Ninyo & Moore
Geotechnical and Environmental Sciences Consultants

MASTER
COMMUNITY HEALTH AND SAFETY PLAN
BELL JUNIOR HIGH SCHOOL LANDFILL
620 BRIARWOOD ROAD
SAN DIEGO, CALIFORNIA
REGIONAL BOARD CASE NO.: 9000000916
AND BOARD ORDER NO. 97-11
GEOTRACKER GLOBAL ID: L10007828563

PREPARED FOR:
San Diego Unified School District
Physical Plant Operations
4860 Ruffner Street
San Diego, California 92111

PREPARED BY:
Ninyo & Moore
Geotechnical and Environmental Sciences Consultants
5710 Ruffin Road
San Diego, California 92123

November 16, 2011
Project No. 105338070

Ninyo & Moore
Geotechnical and Environmental Sciences Consultants

November 16, 2011
Project No. 105338070

Mr. Loren Chico
San Diego Unified School District
Physical Plant Operations Annex
4860 Ruffner Street
San Diego, California 92111

Subject: Master Community Health and Safety Plan
Bell Junior High School Landfill
620 Briarwood Road
San Diego, California
Regional Board Case No: 9000000916 and Board Order No. 97-11
GeoTracker Global ID: L10007828563

Dear Mr. Chico:

Ninyo & Moore is pleased to submit this Master Community Health and Safety Plan for the above-referenced site. The intent of the Community Health and Safety Plan is to protect the public and surrounding land uses from potential health hazards during future on-site grading, excavation, trenching, or other construction activities that involve disturbing subsurface materials. This plan will be used in addition to a site-specific Health and Safety Plan, which is intended to protect on-site workers from hazards during such activities, and the Master Soil Management Plan (prepared under separate cover).

Sincerely,
NINYO & MOORE

Lisa Bestard, REA
Senior Project Environmental Scientist

Beth S. Abramson-Beck, PG 4580
Principal Geologist

AO/LB/BAB/gg

Distribution: (1) Addressee
(1) Mr. Jacquelyn Adams; City of San Diego, Local Enforcement Agency,
1010 Second Avenue, Suite 600, MS 606L, San Diego, California 92101

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1. INTRODUCTION

This Master Community Health and Safety Plan (CHSP) provides measures to protect the public and surrounding land uses from potential health hazards during future on-site construction-related activities performed at 620 Briarwood Road in the city and county of San Diego, California (Figure 1). This plan is intended to serve as a master document and shall be implemented during future construction related activities on the site performed by or on behalf of the San Diego Unified School District (SDUSD) that involve disturbing subsurface materials within or outlying the assumed waste footprint and at locations within approximately 1,000 feet outward from the assumed waste footprint. Work performed under this plan shall be in compliance with the project specifications, a site-specific health and safety plan (HASP) to be prepared by the contractor or agency performing the work, the site Soil Management Plan (SMP) (Ninyo & Moore, 2011b), and applicable state, local, and federal statutes and regulations.

A detailed project description, site map indicating the location of proposed work, and a list of contact names and phone numbers will be prepared for each new project and submitted along with this plan and the Master Soil Management Plan (Ninyo, 2011b) to the City of San Diego, Solid Waste Local Enforcement Agency (LEA) for their review and approval prior to conducting subsurface construction activities at the site.

2. SITE DESCRIPTION

The site is located east of Briarwood Road on a bluff with descending slopes to the north, west, and south. The northern portion of the site is occupied by Bell Junior High School which includes classrooms, administration buildings, service buildings, storage buildings, utility buildings, asphalt-paved parking lots, athletic fields, and landscaped areas. The central area of the southern portion of the site is the location of the Bell Junior High School Landfill, which is also known as the Sweetwater II Landfill. A site plan with the surrounding area and assumed waste footprint is presented as Figure 2.

The following information is provided regarding key project contacts:

Site Contact:	Mr. Loren Chico SDUSD Physical Plant Operations Annex 4860 Ruffner Street San Diego, California 92111 (858) 573-5731
Contractor/Agency Performing the Work:	To be determined
Site Health and Safety Manager (SHSM):	To be determined
Community Health and Safety Manager (CHSM):	To be determined
Oversight Agency:	City of San Diego, LEA 1010 Second Avenue, Suite 600 MS 606L San Diego, California 92101 Contact: Ms. Jacquelyn Adams (619) 533-3689

3. PROPOSED PROJECT ACTIVITIES

Future work at the site that would require implementation of this plan includes construction-related activities that involve disturbing the subsurface materials at the site including but not limited to grading, slope stabilization and maintenance activities, additional subsurface excavation/trenching activities associated with site modernization or site assessment activities.

