



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 following documentation (refer to [Appendix 11.6, *Phase I Environmental Site Assessment*](#)): *Phase I Environmental Site Assessment 1025 North Todd Avenue* (Phase I ESA), prepared by Hazard Management Consulting, dated January 18, 2017.

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 Site is currently developed with a former commercial nursery. Existing on-site development includes an office, greenhouses, potting sheds, shade structures, an agricultural chemical storage building, a tractor repair building, parking areas, and other features typical of a wholesale nursery. The Site is relatively flat and gently slopes between elevations of 633 feet to 640 feet above mean sea level. There are also two lined-ponds at the Site’s northwest portion that are used for nursery irrigation. The ponds were formerly used to collect, treat, and recycle irrigation water from rain and nursery operations. Runoff and wastewater from nursery operations were collected in one pond, treated, then discharged to the second pond where water was stored until used for nursery irrigation. Based on the Phase I ESA, the former nursery used agricultural chemicals and automotive chemicals (fuel, oil), which were noted as being stored on secondary containment without evidence of stains or spills. The Site is surrounded by the following:

- *North*: Light industrial uses (Army National Guard) and commercial/business park uses are located to the north across West Sierra Madre Avenue. Residential uses are located to the northeast. Areas to the north are zoned DWL, while areas to the northeast are zoned Moderate Density Residential.
- *East*: North Todd Avenue and recreation uses (Azusa Greens Golf Course) are located to the east. Areas to the east are zoned Recreation (Rec).
- *South*: Light industrial uses (Lagunitas Brewing Company) are located to the south. Areas to the south are zoned DWL.
- *West*: Light industrial uses (Laborers Training School) are located to the southwest, and open space uses (San Gabriel River) are located to the west. Areas to the southwest and west are zoned DWL and Open Space (OS), respectively.



HISTORICAL ON-SITE USES

Based on the Phase I ESA, the Site was historically open undeveloped land until the late 1930s when the Site and its adjacent properties were developed as a pesticide manufacturing facility known as the American Cyanamide Company (ACC). During World War II, the eastern portion of the Site was leased to the U.S. Army to make and store cyanogen chloride (tear gas) bombs and the western portion of the Site was operated by ACC as a gypsum dewatering/evaporation impoundment area. The tear gas facility was completed in 1944, placed on standby maintenance in 1945, abandoned in 1953, and partially demolished in the late 1950s. In 1987, Colorama Wholesale Nursery leased the eastern portion of the Site and began operations. By 1996, Colorama Wholesale Nursery expanded to include the western portion of the Site. By 2017, the Colorama Wholesale Nursery has ceased operation and is currently removing/recycling materials at the Site.

Former Industrial Manufacturing

HISTORICAL INDUSTRIAL OPERATIONS

As discussed above, the Site has historically operated as a pesticide manufacturing and tear gas bomb production facility. The pesticide manufacturing facility contained a gypsum dewatering/ evaporation impoundment area located on the western portion of the Site. The gypsum was produced as a by-product of a chemical process to produce hydrogen cyanide (HCN) gas at the property immediately south. The former operations involved the production of HCN gas (an orchard fumigant) at the ACC facility. During World War II, the HCN gas was moved via pipeline to the eastern portion of the Site where it was reacted with chlorine to produce cyanogen chloride for use in tear gas bombs. The byproduct generated from this process was a dark colored, gypsum slurry, which was disposed of into evaporation ponds known as the gypsum impoundment area (western portion of the Site). Wastes from the manufacturing process were reportedly neutralized and allowed to settle at a neutralizer or clarifier. The underflow from the clarifier was pumped to the impoundment area to evaporate.

