APPENDIX F
CEQA Hazards and Hazardous Materials Memorandum
CEQA HAZARDS AND HAZARDOUS MATERIALS MEMORANDUM

To: Frank Lac, Owner, Arroyo Development LLC
From: Kristen Bogue, Michael Baker International
Date: June 6, 2019
Subject: Arroyo Village Residential Condominium Project – CEQA Hazards and Hazardous Materials Memorandum

This CEQA Hazards and Hazardous Materials Memorandum (Memorandum) was prepared in an effort to preliminarily identify the potential for accidental conditions to occur during site disturbance activities within the boundaries of the proposed Arroyo Village Residential Condominium Project (project) for the purposes of CEQA compliance. Michael Baker International’s (Michael Baker’s) opinions and recommendations presented in this Memorandum, are limited to our scope of work, which included a review of available online public records (GeoTracker maintained by the State Water Resources Control Board [SWRCB] and EnviroStor maintained by the Department of Toxic Substances Control [DTSC]), as well as the State Cortese Database Listing, maintained by the California Environmental Protection Agency (CalEPA).

For the purposes of this Memorandum, 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).

PROJECT LOCATION

The City of San Gabriel (City) is located in the San Gabriel Valley of Los Angeles County, approximately 11 miles east of the Los Angeles Civic Center; refer to Exhibit 1, Regional Vicinity. The City consists of 4.09 square miles. Surrounding jurisdictions include the cities of San Marino and Temple City to the north, Temple City, unincorporated County of Los Angeles, and Rosemead to the east, Rosemead to the south, and Alhambra to the west.

The project is approximately 1.12 acres and is located at 235 South Arroyo Drive in the City of San Gabriel (Assessor’s Parcel Numbers [APNs] 5346-011-001, -011-004, and -011-006); refer to Exhibit 2, Site Vicinity. A limited portion of the project site is located in the City of Alhambra at APNs 5346-008-031, -009-008, and -009-010. Regional access to the project site is provided via the San Bernardino Freeway (Interstate 10) or the Foothill Freeway (Interstate 210). Local access to the project site is provided by Arroyo Drive.
EXISTING CONDITIONS

The northern portion of the project site is currently developed with an existing two-story single-family residential building totaling approximately 2,895 square feet. The Los Angeles County Flood Control District-owned Alhambra Wash traverses the project site in a northeast to southeast direction. The remainder of the project site is vacant land. On-site site topography varies and slopes to the southeast and southwest toward the wash. The project site is surrounded by the following land uses:

- **North:** Residential uses are situated to the north of the project site.
- **East:** The Alhambra Wash bounds the project site to the east with South Arroyo Drive and residential uses located east of the Alhambra Wash.
- **South:** Areas to the south of the project site include vacant land associated with the Alhambra Wash and residential uses.
- **West:** Areas to the west of the project site are located within the City of Alhambra’s jurisdiction and include residential uses.

On-Site Structures

Many older buildings contain building materials that can be hazardous to people and the environment once disturbed. These materials include lead-based paints (LBP) and asbestos-containing materials (ACMs). In the last 25 years, LBP has been phased out of use due to concerns over the health effects associated with lead. Additionally, prior to the 1940s and up until the early 1970s, ACMs were used in many building materials and can result in serious health problems if inhaled. The existing single-family residential building as constructed in 1947. Thus, LBP and ACMs may be present.

EXISTING REGULATORY DATABASE INFORMATION

Geotracker

Michael Baker searched the online GeoTracker database maintained by SWRCB for file information relative to the project site and adjoining properties of concern in May 2019. GeoTracker was developed pursuant to a mandate by the California State Legislature to investigate the feasibility of establishing a statewide Geographic Information System (GIS) for leaking underground storage tanks (LUST) sites and is maintained by the SWRCB. Michael Baker makes no claims as to the completeness or accuracy of GeoTracker; our review of GeoTracker’s findings can only be as current as their listings and may not represent all known or potential hazardous waste or contaminated sites.

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1. First American Real Estate Solutions, RealQuest Property Data, accessed on May 15, 2019.
GeoTracker did not report any regulatory properties within the boundaries of the project site or adjoining the project site.\textsuperscript{2} No known corrective action, restoration, or remediation has been planned, is currently taking place, or has been completed on the project site pursuant to the SWRCB. The project site has not been under investigation for violation of any environmental laws, regulations, or standards for the SWRCB, as identified in the GeoTracker database.

