5.7 Hazards and Hazardous Materials

5.7 HAZARDS AND HAZARDOUS MATERIALS

This section describes the potential for the Project to expose the public to hazards, hazardous materials, or risk of upset that may be related to existing conditions or new hazards created as a result of the Project. Where significant impacts are identified, mitigation measures are provided to reduce these impacts to the extent feasible. This section is primarily based on the *Phase I Environmental Site Assessment California Grand Village* (Phase I ESA), prepared by EEI Engineering Solutions, dated June 20, 2017; refer to Appendix 11.7, *Phase I Environmental Site Assessment*.

For the purpose of this analysis, the term "hazardous material" refers to both hazardous substances and hazardous waste. A material is defined as "hazardous" if it appears on a list of hazardous materials prepared by a Federal, tribal, State, or local regulatory agency, or if it possesses characteristics defined as "hazardous" by such an agency. A "hazardous waste" is a solid waste that exhibits toxic or hazardous characteristics (i.e., ignitability, corrosivity, reactivity, and/or toxicity).

5.7.1 EXISTING SETTING

The 19.36-acre Site encompasses golf holes 3, 4, 5, and 6 of the Azusa Greens Country Club. Overall, the Site is relatively flat with gentle slopes and elevation ranging between 634 and 645 feet above mean sea level. The Site is presently developed as a golf course with mostly vegetative cover, grass fairways, several sand traps, and ornamental trees lining both sides of each fairway. No water features are present on this portion of the golf course. A single concrete block restroom structure is located between the north/south holes (holes 3 and 6) and the east/west holes (holes 4 and 5). Concrete paved golf cart paths are provided along the fairways adjacent to North Todd Avenue and 10th Street. The surrounding area is comprised of light industrial (including the Rain Bird Corporation) and residential development.

Based on the Phase I ESA, the Site and surrounding area was historically undeveloped land until 1966, at which time the Site was developed as part of the Azusa Public Golf Course. Since 1966, the Site has remained unchanged and similar to current conditions.

Development in the surrounding area began as early as the 1920's with a gravel pit in the Site vicinity to the southwest. Commercial/industrial development appeared to begin in the late 1940's and increased overtime. By 1949, directly west of the Site (across the present-day North Todd Avenue) an area was developed with a plant nursery. In 1988, the Azusa Greens County Club started operating. The primary residential development in the immediate site vicinity began in the 1960's and was associated with the development of the Azusa Greens Golf Course.

ON-SITE STRUCTURES

The single concrete block restroom structure appears to have been constructed sometime between 1966 and 1988. Thus, this on-site structure may be associated with hazardous materials (e.g., ACM and/or LBP).

Structural Asbestos

Asbestos is a strong, incombustible, and corrosion resistant material, which was used in many commercial products since prior to the 1940s and up until the early 1970s. If inhaled, asbestos fibers can result in serious health problems. The California Division of Occupational Safety and Health (Cal/OSHA) asbestos construction standard (Title 8, California Code of Regulations (CCR), Section 1259) defines ACM as material containing more than one percent asbestos. Asbestos Containing Construction Material (ACCM) is defined as any manufactured construction material, which contains more than one tenth of one percent asbestos by weight.

Due to the age of the restroom structure, there is a potential that ACMs are present. Suspect materials that may contain ACMs include, but may not be limited to, drywall systems, floor tiles, ceiling tiles, and roofing systems.

Lead-based Paints

Lead has long been used as a component of paint, primarily as a pigment and for its ability to inhibit and resist corrosion. Over time, as concern over the health effects associated with lead began to grow, health and environmental regulations were enacted to restrict the use of lead in certain products and activities in the U.S. In the last twenty-five years, lead-based paint, leaded gasoline, leaded can solder and lead-containing plumbing materials were among the products that were gradually restricted or phased out of use. Due to the age of the restroom structure, there is a potential that LBP is present.

POTENTIAL GROUNDWATER CONTAMINATION FROM OFF-SITE PROPERTIES

Historical Industrial Operations

Based on the Phase I ESA, historical industrial operations occurred in the vicinity of the Site. Criterion Catalysts and Technologies (Criterion) formerly adjoined the Site to the west. Criterion was a former chemical manufacturing facility, which encompassed approximately 21 acres. Criterion formerly consisted of a catalyst manufacturing facility, outdoor tank storage, office buildings, warehouses, rail spurs, parking lots, and also included a horticultural plant nursery identified as Colorama Wholesale Nursery (1025 North Todd Avenue). Historically, the OWL Fumigating Company operated at the property from 1919 to 1934 for the production of hydrogen cyanide (HCN) gas. Fumigant production continued until approximately 1945. In 1943, parts of the facility were also leased to the U.S. Army Chemical Corps for the production of tear gas bombs in the OWL Plant (later utilized by Colorama Nursery). Sometime in the 1970's the facility manufactured water treatment chemicals containing volatile chromic acid. Automotive catalysts used by General Motors in catalytic converters were also manufactured. Production of hydrotreating catalysts began in July 1981.