In 1987, the eastern portion of the Site was evaluated for possible chemical contamination resulting from the production of tear gas bombs. Soil, sludge, and groundwater sampling was conducted at the Site. Laboratory analyses were performed to evaluate pH, cyanides, metals, volatile organic compounds (VOCs), and base/neutral and acid extractable organic compounds. One down-gradient groundwater monitoring well was installed at the Site boundary. Findings indicated elevated pH levels in soils and gypsum deposits, as well as cyanide, chromium, iron, and lead, specifically in the areas of the neutralization plant and waste disposal basins. VOCs were also detected in a soil/sludge sample at the base of the neutralization tank. Some pH values from samples from gypsum impoundment exceeded California Hazardous Waste criteria. Based on groundwater monitoring which showed no impact from the gypsum pond, the Regional Water Quality Control Board (RWQCB) agreed that the residual gypsum can remain and the pond was closed.

HISTORICAL UNDERGROUND STORAGE TANKS

The former tear gas bomb production area contained four underground storage tanks (USTs) on-site. The U.S. Army vacated the Site in 1945 and the USTs were left in place. The USTs were used to store solvents and fuel. The solvent was reported to be carbon tetrachloride used for washing bomb shells. Cleaning solvents were reportedly used to clean bomb casings, which included carbon tetrachloride, Solvsol, and possibly trichloroethane (TCE). In the late 1950s, the Department of Defense (DOD)



abandoned the Site and turned it back over to ACC. The USTs were removed from the tear gas bomb production area by 1985 and no evidence of leakage during the tank removal process was reported. The Los Angeles County Department of Public Works (DPW) provided a no further action letter to ACC on December 12, 1985.

San Gabriel Valley Regional Groundwater Superfund Site

The Site and properties immediately to the south have attracted the attention of the U.S. Environmental Protection Agency (EPA) and the RWQCB as a **potential** source of VOCs in the drinking water wells in the Baldwin Park, California Area. Subsequent investigations of the Baldwin Park area and the much larger and contiguous San Gabriel Valley caused the formation of the San Gabriel Valley Regional Groundwater Superfund Site. Beginning in 1989, the RWQCB inspected more than 1,400 commercial and industrial facilities (including the Site) to determine the sources of the groundwater contaminants. The Well Investigation Program (WIP) was established to identify potentially responsible parties contributing to groundwater contamination at the San Gabriel Basin/Baldwin Park Superfund site. Based on the Phase I ESA, the Site and the property immediately to the south both participated in the WIP directed by the RWQCB. Seven groundwater monitoring wells were installed as a result of the WIP and were sampled either quarterly or semi-annually. Groundwater analytical results were historically below maximum contaminant levels for a variety of metals, volatile organic compounds, and other constituents. The Site was determined to not be a source of impact to the regional groundwater condition and was judged to not be a responsible party to the superfund action.

From 1994 to 1999, groundwater monitoring was conducted across the Site in response to directives from the EPA and RWQCB. The 1994 Groundwater analytical results indicated the detection of bromodichloromethane (BDCM) above regulatory thresholds. Based on results from seven sampling events, Cytec (previously known as ACC) requested cessation of groundwater monitoring in a letter to RWQCB dated July 15, 1996. The July 15, 1996 letter further stated that clean closure of all Resource Conservation and Recovery Act (RCRA) identified sites had been previously completed under the direction of the Department of Toxic Substances Control (DTSC). In 1998, the RWQCB requested groundwater sampling events to determine whether perchlorate, 1,4-dioxane, N-nitrosodimethyl-amine (NDMA), and methyl tertiary butyl ether (MTBE) were present beneath the Site. Groundwater analytical results indicated that all constituents were not detected above reporting limits. In 1999, soil samples from beneath a large clarifier slab were analyzed for VOCs, metals, and pH. No significant contamination was found beneath the clarifier slab. It should be noted that the Site has not been formally closed by the RWQCB. It appears that the RWQCB case remains open; however, the RWQCB has agreed that no further groundwater monitoring is necessary and all the wells have been abandoned.

Subsequent to the RWQCB investigation, the Site was entered into the Los Angeles County Fire Department Health Hazardous Materials, Site Mitigation Unit (SMU) program for closure evaluation. The Site was further investigated and remediation was conducted. As part of the closure review, the SMU required the remaining groundwater wells to be abandoned with the concurrence of the EPA. The SMU issued a No Further Action (NFA) letter dated June 16, 2012.