This plan should be submitted to the LEA for their review and approval prior to conducting sub-surface construction activities at the site with a description of the proposed construction activities and a map identifying the location of the proposed work. The project description should also identify the name and contact information for the contractor or agency performing the work, the SHSM, and the CHSM.

4. SITE BACKGROUND AND HISTORY

The site was the location of a solid waste landfill that was operated from approximately 1962 to 1967 by the County of San Diego on property owned by the SDUSD. The types of wastes received are not known, but are believed to have been municipal solid wastes. Following closure of the landfill, the school was constructed between 1967 and 1968. Based on the assumed waste footprint, portions of the athletic fields are underlain by wastes; however, structures do not overlie the waste footprint.

The landfill is identified on the California Department of Resources Recycling and Recovery Solid Waste Information System (SWIS) database as Bell Jr. High SLF/Sweetwater II and is assigned SWIS No. 37-CR-0088. Landfill monitoring and reporting is conducted in accordance with Regional Water Quality Control Board (RWQCB) San Diego Region Order No. 97-11.

4.1. Landfill Gas

In 1989, the County of San Diego installed a landfill gas (LFG) control system consisting of extraction wells, a flare station, blower, condensate collection equipment, and related appurtenances, including three LFG monitoring wells. The flare system includes a flame arrestor, an optical flame detector, an automatic shut-off device, an in-line oxygen analyzer, a flow meter, condensate collection features, and a stack thermocouple. In 2001, a LFG condensate system was installed by the County of San Diego. The site does not have a leachate collection and removal system (Earth Tech, 2004). The locations of the LFG monitoring wells and flare station are shown on Figure 2.

The County of San Diego Department of Public Works operates and maintains the LFG control system and perimeter gas monitoring probes. The perimeter probes are monitored on a monthly basis to detect perimeter gas migration beyond property boundaries and towards on-site structures and the monitoring results are reported to the City of San Diego LEA. The most recent LEA inspection record on file on the SWIS database, dated July 6, 2011, indicates that there was “no evidence of methane gas exceedences.”

4.2. Groundwater

Thirteen groundwater monitoring wells are installed around the perimeter of the assumed waste footprint (Figure 2). The wells are monitored on a biannual basis by the SDUSD and the results are report to the RWQCB.

Based on review by Ninyo & Moore of the cross-sections provided in the Earth Tech Solid Waste Assessment Test report, there appears to be a deep, regional aquifer and a shallower water-bearing unit. However, it does not appear that there is a distinct perched groundwater zone. In September 2011, groundwater elevations in the shallow aquifer ranged from approximately 316.43 to 324.86 feet mean sea level (MSL). Groundwater elevations in the deeper regional aquifer ranged from approximately 294.29 to 321.58 feet MSL. However, the historical depth to groundwater generally ranges from 155 to 180 feet below ground surface (bgs) measured at the top of the slope and between 16 and 51 feet bgs at the bottom of the slope (Ninyo & Moore, 2011a).

During the September 2011 monitoring event, volatile organic compounds (VOCs) were detected in the samples collected from MW-3, MW-3D, and MW-6S, MW-7S, MW-7D, and MW-8S. The VOCs detected included, benzene, chlorobenzene, chloroform, cis-1,2-dichloroethylene (DCE), dichlorofluoromethane, trans-1,2-DCE, 1,1-DCE, 1,2-dichloroethane (DCA), 1,1-DCA, 1,2-dichloropropane, trichloroethylene (TCE), tetrachloroethylene (PCE), trichlorofluoromethan, 1,4-dichlorobenzene, and vinyl chloride. However, with the exception of benzene, cis-1,2-DCE, and TCE in MW-3, cis-1,2-DCE in MW-3D, and 1,2-DCA, cis-1,2-DCE, PCE, and TCE in MW-6S, the concentrations did not exceed their respective State or Federal drinking water maximum contaminant levels (MCL). Metals are generally detected in groundwater at the site; however, in the September 2011 sampling event, arsenic, barium, cobalt, nickel, and zinc in MW-3, nickel in MW-2, and selenium in MW-6 were detected at concentrations which exceeded the State/Federal MCL, but the other detected metals were below their respective MCLs.

5. SITE MAP

Site location and site and vicinity maps are provided as Figures 1 and 2, respectively, which identify the site, surrounding land uses, and monitoring well locations. Surrounding land uses consists primarily of residential development.

6. EVALUATION OF POTENTIAL PUBLIC EXPOSURE TO HAZARDS

During future construction activities that involve disturbing the subsurface materials, procedures must be implemented to protect surrounding receptors, such as the school facilities and residential communities. Community exposures to hazards from site activities and/or releases that may migrate to human and environmental off-site receptors will be minimized. Future project activities that would require implementation of this plan include construction-related activities that disturb the subsurface environment, which includes but is not limited to, grading, slope stabilization activities, subsurface excavation/trenching activities associated with site modernization or site assessment, and other subsurface disturbances at and/or within approximately 1,000 feet from the waste footprint boundary.