Numerous investigations were conducted at the facility between 1991 and 1995. Groundwater investigations included quarterly and semi-annual sampling of four groundwater monitoring wells, and monthly depth to groundwater measurements. Based on results from 23 months of water level data and seven sampling events, the owner at that time requested cessation of groundwater monitoring on July 15, 1996. Groundwater samples were analyzed for purgeable volatile organics, semi-volatile organics, total petroleum hydrocarbons, metals, cyanide and turbidity. Purportedly concentrations of

these compounds were found to be below drinking water standards. In 1998, the RWQCB requested that two quarterly groundwater sampling events be conducted to determine whether perchlorate, 1, 4 dioxane, NDMA, and methyl tertiary butyl ether (MTBE) were present beneath the facility and the former OWL 4x (i.e., Colorama Nursery) property. Perchlorate, 1-4-dioxene, NDMA and MTBE were not detected above the reporting limits in any wells during the two quarterly sampling events.

Soil investigations occurred at the Train Off-Loading Area and the Resin Plant Area in 1991, and the OWL 4x Area Underground Storage Tank (UST) in 1992. Additional Phase II Environmental Site Assessments took place in May and November 2010. The major contaminants of concern (COC) were lead, hexchrome, and total petroleum hydrocarbons (TPH). Approximately 2,680 tons of waste soils were removed and disposed of off the facility. Following remediation, soil contaminated with lead, hexavalent chromium, and residual naphthalene above residential cleanup levels remained in certain areas of the property. The cleanup level was 310 parts per million (ppm) for lead, 5.6 ppm for hexchrome, and 1,000 ppm for TPH. Most of the TPH contamination was at the UST areas and was removed under jurisdiction of the Los Angeles County Department of Public Works. A deed restriction was recorded on the property with the County Registrar-Recorder. No significant soil gas was detected on the facility. Groundwater monitoring wells installed in the 1990's under authority of the U.S. Environmental Protection Agency (EPA) were closed with the approval of the EPA.

Additionally, a 2,200-gallon capacity concrete UST formerly used for emergency spill containment of nickel, chromium, and molybdenum salts in 2011 was demolished and removed. All detected VOC concentrations (2-butanone and styrene) were below applicable Regional Screening Levels (RSLs). Concentrations of all detected metals except arsenic[1] were below the California EPA (CalEPA) Human Health Screening Levels (CHHSLs) and EPA RSLs. Finally, confirmation soil sample analytical results indicated that concentrations of the metals and VOCs detected were below CalEPA CHHSLs and RSLs. Even considering elevated levels of arsenic at this off-site property, the Criterion site is located more than 1,000 feet to the west and is both downhill and downstream from the subject property. Furthermore, the site has received full regulatory closure upon completion of remedial action. Therefore, the potential impact of any residual contamination at the Criterion site to the project site is considered to be insignificant.

In August 2010, Criterion permanently ceased all operating activities, terminating discharge of process water, and the facility was later demolished. Groundwater monitoring wells were properly closed with the approval of the EPA, and a deed restriction was recorded with the Los Angeles County Registrar/Recorder Office to document the remaining contamination of the facility. The County of Los Angeles Fire Department, Prevention Bureau, Health Hazardous Materials Division, Special Operations Section, Site Mitigation Unit (SMU) issued a No Further Action Determination to the facility on June 16, 2012.

Based on the regulatory closure, relative distance, depth to groundwater in the site vicinity (i.e., greater than 50 feet bgs), and position cross-gradient in respect to groundwater flow direction (i.e., to the south/southwest); the Phase I ESA determined Criterion was not an environmental concern to the Site.

[1] Based on the *Determination of a Southern California Regional Background Arsenic Concentration in Soil*, prepared by the Department of Toxic Substances Control, arsenic is comprised of naturally occurring metals, regional anthropogenic contributions, or a site-specific release. Arsenic is especially problematic since the risk-based oil concentration is 100-times below typical ambient concentrations. Thus, it is not unusual to find detections of arsenic above the CalEPA CHHSLs and EPA RSLs.

San Gabriel Valley Regional Groundwater Superfund Site

The San Gabriel Valley Area 2, also known as Baldwin Park Operable Unit (OU), is a groundwater plume that parallels the San Gabriel River in the San Gabriel ground water basin in the Baldwin Park area of Los Angeles County. San Gabriel Valley has been under environmental investigation since 1979 when groundwater contaminated with volatile organic compounds (VOCs) was first identified. Subsequent investigations by the U.S. Environmental Protection Agency (EPA) and others revealed impacted groundwater throughout the San Gabriel Valley, covering tens of square miles. The groundwater contamination results from the historic use and improper handling and disposal of chlorinated solvents (such as tetrachloroethene [PCE] and trichloroethene [TCE]) and other chemicals (other VOCs, 1,4-dioxane, perchlorate, N-nitrosodimethylamine [NDMA]). Chlorinated solvents are used in degreasing, metal cleaning, and other purposes. Perchlorate is used in the manufacturing of solid rocket fuels. NDMA is associated with the production of liquid rocket fuel and is a by-product of wastewater treatment. The chemical 1,4-dioxane has been used as a stabilizer in chlorinated solvents. The EPA believes that the contamination initially stemmed from an increase in industrial activity during World War II, followed by rapid industrial growth during the post-war period. It is assumed that the chemicals were released to the ground by a combination of disposal, careless handling, leaking tanks, and other release mechanisms.