**EnviroStor**

Michael Baker searched the EnviroStor database for file information relative to the project site and adjoining properties of concern in May 2019. EnviroStor is an online search and GIS tool maintained by the DTSC that identifies sites with known contamination or sites for which there may be reasons to investigate further. It also identifies facilities that are authorized to treat, store, dispose of, and/or transfer hazardous waste. EnviroStor includes lists of the following site types: Federal Superfund sites (National Priority List); State Response, including Military Facilities and State Superfund; Voluntary Cleanup; and School sites. EnviroStor provides site name, site type, status, address, any restricted use (recorded deed restrictions), past use(s) that caused contamination, potential contaminants of concern, potential environmental media affected, site history, and planned and completed activities. Michael Baker makes no claims as to the completeness or accuracy of EnviroStor; our review of EnviroStor’s findings can only be as current as its listings and may not represent all known or potential hazardous waste or contaminated sites.

EnviroStor did not report any regulatory properties within the boundaries of the project site or adjoining the project site.\textsuperscript{3} No known corrective action, restoration, or remediation has been planned, is currently taking place, or has been completed on the project site. The project site has not been under investigation for violation of any environmental laws, regulations, or standards, as identified in the EnviroStor database.

However, EnviroStor identified one Superfund Site in the vicinity of the project site. The following Superfund Site is of concern:

**San Gabriel Valley Superfund Site (Area 3)**

In 1984, the discovery of widespread groundwater contamination prompted the U.S. Environmental Protection Agency (EPA) to add four areas in the San Gabriel Valley (Areas 1 through 4) to the National Priorities List (NPL) of the hazardous waste sites that are eligible for cleanup under the Superfund process. The four San Gabriel Valley Superfund sites include areas of groundwater contamination underlying approximately 30 square miles of the 170-square-mile Valley. Regional groundwater contamination is a result of decades of improper handling and disposal practices that released industrial solvents called volatile organic compounds (VOCs) into the soil and groundwater. VOCs are commonly used in dry cleaning, paint stripping, metal plating, and machinery degreasing.


The project site is situated in the vicinity of Area 3. EPA has collected data in Area 3 continually since 1999. Area 3 consists of a large area (19 square miles) of contaminated groundwater that contains many potential contaminant sources. Based on the San Gabriel Valley Area 3 Superfund Site Ground Water Monitoring Summary Report 2008-2012, eight groundwater monitoring wells were installed and sampled annually. Groundwater analytical results detected tetrachloroethylene (PCE), trichloroethylene (TCE), cis-1,2,3-trichloropropane (1,2,3-TCP), carbon tetrachloride, and perchlorate, which exceeded the EPA’s Maximum Contaminant Levels. The EPA is currently characterizing the extent of groundwater contamination at the site and will use these findings to identify and evaluate groundwater cleanup options. The EPA expects complete identification and characterization of the contaminated groundwater in 2019.4

Cortese

Government Code Section 65962.5 (also known as the “Cortese List”) requires DTSC and SWRCB to compile and update the regulatory sites listing. 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 California Code of Regulations (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 the CalEPA’s Cortese List Data Resources, the site is not reported on a list maintained pursuant to Government Code Section 65962.5.5

PROJECT DESCRIPTION

The project proposes to demolish the existing on-site single-family residential building to construct a new four-story residential building encompassing 41 condominium units totaling approximately 55,000 square feet with a 36,000 square foot underground parking garage; refer to Exhibit 3, Conceptual Site Plan. In addition, a vehicular bridge with a pedestrian walkway would be installed at the southern portion of the project site (over the Alhambra Wash) to provide project access at South Arroyo Drive; refer to Exhibit 4, Conceptual Bridge Plan.

CEQA THRESHOLDS OF SIGNIFICANCE

Appendix G, Environmental Checklist Form, of the CEQA Statutes and Guidelines contains analysis guidelines related to the assessment of hazardous materials. These guidelines have been utilized as thresholds of significance for this analysis. As stated in Appendix G, a project may create a significant environmental impact if one or more of the following occurs:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;

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- Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment;

- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing school or proposed school; and

- 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.