Future construction work may be conducted within or in close proximity to the assumed waste footprint and areas of potential human health and environmental impact from the buried waste include the site and off site areas approximately 1,000 feet outward of the assumed waste footprint. There is potential to encountering landfill wastes if construction activities are within the assumed waste footprint. There is potential to encounter LFG during future construction activities within or outlying the assumed waste footprint; however, based on the active LFG extraction system operating at the site, there is a low likelihood of encountering high concentrations of LFG in areas outlying the waste footprint, but high concentrations of landfill gas could be encountered in areas located within the waste footprint. The potential public hazards and nuisances from future subsurface construction activities include:

- organic vapors,
- landfill gases,
- airborne contaminant particles and dust, and
- odors.

Chemical characteristics and anticipated concentrations of the constituents of potential concern are described in the following sections. Although not directly relevant to community exposure, occupational exposure limits, where available, are given for informational purposes and, if measured at the source, would be protective of the community. The perimeter monitoring, action levels, and the required notifications and control measures, if action levels are exceeded, are described in further detail in the following sections.

For the purposes of this CHSP, the monitoring points of compliance will be along the perimeter of the active work area, unless otherwise determined by the CHSM, or designee, based on actual site conditions and activities. The CHSM will be a Certified Industrial Hygienist.

6.1. Volatile Organic Compounds

For the purposes of this plan, organic compounds are considered sufficiently volatile if their Henry's Law Constant is 1 x 10^{-5} atmosphere-meter^3/mole or greater. Toxicities of these compounds range from high (benzene at an occupational exposure limit of 0.5 parts per million [ppm]- American Conference of Governmental Industrial Hygienists - Threshold Limit Values) to non-toxic for methane, which only poses a human health hazard in terms of flammability at very high concentrations or displacement of oxygen in a confined space. LFGs although volatile, are considered separately for the purposes of this plan.

6.2. Landfill Gases

The decomposition of organic materials buried at the site (e.g., municipal solid wastes), results in the generation of LFG that may present a safety and health concern. The presence of LFG presents the most significant risk to the public at the site. Excavation, grading, and trenching activities have the potential to expose workers and the public to LFG if it is present. However, the most recent LEA inspection on file for the site on the SWIS database, dated July 2011, indicates that there was "no evidence of methane gas exceedances."

6.2.1. Methane Gas

Methane gas may be encountered during soil disturbance activities. Methane is odorless and non-toxic, but can present an explosive hazard in high concentrations, can act as a simple asphyxiant (can displace oxygen) in low-lying areas or confined spaces, and may be an indicator of the presence other potentially hazardous LFG. Methane will be monitored as an explosive gas.

6.2.2. Hydrogen Sulfide

Hydrogen sulfide (H_2S) is a colorless, heavier-than-air gas with a characteristic odor. (Note that desensitization can occur, [i.e., the inability to "smell" the odor], resulting in increased danger of overexposure). H_2S is commonly found at landfills as a result of waste decomposition. It can be toxic or fatal if inhaled in high concentrations.

6.2.3. Vinyl Chloride

Vinyl chloride results from the decomposition of chlorinated materials such as plastics and solvents which may have been disposed of as wastes on site. Vinyl chloride is a recognized human carcinogen. The Occupational Safety and Health Administration (OSHA) standard for vinyl chloride (to occupational workers) established an exposure limit of 1 ppm as a time-weighted average and 5 ppm as a short-term exposure limit (i.e., 15 minutes). The action levels established for this site will be designed to adequately protect the public from fugitive emission of this toxic gas. In the unlikely event that site conditions indicate the need to monitor worker exposures to vinyl chloride, perimeter monitoring will also be initiated. The CHSM will determine the type and frequency of monitoring based on site conditions.

6.3. Dust

Future construction activities may include soil excavation, stockpiling, and handling as well as other activities that disturb the subsurface environment. These activities may generate airborne dust that could become a nuisance or a hazard to nearby sensitive receptors (e.g., school facilities and residential communities). In addition, certain contaminants can adhere or adsorb to the soil particles in dust, resulting in potential off-site impacts. Visible dust will be monitored and controlled during construction activities as described in Section 7.

6.4. Odors

If landfill wastes are encountered, odors may be present as a result of degradation of buried organic wastes in the landfill. Odor monitoring by qualitative (olfactory) and semi-quantitative (photoionization detector [PID]) methods and by LFG monitoring will be performed to monitor potential odor issues.