In May 1984, the EPA listed four broad areas of regional-scale groundwater contamination within the Basin (San Gabriel Valley Superfund Site Areas 1 through 4) on the National Priorities List (NPL) under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). In the 1990s, the EPA subsequently divided the San Gabriel Valley Superfund Site into eight operable units (OUs). Since listing the San Gabriel Valley Superfund Sites, the EPA has been working to address the groundwater contamination on a regional scale through installation and operation of groundwater extraction systems that control the contaminant migration. Extracted groundwater is treated to safe levels and, if feasible, is reused for drinking water supply. Local water purveyors operate most of the treatment systems. State and local agencies working with the EPA on these regional scale cleanup efforts include the Los Angeles Regional Water Quality Control Board (RWQCB), Department of Toxic Substances (DTSC), the San Gabriel Basin Water Quality Authority, and San Gabriel Basin Watermaster.

According to the Phase I ESA, the location of the plume was measured at approximately 0.60 miles west of the Site and is situated hydrologically down- to cross-gradient from the Site (i.e., located south/southwest). Based on the regulatory oversight, relative distance, depth to groundwater in the site vicinity (i.e., greater than 50 feet below ground surface [bgs]), and position hydrologically down- to cross-gradient, the Phase I ESA determined the San Gabriel Valley groundwater plume was not an environmental concern to the Site.

CORTESE DATABASE

Government Code Section 65962.5 requires the DTSC and the State Water Resources Control Board (SWRCB) to compile and update the regulatory sites listing (per the Code Section's criteria). Additionally, the State Department of Health Services is also required to compile and update, as appropriate, a list of all public drinking water wells that contain detectable levels of organic contaminants and are subject to water analysis pursuant to Health and Safety Code Section 116395. Government Code Section 65962.5 requires the local enforcement agency, as designated pursuant to CCR Tile 14 Section 18051 to compile, as appropriate, a list of all solid waste disposal facilities from

which there is a known migration of hazardous waste. Based on CalEPA's *Cortese List Data Resources*, the Site is not reported on a list maintained pursuant to Government Code Section 65962.5.[2]

EMERGENCY RESPONSE

The City is responsible for the creation and implementation of a disaster response plan that is to provide for evacuation in an event of an emergency. According to the Azusa Disaster Route Map[3], there are several designated routes to exit out of the City in the event of an emergency evacuation. The nearest designated emergency evacuation route is Foothill Boulevard, to the south of the Site. The nearest freeway access is at the Irwindale Avenue onramp along the Foothill Freeway (I-210), located approximately one mile to the southwest.

5.7.2 REGULATORY SETTING

FEDERAL AND STATE LEVELS

According to the EPA, a "hazardous" waste is defined as one "which because of its quantity, concentrations, or physiochemical or infectious properties, may either increase mortality or produce irreversible or incapacitating illness, or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, or disposed of, or otherwise managed" (U.S. Public Health and Welfare Code Section 6903). Special handling and management are required for materials and wastes that exhibit hazardous properties. Treatment, storage, transport, and disposal of these materials are highly regulated at both the Federal and State levels. Compliance with Federal and State hazardous materials laws and regulations minimizes the potential risks to the public and the environment presented by these potential hazards, which include, but are not limited to, the following:

- Resources Conservation and Recovery Act (RCRA) – hazardous waste management;
- Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) – cleanup of contamination;
- Superfund Amendment and Reauthorization Act (SARA) – cleanup of contamination; and
- Hazardous Materials Transportation Act (HMTA) – safe transport of hazardous materials.

These laws provide the "cradle to grave" regulation of hazardous wastes. Businesses, institutions, and other entities that generate hazardous waste are required to identify and track their hazardous waste from the point of generation until it is recycled, reused, or disposed of. The primary responsibility for implementing RCRA is assigned to the EPA, although individual States are encouraged to seek authorization to implement some or all RCRA provisions.

The EPA and the DTSC have developed and continue to update lists of hazardous wastes subject to regulation. In addition to the EPA and DTSC, the RWQCB, Los Angeles Region (Region 4), is the enforcing agency for the protection and restoration of water resources, including remediation of unauthorized releases of hazardous substances in soil and groundwater. Other State agencies involved in hazardous materials management include the Office of Emergency Services, California Department

[2] California Environmental Protection Agency, *Cortese List Data Resources*, http://www.calepa.ca.gov/sitecleanup/corteselist/, accessed August 21, 2018.