CORTESE DATABASE

Government Code Section 65962.5 requires the Department of Toxic Substances (DTSC) and the State Water Resources Control Board (SWRCB) to compile and update a 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 Title 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. As discussed above, hazardous materials contamination concerns as a result of past historical industrial operations resulted in past investigation at the Site, listing the site pursuant to Government Code Section 65962.5.

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,¹ 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

¹ Los Angeles County Department of Public Works, *Azusa Disaster Route Map*, dated June 26, 2008.



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 Regional Water Quality Control Board (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 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 California Environmental Protection Agency's (Cal EPA'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 State Water Resources Control Board's (SWRCB) 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 and HAZ-2);



- 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 and HAZ-2);
- 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 Section 8.0, *Effects Found Not To Be Significant*);
- 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 Impact Statement HAZ-1 and HAZ-2);
- 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

CONSTRUCTION-RELATED ACCIDENTAL RELEASE OF HAZARDOUS MATERIALS

HAZ-1 Would short-term construction activities create a significant hazard to the public or environment through accident conditions involving the release of hazardous materials?

Impact Analysis:

WAREHOUSE ONLY OPTION

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 development of the Warehouse Only Option 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.

As the Site was historically used for industrial manufacturing, the Site may contain chemical residues in the soil. Due to the nature of the former industrial operations, the Phase I ESA recommends a Soil Management Plan (SMP) during grading activities (HAZ-1). Site grading would require approximately 120,429 cubic yards of cut and approximately 120,429 cubic yards of fill. Additionally, limited off-site grading would be required along the Site's northern and eastern boundaries. The SMP would provide guidelines for safety measures, soil management, and handling of disturbed soils. The SMP would also be required to present a decision framework and specific risk management measures for managing soil in a manner protective of human health and consistent with applicable regulatory requirements. With implementation of the recommended Mitigation Measure HAZ-1, impacts in this regard would be reduced to less than significant levels.

Historical On-site Operations

Potential Contamination from Former Colorama Wholesale Nursery

As the Site historically operated as a nursery, the Site may contain pesticide residues in the soil. Based on the Phase I ESA, agricultural chemicals and automotive chemicals (i.e., fuel and oil) were noted as being stored on-site in secondary containment without evidence of stains or spills. Thus, impacts in this regard would be less than significant.

Potential Contamination from Former Industrial Manufacturing

Based on the Phase I ESA, numerous investigations have been conducted at the Site to assess potential contamination from former industrial manufacturing operations. Findings indicated elevated pH levels in soils and gypsum deposits, as well as cyanide, chromium, iron, and lead, specifically in the areas of the neutralization plant and waste disposal basins. VOCs were also detected in a soil/sludge sample at the base of the neutralization tank. Some pH values from samples from gypsum impoundment exceeded California Hazardous Waste criteria. Based on groundwater monitoring which showed no impact from the gypsum pond, the RWQCB agreed that the residual gypsum can remain and the pond was closed. With implementation of the recommended Mitigation Measure HAZ-1, impacts in this regard would be reduced to less than significant levels.

Regional Contaminated Groundwater

The Site is located upgradient of the San Gabriel Valley groundwater superfund action. As a result of the superfund action investigation, seven groundwater monitoring wells were installed and sampled either quarterly or semi-annually. Groundwater analytical results were historically below maximum contaminant levels for a variety of metals, volatile organic compounds, and other constituents. The Site was determined not to be a source of impact to the regional groundwater condition and was not judged to be a responsible party to the superfund action. Based on the information provided, the depth to groundwater at the Site is estimated to be between 90 to 175 feet below ground surface (bgs).



Therefore, groundwater is not anticipated to be encountered and impacts would be less than significant with implementation of Mitigation Measure HAZ-1.

WAREHOUSING AND MANUFACTURING OPTION

Since the Warehousing and Manufacturing Option would result in the same building footprint and similar construction impacts as the Warehouse Only Option, a less than significant impact would result with implementation of Mitigation Measure HAZ-1.

Standard Conditions of Approval: No standard conditions of approval are applicable.