6.5. Metals

Although metal and metal ions do not present volatility or flammability problems, they can present acute and chronic effects if the host material is inhaled in the form of dust or fumes. Metal ions can cause irritation of mucous membranes and lung tissues and some metals such as lead are suspected carcinogens. Since the primary exposure route for metals at the site is through the inhalation of dust, monitoring of the active excavation area for airborne dust will be performed and is expected to control metals exposure to off-site receptors.

7. AIR MONITORING AND EQUIPMENT

In general, air monitoring described in this plan will be performed by the CHSM, or designee, unless otherwise noted, during activities that could potentially generate off-site impacts with results recorded at least every 30 minutes. These activities may include slope stabilization, excavation, grading, loading, transportation, and uncovered stockpiles of wastes, waste containing fills, and other contaminated materials. Perimeter monitoring will be performed for VOCs and dust, while work zone monitoring will be performed for LFGs at the active soil face, or if not possible, in close

proximity during soil disturbance activities (e.g., slope stabilization, excavation, grading, etc.) are taking place. The equipment will consist of direct-reading instruments such as PIDs, aerosol dust monitors (i.e., DataRAM or equivalent), CGIs, and hydrogen sulfide detectors. Calibration of the instruments will be performed in accordance with the manufacturer's specifications.

The contractor or agency performing the work will be responsible for all air monitoring activities related to worker health and safety in accordance with their HASP. The monitoring action levels for the site are provided in Table 1.

Table 1 – Direct Reading or Quantitative Sampling and Analysis

Constituent	Work Area Perimeter Action Level
Airborne dust (metals)	Visible dust or 1 mg/m^3
Total VOCs	5 ppm over background, sustained over 1 minute
Vinyl Chloride	See note*
Methane	10% of LEL at work activity
H_2S	5 ppm

Notes:
LEL = lower explosive limit
mg/m^3 = milligram per cubic meter
$\mu g/m^3$ = microgram per cubic meter
*vinyl chloride will only be monitored at the direction of the CHSM, based on results of methane and H_2S monitoring.

Field personnel trained in proper calibration, use, and maintenance will calibrate direct air monitoring equipment in accordance with the manufacturer's specifications. Table 2 presents the equipment that will be used to comply with above-stated standards.

Table 2 – Air Monitoring Equipment

Equipment	Measures
PID	VOCs
CGI with an H_2S sensor	Explosivity (methane) and H_2S
Aerosol dust monitor (DataRAM or equivalent)	Airborne dust

7.1. Action Plan to Reduce Airborne Concentrations

If a Table 1 action level is exceeded, the project activity(ies) generating the exceedance will be halted until engineering controls are implemented to reduce airborne concentrations to below the action level. Engineering controls and best management practices discussed in Section 8 of this document will be used to help prevent exposure to the public.

If engineering controls fail to reduce airborne concentrations to below the action level, the activity causing the exceedance will stop, the area will be secured, and the SDUSD will be contacted by the CHSM, or designee, to discuss options for additional controls that may be needed to protect the community.

7.2. Documentation

Instrument readings will be recorded in a daily log. The log will include:

- Diagram indicating the work area, the areas of subsurface disturbance, and the monitoring locations.
- Direct reading instruments listed above, including equipment make and model, serial number, and calibration record.
- Table of direct reading results including collection time, date, and location.
- Weather observations including time, wind direction, wind speed, temperature, and precipitation.
- Other conditions or circumstances that may influence monitoring readings.

7.3. Summary of Monitoring Activities

The following items summarize the monitoring duties of the CHSM, or designee. Note that monitoring will be conducted at approximately 30-minute intervals, unless modified by the CHSM, and documented according to Section 7.2:

- Visual and quantitative dust monitoring and engineering controls utilized to minimize dusty conditions.

- VOC perimeter monitoring will be conducted with a PID whenever intrusive activities are occurring. In addition, a CGI with H_2S sensor will be used to detect explosive levels of methane and hydrogen sulfide at the work zone. Work zone levels exceeding perimeter action levels (as indicated in Table 1), may indicate the need for measurement at the perimeter of the site.
- Vinyl chloride will be measured at the active work area only at the request of the CHSM.

8. CONTROL METHODS

Administrative and engineering controls will be implemented to prevent or minimize public exposure to hazards created by construction activities. Control methods to reduce public access, prevent or minimize fugitive vapors, odors, and dust, and reduce noise and other physical hazards will be used. If other contamination hazards are observed during the course of work, the CHSM or designee will be notified and appropriate assessments performed.

8.1. Site Security

Control zones will be established prior to commencement of construction activities at the site, using fencing or barricades. Only authorized personnel, with the proper training and personal protective equipment, will be allowed to enter work area boundaries after they agree to abide by the provisions of this document and the HASP, and are informed of potential dangers that could be encountered while on-site.