**IMPACT ANALYSIS**

The following findings, opinions, and conclusions are based upon review of reasonably ascertainable referenced material available to Michael Baker during the preparation of this Memorandum, which included a review of available online public records (GeoTracker maintained by SWRCB and EnviroStor maintained DTSC), as well as the State Cortese Database Listing, maintained by CalEPA (refer to Table 1, *CEQA Appendix G Hazardous Materials Checklist*):

**Table 1**

<table>
<thead>
<tr>
<th>Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant Impact With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?</td>
<td></td>
<td></td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>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?</td>
<td></td>
<td></td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?</td>
<td></td>
<td></td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>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?</td>
<td></td>
<td></td>
<td>✓</td>
<td></td>
</tr>
</tbody>
</table>
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Exposure of the public or the environment to hazardous materials could occur through improper handling or use of hazardous materials or hazardous wastes particularly by untrained personnel, a transportation accident, environmentally unsound disposal methods, or fire, explosion, or other emergencies. The severity of potential effects varies with the activity conducted, the concentration and type of hazardous material or wastes present, and the proximity of sensitive receptors.

Construction

Project construction could expose construction workers and the public to temporary hazards related to the transport, use, and maintenance of construction materials (i.e., oil, diesel fuel, transmission fluid, etc.). These activities would be short-term, and the materials used would not be in such quantities or stored in such a manner as to pose a significant safety hazard. All project construction activities would demonstrate compliance with the applicable laws and regulations governing the use, storage, and transportation of hazardous materials, ensuring that all potentially hazardous materials are used and handled in an appropriate manner. Impacts concerning the routine transport, use, or disposal of hazardous materials during project construction would be less than significant.

Operations

Substantial risks associated with hazardous materials are not typically associated with residential uses. Minor cleaning products along with the occasional use of pesticides and herbicides for landscape maintenance of the project site are generally the extent of hazardous materials that would be routinely utilized on-site. Thus, as the presence and on-site storage of these materials are common for residential uses and would not be stored in substantial quantities (quantities required to be reported to a regulatory agency), impacts in this regard are less than significant.

Mitigation Measures: No mitigation measures are required.

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?

Less Than Significant Impact.

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 hazardous substances in on-site structures and groundwater. The following analysis considers potential disturbance of hazardous materials on-site during demolition/construction.

On-Site Structures

Construction activities would include demolition of the existing single-family residential building. This on-site structure may be associated with hazardous materials (e.g., ACMs and/or LBP), as it was constructed in 1947. 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. Asbestos removal would be performed in accordance with the South Coast Air Quality Management District (SCAQMD) Rule 1403. Lead-based paint removal and disposal would be performed in accordance with CCR Title 8, Section 1532.1. Compliance with Federal and State regulations, including SCAQMD Rule 1403 and CCR Title 8, Section 1532.1, would reduce potential impacts in this regard to less than significant levels.

Regional Contaminated Groundwater

The project site is located in the vicinity of the San Gabriel Valley Superfund Site (Area 3). As a result of the superfund action investigation, eight groundwater monitoring wells were installed and sampled annually. Groundwater analytical results detected PCE, TCE, 1,2,3-TCP, carbon tetrachloride, and perchlorate which exceeded the EPA’s Maximum Contaminant Levels. Based on the Los Angeles Public Works Groundwater Wells Database, depth to groundwater in the site vicinity ranges from approximately 245 to 281 feet below ground surface (bgs). The proposed underground parking garage would excavate to a depth of approximately 24 feet bgs. Therefore, groundwater is not anticipated to be encountered and impacts in this regard would be less than significant.

Operations

Refer to Response (a) for a description of impacts related to project operations. Impacts in this regard would be less than significant.

Mitigation Measures: No mitigation measures are required.

c) **Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

Less Than Significant Impact. Three existing schools are situated within 0.25-mile of the project site (Paramount Academy located 0.12-mile northwest, Granada Elementary School located 0.14-
mile southwest, and Growing Time Montessori School located 0.17-mile east of the site). The project is anticipated to involve the demolition of the existing single-family residential building, 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. These activities would be required to comply with Federal, State, and local laws and regulations regarding the handling and transport of hazardous materials. With compliance with Federal, State, and local laws and regulations, the project would result in less than significant impacts involving the handling of hazardous materials, substances, or waste within the vicinity of these schools.

**Mitigation Measures:** No mitigation measures are required.

**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?**

**No Impact.** The project site is not listed pursuant to Government Code Section 65962.5.\(^8\) Thus, no impact would result in this regard.

**Mitigation Measures:** No mitigation measures are required.

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