[3] Los Angeles County Department of Public Works, *Azusa Disaster Route Map*, dated June 26, 2008.

of Transportation (Caltrans), California Highway Patrol (CHP), California Air Resources Board (CARB), and CalRecycle. California hazardous materials management laws include, but are not limited to, the following:

- Hazardous Materials Management Act – business plan reporting;
- Hazardous Substance Act – cleanup of contamination;
- Hazardous Waste Control Act – Hazardous waste management; and
- Safe Drinking Water and Toxic Enforcement Act of 1986 – releases of and exposure to carcinogenic chemicals.

Department of Toxic Substances Control

The responsibility for implementation of RCRA was given to CalEPA's DTSC in August 1992. The DTSC is also responsible for implementing and enforcing California's own hazardous waste laws, which are known collectively as the Hazardous Waste Control Law. Although similar to RCRA, the California Hazardous Waste Control Law and its associated regulations define hazardous waste more broadly and regulate a larger number of chemicals. Hazardous wastes regulated by California, but not by EPA, are called "non-RCRA hazardous wastes."

State Water Resources Control Board

Brownfields are underutilized properties where reuse is hindered by the actual or suspected presence of pollution or contamination. The goals of the SWRCB's Brownfield Program are to:

- Expedite and facilitate site cleanups and closures for Brownfields sites to support reuse of those sites;
- Preserve open space and greenfields;
- Protect groundwater and surface water resources, safeguard public health, and promote environmental justice; and
- Streamline site assessment, clean up, monitoring, and closure requirements and procedures within the various SWRCB site cleanup programs.

Site cleanup responsibilities for brownfields primarily reside within four main programs at the SWRCB: the Underground Storage Tank Program, the Site Cleanup Program, the Department of Defense Program and the Land Disposal Program. These SWRCB cleanup programs are charged with ensuring sites are remediated to protect the State of California's surface and groundwater and return it to beneficial use.

California Air Resources Board

One of CARB's major goals is to protect the public from exposure to toxic air contaminants. The California Air Toxics Program establishes the process for the identification and control of toxic air contaminants and includes provisions to make the public aware of significant toxic exposures and for reducing risk.

The Toxic Air Contaminant Identification and Control Act (AB 1807, Tanner 1983) created California's program to reduce exposure to air toxics. The Air Toxics "Hot Spots" Information and Assessment Act (AB 2588, Connelly 1987) supplements the AB 1807 program, by requiring a statewide air toxics inventory, notification of people exposed to a significant health risk, and facility plans to reduce these risks.

Under AB 1807, CARB is required to use certain criteria in the prioritization for the identification and control of air toxics. In selecting substances for review, the CARB must consider criteria relating to "the risk of harm to public health, amount or potential amount of emissions, manner of, and exposure to, usage of the substance in California, persistence in the atmosphere, and ambient concentrations in the community." AB 1807 also requires CARB to use available information gathered from the AB 2588 program to include in the prioritization of compounds. This report includes available information on each of the above factors required under the mandates of the AB 1807 program. AB 2588 air toxics "Hot Spots" program requires facilities to report their air toxics emissions, ascertain health risks, and to notify nearby residents of significant risks. In September 1992, the "Hot Spots" Act was amended by Senate Bill 1731, which required facilities that pose a significant health risk to the community to reduce their risk through a risk management plan.

Accidental Release Prevention Law

The State's Accidental Release Prevention Law provides for consistency with Federal laws (i.e., the Emergency Preparedness and Community Right-to-Know Act and the Clean Air Act) regarding accidental chemical releases and allows local oversight of both the State and Federal programs. State and Federal laws are similar in their requirements; however, the California threshold planning quantities for regulated substances are lower than the Federal quantities. Local agencies may set lower reporting thresholds or add additional chemicals to the program. The Accidental Release Prevention Law is implemented by the Certified Unified Program Agencies (CUPAs) and requires that any business, where the maximum quantity of a regulated substance exceeds the specified threshold quantity, register with the responsible CUPA as a manager of regulated substances and prepare a Risk Management Plan. A Risk Management Plan must contain an off-site consequence analysis, a five-year accident history, an accident prevention program, an emergency response program, and a certification of the truth and accuracy of the submitted information. Businesses submit their plans to the CUPA, which makes the plans available to emergency response personnel. The Business Plan must identify the type of business, location, emergency contacts, emergency procedures, mitigation plans, and chemical inventory at each location.

Transportation of Hazardous Materials/Wastes

Transportation of hazardous materials/wastes is regulated by California Code of Regulations (CCR) Title 26. The United States Department of Transportation (DOT) is the primary regulatory authority for the interstate transport of hazardous materials. The DOT establishes regulations for safe handling procedures (i.e., packaging, marking, labeling and routing). The CHP and Caltrans enforce Federal and State regulations and respond to hazardous materials transportation emergencies. Emergency responses are coordinated as necessary between Federal, State and local governmental authorities and private persons through a State Mandated Emergency Management Plan.