8.2. Dust Control

Excavation into dry materials and/or driving vehicles on unpaved portions at the site will likely generate airborne dust. Under certain atmospheric conditions, this dust may become a nuisance or a hazard to nearby sensitive receptors (school facilities and residential communities). The CHSM or designee will visually and quantitatively monitor airborne dust during soil disturbance activities and implement dust control (e.g., watering or procedural change) where appropriate. Dust can generally be mitigated with water, applied by water trucks, as needed, on the surface of active work areas. If water is utilized for dust mitigation, best management practices to control runoff from the site must be used so that contaminants will not leave the site during storms or excessive water application.

If soil stockpiles are generated, they may also be a source of fugitive dust. Some general methods for the temporary storage of wastes include the use of metal, watertight roll-off bins and the construction of stockpiling areas using multiple liners on concrete or asphalt surfaces and secured to berms constructed of concrete K-rails or sand bags. These controls will help to reduce airborne dust and odors. If trucking of waste materials is necessary, trucks carrying wastes shall be enclosed such that dust and odors are not generated during transportation along the haul route. Open trucks shall not be permitted to transport waste from the site that may produce dust or odor during transportation.

8.3. Vapor Control

Disturbing soil impacted by site contaminants may generate odors, which are unhealthy or otherwise unpleasant. During activities where odors could potentially be generated, (e.g., grading, excavating, maintaining stockpiles, loading, and transportation of waste) odor suppression techniques should be employed to mitigate impacts to nearby sensitive receptors. If excessive odors are prevalent, the appropriate means and methods shall be implemented to reduce odors, including application of odor suppression techniques and covering stockpiles and open excavations or trenches. In addition, if excessive odors are present in stockpiles, the stockpiles must be covered prior to leaving the site at the end of each workday.

If intrusive work is being performed close to the perimeter of the work area, care will be taken to ensure that perimeter locations downwind of the activity do not exceed vapor action levels. When vapor action levels are exceeded at the monitoring point of compliance, the activity that is causing the action level to be exceeded will be stopped until measures are implemented to control the ambient vapor. It should be noted that airborne levels of contaminants that would cause an action level to be exceeded, may facilitate work in respiratory protection, as determined by the HASP.

In the event that action levels are exceeded, monitoring may be performed continuously by the CHSM, or designee, until the engineering and/or administrative controls reduce these ambient readings to below the action level. Vapor control methods and instrument readings will be recorded and retained on file.

8.4. Open Excavations

Open excavations present a risk to the community. Therefore, as appropriate, excavations will be backfilled at the end of each workday, or, if not feasible, they will be securely fenced off to prevent unauthorized access. Where vapor emissions or odors are a concern, the excavation surfaces may be lined with plastic prior to leaving the site.

8.5. Stockpiled Materials

Some general methods for the temporary storage of wastes include the use of metal, watertight roll-off bins and the construction of stockpiling areas using multiple liners on concrete or asphalt surfaces and secured to berms constructed of concrete K-rails or sand bags. These controls will help to reduce airborne dust and odors. Stockpiles shall be constructed and managed by as described in the SMP (Ninyo & Moore, 2011b) and in accordance with the project specifications.

8.6. Vehicle Traffic

Vehicles entering and/or exiting the site for loading of wastes and contaminated material slated for off-site disposal or export shall be tracked through documentation and decontaminated, prior to their departure from the site. Care shall be exercised to avoid spillage of contaminated materials from vehicles leaving the site. Trucks carrying wastes shall be enclosed such that dust and odors are not generated during transportation along the haul route identified in the project specifications. Open trucks shall not be permitted to transport wastes from the site that may produce dust or odor during transportation.

8.7. Best Management Practices

To minimize or prevent the discharge of potentially hazardous soils from the subject site, best management practices will be implemented, and local, state, and federal regulations regarding the handling, storage, transportation, and disposal of potentially hazardous wastes and/or soils will be adhered to. When potentially hazardous wastes and/or soils are encountered, best management practices, as described in the SMP (Ninyo & Moore, 2011b), will be followed by personnel trained in accordance with Title 29 Code of Federal Regulations 1910.120 and Title 8 California Code of Regulations 5192.

9. EMERGENCY PLANNING

In the event of an emergency or unauthorized release of a hazardous or potentially hazardous substance or waste, the following actions will be taken:

In the event of a release, which causes a sudden hazard to life or the environment, the contractor or agency performing the work shall immediately secure the area, notify the SHSM or CHSM and the SDUSD representative of the health and/or environmental risk, and call "911" to summon emergency services, as necessary. The SHSM has the knowledge and authority to cease any activity contributing to the hazard. The SHSM will be responsible for notifying the appropriate emergency response agencies and the SDUSD. The SHSM will be identified prior to commencement of construction activities, and the applicable contact names and numbers to report any hazards will be posted at the project site.