Mitigation Measures:

HAZ-1 Prior to issuance of a grading permit, a Soil Management Plan (SMP) shall be prepared by a qualified environmental professional with Phase II/Site Characterization experience. The SMP shall be made available to the contractor and the City Engineer for use during grading activities. The SMP shall include verification sampling for soil import/export to confirm no presence of hazardous materials. The SMP shall also include a decision framework and specific risk management measures for managing soil in a manner protective of human health and consistent with applicable regulatory requirements.

Level of Significance: Less Than Significant Impact With Mitigation Incorporated.

LONG-TERM ACCIDENTAL RELEASE OF HAZARDOUS MATERIALS

HAZ-2 Would Project operations create a significant hazard to the public or environment through accidental conditions involving the release of hazardous materials?

Impact Analysis:

WAREHOUSE ONLY OPTION

Although specific tenants and their uses are not known at this time, long-term operation of the Warehouse Only Option may involve the transport, use, and/or storage of hazardous materials. The majority of development on the Site is not anticipated to involve large quantities of hazardous materials. However, operation of the Warehouse Only Option is anticipated to handle, store, and/or transport hazardous materials.

The Warehouse Only Option may include the use, handling, and storage of hazardous materials (i.e., common petroleum products and/or cleaning solvents) in small quantities. No acutely hazardous substances are expected to be utilized during operation of these facilities. In accordance with State requirements, a Hazardous Materials Business Plan for facilities storing substances above minimum reporting requirements must be prepared and kept on file with the LACFD. The Fire Department would inspect these facilities every year for adequate storage, handling, and labeling practices and would note changes in quantities. Contact names, diagrams for storage locations and emergency spill procedures are required as part of the Hazardous Materials Business Plan. Similarly, material safety data sheet (MSDS) be kept at the facility for each chemical used and stored, which outlines the chemical components and safety handling measures to be followed by employees. The Warehouse Only Option would also be required to comply with the Federal rule, EPA Risk Management Planning



(RMP) Rule 40 CFR 68, which would require the operator to register the facility with the EPA prior to on-site storage of hazardous chemicals. Thus, the Warehouse Only Option's impacts would be less than significant upon implementation of applicable Federal, State, and local standards and regulations.

Vapor Intrusion from Contaminated Groundwater

The intrusion of subsurface vapors into buildings is one of many exposure pathways that must be considered in assessing the risk posed by releases of hazardous chemicals into the environment. According to the Phase I ESA, there are no VOC releases in the immediate Site vicinity and no evidence or data that would raise a vapor intrusion concern for the Site. Therefore, impacts would be less than significant in this regard.

WAREHOUSING AND MANUFACTURING OPTION

The Warehousing and Manufacturing Option would result in slightly different operations, compared to the Warehouse Only Option, as warehousing uses would be reduced and additional manufacturing uses would be constructed.

The proposed Warehousing and Manufacturing Option may include the transportation, use, and disposal of hazardous materials at the Site. However, light industrial land uses such as those associated with the Project typically do not generate, store, or dispose of large quantities of hazardous materials. In addition, light industrial land uses generally do not involve dangerous or volatile operational activity that may expose persons to large quantities or hazardous materials.

Nonetheless, all hazardous materials are required to be stored, handled, and transported in compliance with applicable laws and regulations as discussed above, risks related to the routine transport, use and disposal of hazardous materials would be minimized. Therefore, operation of proposed uses is not expected to pose a threat to people residing or working in the area. Warehousing and Manufacturing Option impacts would be less than significant upon implementation of applicable Federal, State, and local standards and regulations.

Standard Conditions of Approval: No standard conditions of approval are applicable.

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:

WAREHOUSE ONLY OPTION

The Warehouse Only Option is subject to compliance with the City's disaster response plan that is to provide for evacuation in an event of an emergency. The Warehouse Only Option would result in increased truck trips during construction. However, the Warehouse Only Option 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.

WAREHOUSING AND MANUFACTURING OPTION

The analysis for the proposed Warehouse Only Option is also applicable to the Warehousing and Manufacturing Option. Construction phasing, duration, and vehicle trips would be similar under both development options. Impacts would be reduced to less than significant levels with local requirements and further reduced via implementation of SCA TRA-1.