Worker and Workplace Hazardous Materials Safety

Occupational safety standards exist to minimize worker safety risks from both physical and chemical hazards in the workplace. The California Division of Occupational Safety and Health (Cal/OSHA) is responsible for developing and enforcing workplace safety standards and assuring worker safety in the handling and use of hazardous materials. Among other requirements, Cal/OSHA requires many businesses to prepare Injury and Illness Prevention Plans and Chemical Hygiene Plans. The Hazard Communication Standard requires that workers be informed of the hazards associated with the materials they handle.

LOCAL LEVEL

Los Angeles Regional Water Quality Control Board

The Los Angeles RWQCB is the enforcing agency for the protection and restoration of water resources, including remediation of unauthorized releases of hazardous substances in soil and groundwater. The UST Section directs environmental cleanup activities at leaking UST sites. Such sites include active and inactive gasoline stations, agricultural sites, brownfield redevelopment sites, airports, bulk petrochemical storage terminals, pipeline facilities, and various chemical and industrial facilities. The Site Cleanup Section oversees activities at non-UST sites where soil or groundwater contamination have occurred. Many of these sites are former industrial facilities and dry cleaners, where chlorinated solvents were spilled, or have leaked into the soil or groundwater.

South Coast Air Quality Management District

The South Coast Air Quality Management District (SCAQMD) works with the California Air Resources Board and is responsible for developing and implementing rules and regulations regarding air toxics on a local level. The SCAQMD establishes permitting requirements, inspects emission sources, and enforces measures through educational programs and/or fines. SCAQMD Rule 1403 governs the demolition of buildings containing asbestos materials. Rule 1403 specifies work practices with the goal of minimizing asbestos emissions during building demolition and renovation activities, including the removal and associated disturbance of ACM. The requirements for demolition and renovation activities include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and cleanup procedures, and storage and disposal requirements for asbestos-containing waste materials. SCAQMD Rule 166 sets the requirements to control the emission of VOCs from excavating, grading, handling, and treating VOC-contaminated soil as a result of leakage from storage or transfer operations, accidental spillage, or other deposition.

Hazardous Materials Control Program

In May 1982, the Los Angeles County Board of Supervisors established the Hazardous Materials Control Program within the Department of Health Services. Originally, the Program focused on the inspection of businesses that generate hazardous waste, but has since expanded to include hazardous materials inspections, criminal investigations, site mitigation oversight, and emergency response operations. On July 1, 1991, the Program was transferred to the Los Angeles County Fire Department (LACFD) and its name changed to the Health Hazardous Materials Division (HHMD).

The HHMD's mission is to protect the public health and the environment throughout Los Angeles County from accidental releases and improper handling, storage, transportation, and disposal of hazardous materials and wastes through coordinated efforts of inspections, emergency response, enforcement, and site mitigation oversight. The Hazardous Materials Specialists are environmental health professionals dedicated to preventing pollution by serving both the public and business communities in Los Angeles County.

Household Hazardous and E-Waste Program

The Los Angeles County Sanitation District, in cooperation with the Los Angeles County Department of Health Services, has established the Household Hazardous and E-Waste (electronic waste) Roundup Program. The Household Hazardous Waste Collection Program provides Los Angeles County residents a legal and cost-free way to dispose of unwanted household chemicals that cannot be disposed of in the regular trash.

Azusa General Plan

GOALS AND POLICIES

Chapter 4, *Economy and Community*, of the General Plan, discusses fire protection and emergency medical services. This plan provides fire and emergency medical goals and policies as follows:

Goal 2 – Ensure adequate protection from fire and medical emergencies for Azusa residents and property owners.

> Policy 2.7: Ensure that buildings and lots are maintained in a manner that is consistent with fire prevention and personal safety. (PS5 and PS6)
>
> Policy 2.8: Continue to work with the LACFD to provide fire prevention, first aid, and lifesaving public education programs. (PS4)

Chapter 5, *Natural Environment*, of the General Plan, focuses on air, water, flora and fauna, minerals, geology, and noise. This plan provides geology and hazards goals and policies as follows:

Goal 1 – Ensure the continued functioning of essential (critical, sensitive and high-occupancy) facilities following a disaster; help prevent loss of life from the failure of critical and sensitive facilities in an earthquake; and help prevent major problems for post-disaster response, such as difficult or hazardous evacuations or rescues, numerous injuries, and major cleanup or decontamination of hazardous materials.

Chapter 3, *The Built Environment*, of the General Plan, focuses on city design, mobility, housing, historic and cultural resources, and infrastructure. This plan provides wastewater treatment and facilities goals and policies, as well as infrastructure implementation programs as follows:

> Policy 3.8: Continue to monitor businesses that may generate hazardous waste to prevent contamination of water.

Infrastructure Implementation Program 19:

- Implement the Source Reduction and Recycling programs and the Household Hazardous Waste Management programs.

- Solicit Federal funds to offset the City's fiscal impacts for implementing and enforcing these State mandated programs.

