

- The soil must have been sampled and approved by OEHS, and a bill of lading prepared for transport of the soil from the donating school.
- and is impacted, the soil must be disposed as per *Specification Section 01 4524*.
- and is acceptable for reuse at a school site per *Specification Section 01 4524*, no letter of acceptance is required if the soil is exported from one school to another; a bill of lading is required.

The State-certified independent testing laboratory shall perform the required tests and report results of all tests and quality assurance/quality control results to the California licensed professional. The licensed professional shall prepare a certification report stating that the tests were conducted under the responsible charge of the licensed professional and the material tested in accordance with requirements of *Specification Section 01 4524*. Copies of the report are to be submitted to the OAR, IOR, OEHS, Architect/Engineer, contractor, and DSA projects under DSA jurisdiction. These documents are to be maintained at the Project site for New Construction and at the Local Maintenance & Operations Office for Repair & Modernization Facilities. All export manifests must be approved by the OEHS Environmental Compliance Program Administrator.

**NO EARTH MATERIALS SHALL BE IMPORTED OR EXPORTED WITHOUT PRIOR APPROVAL BY OEHS.**

## 9.0 Storm Water Pollution Prevention Plan

The contractor is responsible for the preparation, implementation and monitoring of a Storm Water Pollution Prevention Plan (SWPPP) for the purpose of preventing the discharge of pollutants from the project site into receiving waters. This includes the elimination of pollution discharges such as improper dumping, spills or leakage from storage tanks or storage areas.

The Contractor shall submit to the OAR within 14 days after the effective date of the contract, an electronic copy of the *Storm Water Pollution Prevention Plan (SWPPP)* as required in complying with SWPPP, *Specification Section 01 7416 and 01 7418*, and the storm water pollution regulations for the specific project site. The Contractor's SWPPP submittal for sites with land disturbance of one or more acre(s) or part of a larger project of 1 or more acres shall include an application fee made payable to: ***State Water Resources Control Board.*** Where land disturbance is less than one acre and not part of a larger project, *Specification Section 01 7416* shall be used. Any Best Management Practices (BMP) indicated in the California Storm Water Quality Association (CASQA) BMP Handbook required to prevent or minimize storm water pollution shall be implemented at no cost to Owner.

The OAR is responsible for submitting the plan to the District's Architectural & Engineering Services (A & E) for obtaining the necessary regulatory approvals for the Contractor's SWPPP. The OAR is also responsible for transmitting the approved plan and or comments back to the Contractor. No progress payment request will be accepted from the Contractor until the SWPPP has been submitted and approved. Any incidents of SWPPP non-compliance (spills, leaks, etc.) shall be reported to OEHS and Architectural & Engineering Services.

The Inspector of Record (IOR) is responsible for verifying that site monitoring is performed and is to acknowledge the contractor's inspections by signing the Site Monitoring Reports.

The District Legally Responsible Person (LRP) is responsible for certifying all SWPPP Project Requirement Documents (PRD) to the State Water Resources Control Board (SWRCB).

Prior to Substantial Completion the Contractor shall submit to the OAR the Site Monitoring Reports, SWPPP revisions, Compliance Certifications, post-construction BMP maintenance information, and related documents. Post-construction storm water operation and the management plan as mentioned in the compliance certifications are to be considered in place at Final Completion

## 10.0 Exhibits

Exhibit A Final Clearance for Demolition
Exhibit B OEHS Construction Response Contact List
Exhibit C Disposal Procedures for Hazardous Waste & Universal Waste – OEHS REF-4149.2, Revised June 2020
Exhibit D Glossary of Terms and Meanings

Note: All references to the General Conditions (GC) shall refer to Contract Documents Section 00 7000 (General Conditions). If there is a different version of the Contract Documents that is not reflected in this Policy and Procedure, then all references shall be to comparable provisions of said document.