Other actions required of the SHSM include:

- Notify other site personnel;
- Stop work activities, as necessary;
- Lower background noise to facilitate communication;
- Begin emergency procedures as described in HASP; and,
- Immediately contain the source and spread of the release per OSHA hazardous waste operations and emergency response training.

If an injury or illness occurs:

- Get first aid for the injured person(s) immediately;
- Obtain professional medical attention if injury is serious; and,
- Notify the appropriate SDUSD contacts within 24 hours of the incident.
- No one should attempt emergency rescue until qualified backup personnel and evacuation routes have been identified.

The following are local emergency telephone numbers:

EMERGENCY	***911***	
FIRE	City of San Diego Fire	(619) 533-4300 (non-emergency)
HOSPITAL	Paradise Valley Hospital 2400 East 4th Street National City, California	(619) 470-4141(non-emergency)
POLICE	San Diego Police Department:	
	Southeastern Division	(619) 527-3592 (non-emergency)
	Paradise Valley Satellite	(619) 527-3541 (non-emergency)

10. PUBLIC NOTICE (PROPOSITION 65 WARNING)

This Public Notice and Proposition 65 Warning are intended to advise the neighboring community of planned site construction activities. The contractor or agency performing the work will be responsible for compliance with the CHSP established for the work and for implementing and complying with the HASP (to be prepared by the contractor or agency performing the work). Prior to the initiation of project activities, the proposed scope of work will be approved by the LEA. The contact name and telephone number for the SDUSD representative listed below and is the person to be contacted regarding any hazards to human health and/or the environment caused during future construction activities that involve excavating subsurface materials.

Suspected or confirmed contaminants at this site include VOCs, metals, and other hazardous substances. Chemicals potentially found at the site are known to cause cancer. This Proposition 65 Warning is required under Section 25249.6 of the State of California Health and Safety Code.

Contact Names and Telephone Numbers:

SDUSD Representative:	Mr. Loren Chico SDUSD Physical Plant Operations Annex 4860 Ruffner Street San Diego, California 92111 (858) 573-5731
SHSM:	To be determined on a project specific basis
CHSM:	To be determined on a project specific basis

11. LIMITATIONS

This plan has been prepared in general accordance with current regulatory guidelines and the standard-of-care exercised in preparing similar plans in the project area. No warranty, expressed or implied, is made regarding the professional opinions presented in this plan. Variations in site conditions may exist and conditions not observed or described in this plan may be encountered during subsequent activities. Please also note that this plan did not include an evaluation of geotechnical conditions or potential geologic hazards.

Ninyo & Moore's opinions and recommendations regarding environmental conditions, as presented in this plan, are based on limited subsurface assessments. Further assessment of potential adverse environmental impacts from past on-site and/or nearby use of hazardous materials may be accomplished by a more comprehensive assessment.

This document is intended to be used only in its entirety. No portion of the document, by itself, is designed to completely represent any aspect of the project described herein. Ninyo & Moore should be contacted if the reader requires any additional information, or has questions regarding content, interpretations presented, or completeness of this document.

This plan is intended exclusively for use by the client. Any use or reuse of the findings, conclusions, and/or recommendations of this plan by parties other than the client is undertaken at said parties' sole risk.