Azusa Municipal Code

The Municipal Code includes regulations pertaining to proper handling, storage, and/or use of hazardous materials. The purpose of Chapter 60, *Stormwater and Urban Runoff Pollution Prevention*, is to protect the health and safety of the residents of the City and County by protecting the beneficial uses, marine and river habitats, and ecosystems of receiving waters within the City from pollutants carried by stormwater and non-stormwater discharges.

The following regulations are included in the Municipal Code:

Section 60-8(b) – No person shall cause the disposal of hazardous materials or wastes into trash containers used for municipal trash disposal.

Section 60-10(4) – Discharge to the storm drain system from storage areas for materials containing grease, oil, or hazardous materials, or uncovered receptacles containing hazardous materials, grease, or oil.

Section 60-15(3) – Objects, such as motor vehicle parts, containing grease, oil, or other hazardous materials, and unsealed receptacles containing hazardous materials, shall not be stored in areas exposed to stormwater or otherwise susceptible to runoff.

5.7.3 IMPACT THRESHOLDS AND SIGNIFICANCE CRITERIA

The issues presented in the Initial Study Environmental Checklist (Appendix G of the *CEQA Guidelines*) have been utilized as thresholds of significance in this Section. Accordingly, hazards and hazardous materials impacts resulting from the implementation of a project may be considered significant if they would result in the following:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials (refer to Impact Statement HAZ-1);

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment (refer to Impact Statement HAZ-1);

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school (refer to Impact Statement HAZ-2);

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment (refer to Section 8.0, *Effects Found Not To Be Significant*);

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area (refer to Section 8.0);

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area (refer to Section 8.0);

g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan (refer to Impact Statement HAZ-3); and

h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands (refer to Section 8.0).

Based on these standards, the effects of the Project have been categorized as either a "less than significant impact" or a "potentially significant impact." Mitigation measures are recommended for potentially significant impacts. If a potentially significant impact cannot be reduced to a less than significant level through the application of mitigation, it is categorized as a significant unavoidable impact.

5.7.4 IMPACTS AND MITIGATION MEASURES

ACCIDENTAL RELEASE AND/OR ROUTINE HANDLING OF HAZARDOUS MATERIALS

HAZ-1 Would the proposed Project create a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials, or accident conditions involving the release of hazardous materials?

Impact Analysis:

SHORT-TERM CONSTRUCTION

One of the means through which human exposure to hazardous substance could occur is through accidental release. Incidents that result in an accidental release of hazardous substances into the environment can cause contamination of soil, surface water, and groundwater, in addition to any toxic fumes that might be generated. Human exposure of contaminated soil or water can have potential health effects based on a variety of factors, such as the nature of the contaminant and the degree of exposure. Construction activities associated with the proposed Project could release hazardous materials into the environment through reasonably foreseeable upset and accident conditions. Construction activities could expose construction workers to accidental conditions as a result of existing potential contamination in on-site soils and/or groundwater. The following analysis considers potential disturbance of hazardous materials on-site during construction.

On-Site Structures

It is anticipated that construction activities would include demolition of the single concrete block restroom structure. This on-site structure may be associated with hazardous materials (e.g., ACM and/or LBP), as it appears to be constructed sometime between 1966 and 1988. Demolition of the structure could expose construction personnel and the public to ACMs or LBPs. Federal and State regulations govern the renovation and demolition of structures where ACMs and LBPs are present. All demolition that could result in the release of ACMs or LBPs must be conducted according to Federal and State standards.

The National Emission Standards for Hazardous Air Pollutants mandates that building owners conduct an asbestos survey to determine the presence of ACMs prior to the commencement of any remedial work, including demolition (SCA HAZ-1). If ACM material is found, abatement of asbestos would be required prior to any demolition activities. If paint is separated from building materials (chemically or physically) during demolition of the structures, the paint waste would be required to be evaluated independently from the building material by a qualified Environmental Professional (SCA HAZ-2). If LBP is found, abatement would be required to be completed by a qualified Lead Specialist prior to any demolition activities. Compliance with SCA HAZ-1 and SCA HAZ-2, as well as SCAQMD Rule 1403, would reduce potential impacts in this regard to less than significant levels.

Potential Groundwater Contamination from Off-site Properties

Potential Contamination from San Gabriel Valley (Area 2)

Based on the Phase I ESA, San Gabriel Valley (Area 2) is a groundwater plume that parallels the San Gabriel River. Numerous investigations have been conducted to assess potential contamination from former industrial manufacturing operations. Findings indicated elevated levels of chlorinated solvents, VOCs, 1,4-dioxane, perchlorate, arsenic, and NDMA in groundwater. According to the Phase I ESA, the location of the plume was measured at approximately 1,000 feet west of the Site and is situated hydrologically down- to cross-gradient from the Site (i.e., located south/southwest), and therefore is not anticipated to have resulted in groundwater contamination underlying the Site. Therefore, a less than significant impact would occur in this regard.