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

Section 15355 of the *CEQA Guidelines* 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.

- **Would Project development and cumulative development could result in cumulatively considerable impacts related to hazards and hazardous materials?**

Impact Analysis:

WAREHOUSE ONLY OPTION

Cumulative development would include some industrial and commercial uses, which could involve the use of various hazardous products in greater quantities. Residential development would also increase the use of household-type hazardous materials. The use, storage, disposal, and transport of hazardous materials could result in a foreseeable number of spills and accidents. All construction and demolition activities, as well as all new development, would be subject to compliance with hazardous materials regulations. Future development would be required to evaluate their respective hazards and hazardous materials impacts on a project-by-project basis. Compliance with all Federal, State, and local regulations during the construction and operation of new developments would ensure that there are no cumulatively considerable significant hazards to the public or the environment associated the routine transportation, use, disposal, or release of hazardous materials.



The Warehouse Only Option may include the use, handling, and storage of hazardous materials in small quantities. Therefore, minimal impacts could occur from hazardous materials spills and accidents. However, with compliance with the DTSC, California EPA, 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 would reduce the likelihood and severity of accidents, thereby ensuring that a less than significant cumulative impacts result. As discussed above, with implementation of the recommended Mitigation Measure HAZ-1, implementation of the Warehouse Only Option would not result in significant impacts involving hazards and hazardous materials. As the Warehouse Only Option would not result in significant impacts involving hazards and hazardous materials, this development option would not result in a cumulatively considerable impact in this regard.

Regional Contaminated Groundwater

The Site and properties immediately to the south have attracted the attention of the EPA and the RWQCB as a potential source of VOCs in the drinking water wells in the Baldwin Park, California Area. Subsequent investigations of the Baldwin Park area and the much larger and contiguous San Gabriel Valley caused the formation of the San Gabriel Valley Regional Groundwater Superfund Site.

Based on the Phase I ESA, investigations at the Site have led to the determination that the Site has not contributed to the San Gabriel Valley Regional Groundwater Superfund Site.

Compliance with all Federal, State, and local regulations during the construction and operation of new developments would ensure that there are no cumulatively considerable significant hazards to the public or the environment associated the routine transportation, use, disposal, or release of hazardous materials. Thus, impacts would not be cumulatively considerable with implementation of Mitigation Measure HAZ-1 for the Warehouse Only Option.

WAREHOUSING AND MANUFACTURING OPTION

The Warehousing and Manufacturing Option would result in slightly different operations, compared to the Warehouse Only Option, as warehousing uses would be reduced and additional manufacturing uses would be constructed. The Warehousing and Manufacturing Option could involve the transportation, use, and disposal of hazardous materials at the Site. Thus, the Warehousing and Manufacturing Option could contribute, cumulatively (although not significantly), to a hazard involving the transport of hazardous materials. Compliance with Title 49 of the Code of Federal Regulations, pertaining to the strict regulations for the safe transportation of hazardous materials would be required for the Warehousing and Manufacturing Option. Appropriate documentation would be provided for all hazardous waste that are transported during operations of the Warehousing and Manufacturing Option. Similar to the Warehouse Only Option, compliance with all applicable Federal and State laws related to the transportation of hazardous materials would reduce the likelihood and severity of accidents during transit, thereby ensuring that a less than significant, cumulatively considerable, impact would occur in this regard.

Compliance with all Federal, State, and local regulations during the construction and operation of new developments would ensure that there are no cumulatively considerable significant hazards to the public or the environment associated the routine transportation, use, disposal, or release of hazardous materials. Thus, impacts would not be cumulatively considerable with implementation of Mitigation Measure HAZ-1 for the Warehousing and Manufacturing Option.



Standard Conditions of Approval: No standard conditions of approval are applicable.

Mitigation Measures: Refer to Mitigation Measure HAZ-1.

Level of Significance: Less Than Significant Impact With Mitigation Incorporated.

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.