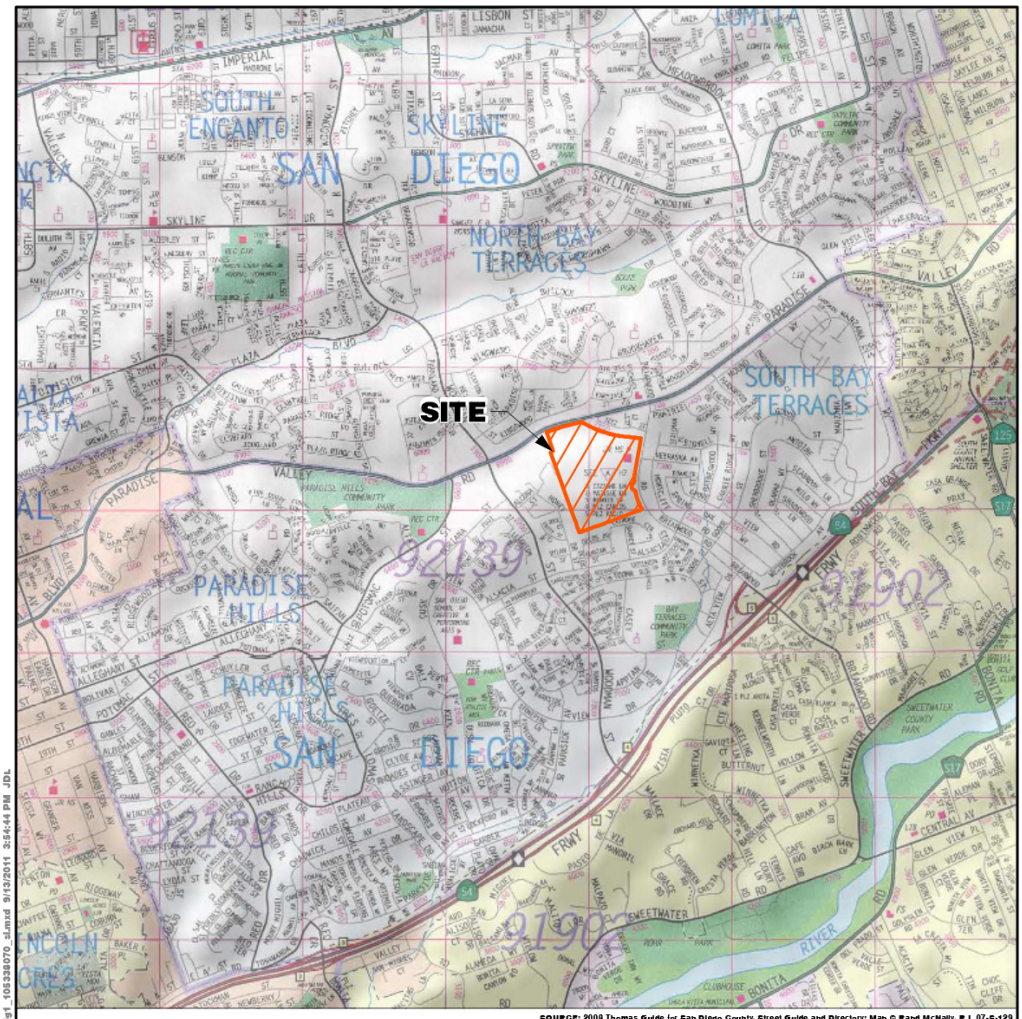
12. REFERENCES

California Water Quality Control Board San Diego Region, 1997, Order 97-11 General Waste Discharge Requirements for Post-Closure Maintenance of Inactive Non-Hazardous Waste Landfills Within the San Diego Region: dated April 9.

Earth Tech, 2004, Final Groundwater Solid Waste Assessment Test (SWAT) Report, Bell Junior High School in San Diego, California: dated April 24.

Ninyo & Moore, 2011a, Semi-Annual Groundwater Monitoring Report, Bell Junior High School Landfill, 620 Briarwood Road, San Diego, California, Regional Board Case No. 9000000916 and Board Order No. 97-11, GeoTracker Global ID No. L10007828563: dated October 26.

Ninyo & Moore, 2011b, Master Soil Management Plan, Bell Junior High School Landfill, 620 Briarwood Road, San Diego, California, Regional Board Case No. 9000000916 and Board Order No. 97-11, GeoTracker Global ID No. L10007828563: dated November 16.



SOURCE: 2008 Thomas Guide for San Diego County, Street Guide and Directory; Map © Rand McNally, R.L.07-S-129