Potential Contamination from Criterion

Based on the Phase I ESA, numerous groundwater, soil, and soil gas investigations were conducted at the facility from 1991 to 2011. Groundwater concentrations of purgeable volatile organics, semi-volatile organics, total petroleum hydrocarbons, metals, and cyanide were found to be below drinking water standards. Following remediation, soil contaminated with lead, hexavalent chromium, and residual naphthalene above residential cleanup levels remained in certain areas of the property. No significant soil gas was detected on the facility. The County of Los Angeles Fire Department, Prevention Bureau, Health Hazardous Materials Division, Special Operations Section, SMU issued a No Further Action Determination to the facility on June 16, 2012. Based on the Phase I ESA, this property is not anticipated to have resulted in soil gas or groundwater contamination underlying the Site due to regulatory closure, relative distance, depth to groundwater in the site vicinity (i.e., greater than 50 feet bgs), and position cross-gradient in respect to groundwater flow direction (i.e., to the south/southwest). Thus, impacts in this regard would be less than significant.

PROJECT OPERATIONS

Operation of the proposed Project would involve the routine transport, use, and disposal of hazardous materials such as herbicides and pesticides, disinfectants, pharmaceuticals, blood, and other potentially infectious material. OSHA mandates that assisted living facilities have written safety compliance plans specific to their facility and a location that addresses the safety standards for their industry, such as a Landscaping and Ground Maintenance Safety Plan, Housekeeping and Material Storage Safety Plan, Hazardous Waste Safety Plan, Needlestick and Sharps Safety Plan, and Bloodborne Pathogens Safety Plan. Full compliance with OSHA mandatory compliance safety plans, as well as other applicable Federal, State, and local laws and regulations related to the routine transport, use, and disposal of hazardous materials in the workplace, would ensure that impacts resulting from the routine transport, use, and disposal of hazardous materials associated with the operation of the Project would not result in a significant hazard to human health and/or the environment. Therefore, hazardous material impacts from operation of the Project would be less than significant.

Based on the analysis above, it is unlikely that significant hazards related to existing hazardous materials would be encountered during construction. However, in the event that any unknown waste materials or suspect materials are discovered by the contractor during construction, implementation of SCA HAZ-3 would be required. This measure would minimize impacts in this regard to a less than significant level.

Standard Conditions of Approval:

SCA HAZ-1 Prior to demolition activities, an asbestos survey shall be conducted by an Asbestos Hazard Emergency Response Act (AHERA) and California Division of Occupational Safety and Health (Cal/OSHA) certified building inspector to determine the presence or absence of asbestos containing-materials (ACMs). The sampling method to be used shall be based on the statistical probability that construction materials similar in color and texture contain similar amounts of asbestos. In areas where the material appears to be homogeneous in color and texture over a wide area, bulk samples shall be collected at discrete locations from within these areas. In unique or nonhomogeneous areas, discrete samples of potential ACMs shall be collected. The survey shall identify the likelihood that asbestos is present in concentrations greater than 1 percent in construction materials. If ACMs are located, abatement of asbestos shall be completed prior to any activities that would disturb ACMs or create an airborne asbestos hazard. Asbestos removal shall be performed by a State certified asbestos containment contractor in accordance with the South Coast Air Quality Management District (SCAQMD) Rule 1403. Common asbestos abatement techniques involve removal, encapsulation, or enclosure. The removal of asbestos is preferred when the material is in poor physical condition and there is sufficient space for the removal technique. The encapsulation of asbestos is preferred when the material has sufficient resistance to ripping, has a hard or sealed surface, or is difficult to reach. The enclosure of asbestos is to be applied when the material is in perfect physical condition, or if the material cannot be removed from the site for reasons of protection against fire, heat, or noise.

SCA HAZ-2 If paint is separated from building materials (chemically or physically) during demolition of the structures, the paint waste shall be evaluated independently from the building material by a qualified Environmental Professional. A portable, field X-ray fluorescence (XRF) analyzer shall be used to identify the locations of potential lead paint, and test accessible painted surfaces. The qualified Environmental Professional shall identify the likelihood that lead is present in concentrations greater than 1.0 milligrams per square centimeter (mg/cm_2) in/on readily accessible painted surfaces of the buildings. If lead-based paint is found, abatement shall be completed by a qualified Lead Specialist prior to any activities that would create lead dust or fume hazard. Potential methods to reduce lead dust and waste during removal include wet scraping, wet planning, use of electric heat guns, chemical stripping, and use of local High Efficiency Particulate Air (HEPA) exhaust systems. Lead-based paint removal and disposal shall be performed in accordance with California Code of Regulation Title 8, Section 1532.1, which specifies exposure limits, exposure monitoring and respiratory protection, and mandates good worker practices by workers exposed to lead. Contractors performing lead-based paint removal shall provide evidence of abatement activities to the City Engineer.

SCA HAZ-3 If unknown wastes or suspect materials (such as stained soils, odors, and/or unknown debris) are discovered during construction by the contractor that he/she believes may involve hazardous waste/materials, the contractor shall:

- Immediately stop work in the vicinity of the suspected contaminant, removing workers and the public from the area;
- Notify the City of Azusa Director of Public Works;
- Secure the areas as directed by the City;
- Notify the implementing agency's Hazardous Waste/Materials Coordinator; and
- Perform remedial activities (as required per the implementing agency, and dependent upon the nature of the hazardous materials release) as required under existing regulatory agency standards.