NOTE: DIRECTIONS, DIMENSIONS AND LOCATIONS ARE APPROXIMATE

SCALE IN FEET

0 1,200 2,400 4,800

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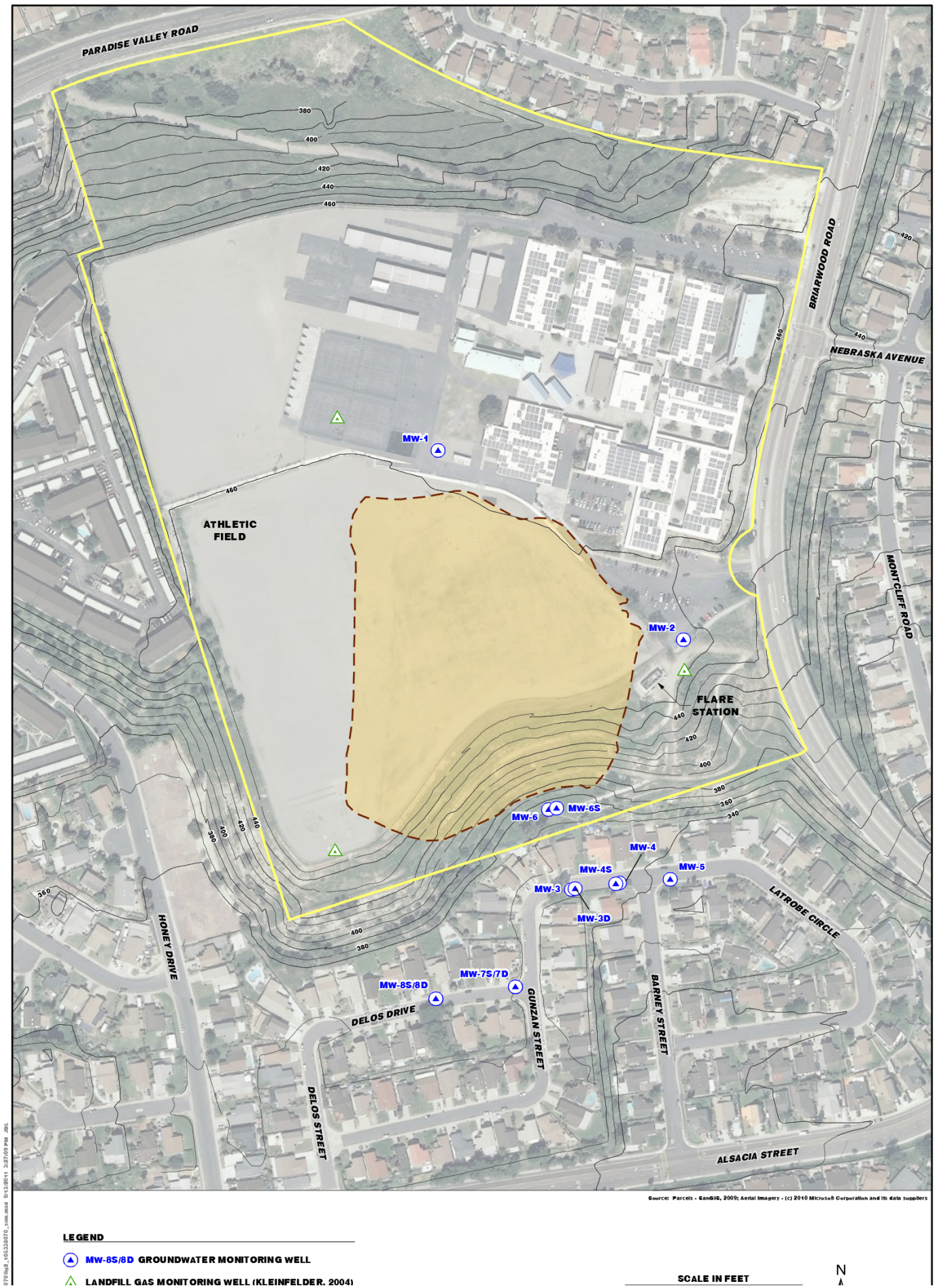
Ninyo & Moore	SITE LOCATION	FIGURE
PROJECT NO. 105338070 / DATE 11/11	BELL JUNIOR HIGH SCHOOL 620 BRIARWOOD ROAD SAN DIEGO, CALIFORNIA	1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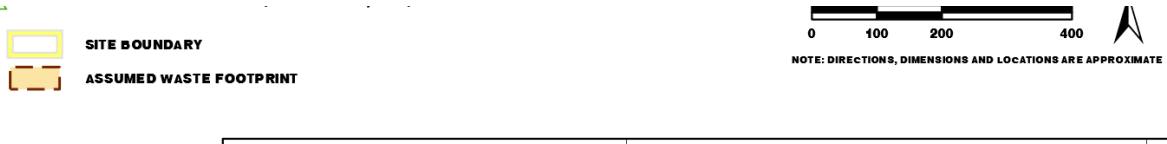
BRIARWOOD ROAD
NEBRASKA AVENUE
MONTCLIFF ROAD
ATHLETIC FIELD
FLARE STATION
MW-1
MW-2
MW-3
MW-3D
MW-4
MW-4S
MW-5
MW-6
MW-6S
MW-7S/7D
MW-8S/8D
HONEY DRIVE
DELOS DRIVE
DELOS STREET
GUNZAN STREET
BARNEY STREET
LATROBE CIRCLE
ALSACIA STREET
380
400
420
440
460
360
340
Source: Parcels - GanGIS, 2009; Aerial Imagery - (c) 2010 Microsoft Corporation and its data suppliers
LEGEND
MW-8S/8D GROUNDWATER MONITORING WELL
LANDFILL GAS MONITORING WELL (KLEINFELDER, 2004)
SCALE IN FEET
N



Ninyo & Moore		SITE AND VICINITY	FIGURE
PROJECT NO.	DATE	BELL JUNIOR HIGH SCHOOL 620 BRIARWOOD ROAD SAN DIEGO, CALIFORNIA	2
105338070	11/11		