Mitigation Measures: No mitigation measures are required.

Level of Significance: Less Than Significant Impact.

SCHOOL SITES

HAZ-2 Would future development in accordance with the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing school?

Impact Analysis: One existing school is situated within 0.25-mile of the Site (Hodge Elementary School located 0.16-mile northeast of the Site). The Project is anticipated to involve the demolition

of the existing bathroom structure, which may require the handling of hazardous (ACMs and LBPs) materials at the Site as well as the transport of these materials off-site to an approved landfill facility. Further, the Project would require transport, use, and disposal of hazardous materials during the operation of the assisted living facility. Such activities would not generally pose a substantial risk to schools in the vicinity, as the transport, use, and disposal of hazardous materials would be conducted in full compliance with OSHA mandatory compliance safety plans, as well as other applicable Federal, State, and local laws and regulations. With compliance with Federal, State, and local laws and regulations as well as implementation of the recommended SCA HAZ-1, SCA HAZ-2, and SCA HAZ-3, the Project is not anticipated to result in any negative impacts involving the handling of hazardous materials, substances, or waste within the vicinity of nearby schools. Impacts in this regard would be reduced to less than significant levels.

Standard Conditions of Approval: Refer to SCA HAZ-1, SCA HAZ-2, and SCA HAZ-3.

Mitigation Measures: No mitigation measures are required.

Level of Significance: Less Than Significant Impact.

EVACUATION PLAN

HAZ-3 Would Project operations create a significant hazard to the public or environment through interference with an adopted emergency response or evacuation plan?

Impact Analysis: The Project is subject to compliance with the City's disaster response plan that is to provide for evacuation in an event of an emergency. The Project would result in increased truck trips during construction. However, the Project would be subject to the site plan review requirements of the Department of Emergency Services under the Azusa Police Department to ensure that all access roads, driveways, and parking areas would remain accessible to emergency service vehicles. Further, a construction management plan would be developed as part of SCA TRA-1, which would implement a variety of measures that would further minimize traffic and parking impacts upon the local circulation system. Therefore, a less than significant impact related to emergency response and evacuation plans would result.

Standard Conditions of Approval: Refer to SCA TRA-1 presented in Section 5.8, *Traffic and Circulation*.

Mitigation Measures: No mitigation measures are required.

Level of Significance: Less Than Significant Impact.

5.7.5 CUMULATIVE IMPACTS

CEQA Guidelines Section 15355 requires an analysis of cumulative impacts, which are defined as, "two or more individual effects which, when considered together, are considerable, or which compound or increase other environmental impacts." As outlined in Table 4-1, *Cumulative Projects List*, and illustrated on Exhibit 4-1, *Cumulative Projects Map*, cumulative projects are situated in the Site vicinity.

- **Development in accordance with the Project and cumulative development could result in cumulatively considerable impacts related to hazards and hazardous materials.**

- **Project operations could create a significant hazard to the public or environment through interference with an adopted emergency response or evacuation plan.**

Impact Analysis: Cumulative projects are not anticipated to result in a cumulatively considerable hazardous materials impact. As discussed above, implementation of the proposed Project would not result in significant impacts involving hazards and hazardous materials. Other cumulative projects could result in the increase in handling of hazardous materials, potential for accidental conditions, or an increase in the transport of hazardous materials, particularly during site disturbance/demolition/ remedial activities. However, with compliance with the DTSC, OCHCA, CalEPA, Cal/OSHA, and LACFD laws and regulations, these impacts would be minimized. Compliance with all applicable Federal and State laws and regulations related to the handling of hazardous materials and standard conditions of approval would reduce the likelihood and severity of accidents, thereby ensuring that a less than significant cumulative impact would result. As the proposed Project would not result in significant impacts involving hazards and hazardous materials, the Project would not result in a cumulatively considerable impact in this regard.

The proposed Project was determined to have a less than significant impact in regard to interfering with an emergency evacuation plan. Cumulative projects in the area would be analyzed for impairment of emergency access vehicles and consistency with the City's disaster response plan on a project-by-project basis and would be required to comply with all City roadway design standards to ensure adequate emergency access is not impacted. Therefore, the proposed Project would have a less than significant cumulatively considerable impact with regard to interfering with an emergency plan with implementation of recommended standard conditions of approval.

Standard Conditions of Approval: Refer to SCA TRA-1, SCA HAZ-1, SCA HAZ-2, and SCA HAZ-3.

Mitigation Measures: No mitigation measures are required.

Level of Significance: Less Than Significant Impact.

5.7.6 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts related to hazards and hazardous materials have been identified following implementation of the recommended mitigation measures and compliance with the applicable Federal, State, and local regulatory requirements and standard conditions of approval.