5.5 HAZARDS AND HAZARDOUS MATERIALS

This section of the DEIR evaluates the hazards and hazardous materials within the Puente Hills Intermodal Facility (PHIMF) project vicinity. The analysis in this section is based in part on the following technical reports:

- *Phase I Environmental Site Assessment*, TRC Companies, Inc., March 14, 2005.
- *Environmental Site Assessment Report,* TRC Companies, Inc., July 22, 2005.

Complete copies of these studies are included in the Appendix F in Volume IIB of this DEIR. Geologic hazards and flood hazards are addressed separately in Section 5.4, *Geology and Soils*, and Section 5.6, *Hydrology and Water Quality*, respectively. Water quality and pollutant discharge issues are also addressed in Section 5.6.

5.5.1 Environmental Setting

5.5.1.1 Environmental Context

Project Site Conditions

The PHIMF project site is an approximately 17.2-acre site in the City of Industry. The site has been assigned Assessor's Parcels Numbers 8125-018-914 and 8125-018-913. An industrial/warehouse building, approximately 457,000 square feet in size, currently occupies the site. Asphalt-paved parking areas surround the building and minimal landscaped areas exist as planters in the parking areas. The Union Pacific Railroad (UPRR) abuts the southeast property line of the PHIMF site.

Historical Property Usage

Based on a summary compilation of historical information sources reviewed, the project site and its general area were used for agricultural purposes until the 1960s. In 1978, the existing industrial/warehouse building was constructed, with improvements added through 1990. The project site has two street addresses: the eastern and central portions of the building are at 2500 Pellissier Place and the western portion of the building is at 2520 Pellissier Place. The subject property was first occupied by Montgomery Ward and used as an office/distribution center. Between 1989 and 1991, the building was remodeled by Home Savings of America for use as an office and warehouse. The eastern and western portions of the building were later occupied by Washington Mutual Bank until 2003. Between 1994 and 2001, Matco United, a distributor of paper goods, janitorial products and water-based adhesives, occupied the western part of the building.

5.5.1.2 Regulatory Setting

Various federal and state regulations and programs regulate the use, storage, and transportation of hazardous materials. Regulations can be used to reduce or mitigate the danger that hazardous substances may pose to the PHIMF employees and to workers and residents within the surrounding communities, both in normal day-to-day conditions and as a result of a regional disaster, such as an earthquake or major flood. Key federal and state regulatory programs are summarized in the following paragraphs.

Comprehensive Environmental Response, Compensation and Liability Act

The Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) is a regulatory law developed to protect the water, air, and land resources from the risks created from past chemical disposal practices. This law is also referred to as the Superfund Act and regulates sites on the National Priorities List (NPL), which are referred to as Superfund Sites.

Emergency Planning and Community Right-to-Know Act

The primary purpose of the Federal Emergency Planning and Community Right-to-Know Act (EPCRA) of 1986 is to inform communities and citizens of chemical hazards in their areas. Sections 311 and 312 of the EPCRA require businesses to report the location and quantities of chemicals stored on-site to state and local agencies. Under section 313 of EPCRA, manufacturers are required to report chemical releases for more than 600 designated substances. In addition to releases of chemicals, the facilities are also required to report off-site transfers of waste for treatment or disposal at separate facilities, pollution prevention measures and activities, and chemical recycling. The United States Environmental Protection Agency (EPA) maintains the Toxic Release Inventory (TRI) database to document this information, which is reported annually by regulated facilities.

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) is the principal federal law that regulates the generation, management, and transportation of hazardous waste materials. Hazardous waste management includes the treatment, storage, or disposal of hazardous waste.

Additionally, Los Angeles County, the City of Industry, and other cities in the county have jointly developed the Los Angeles County Integrated Waste Management Plan and Hazardous Waste Management Plan (IWMP and HWMP) to locally address the disposal, handling, processing, storage, and treatment of solid and hazardous materials and waste products. The IWMP and HWMP assure that adequate treatment and disposal capacity would be available to manage the solid and hazardous wastes generated within the jurisdiction. To implement the IWMP and HWMP, the Los Angeles County Fire Department (LACFD), Health Hazardous Materials Division, maintains a list of small-quantity hazardous waste generator operations within the vicinity of the project site. The EPA defines a small-quantity generator as a facility that produces between 100 and 1,000 kilograms (kg) of hazardous waste per month. Generators of 100 kg or less of hazardous waste per month are conditionally exempt. The EPA also maintains a list of large-quantity generators, which are facilities that produce over 1,000 kg of hazardous waste per month and are fully regulated under the RCRA. All generators within the jurisdiction of the LACFD are required to obtain a hazardous waste generator license (LA Co. Ord. 12.50.075).

Hazardous Materials Release Notification

Many state statutes require emergency notification of a hazardous chemical release:

- Health and Safety Code Sections 25270.7, 25270.8, and 25507
- Vehicle Code Section 23112.5
- Public Utilities Code Section 7673 (PUC General Orders #22-B, 161)
- Government Code Sections 51018 and 8670.25.5(a)
- Water Code Sections 13271 and 13272
- California Labor Code Section 6409.1(b)10

According to the California Labor, Code Section 6409.1(b), requirements for immediate notification of all significant spills or threatened releases are applicable to owners, operators, persons in charge, and employers. Notification is required regarding significant releases from facilities, vehicles, vessels, pipelines, and railroads. In addition, all releases that result in injuries or workers being harmfully exposed must be immediately reported to the California Occupational Safety and Heath Administration (Cal/OSHA).

Hazardous Materials Disclosure Programs

The Unified Program administered by the State of California consolidates, coordinates, and makes consistent the administrative requirements, permits, inspections, and enforcement activities for the environmental and emergency management programs, which include Hazardous Materials Release Response Plans and Inventories (business plans), the California Accidental Release Prevention (CalARP) Program, and the Underground Storage Tank Program. The Unified Program is implemented at the local government level by Certified Unified Program Agencies (CUPAs).

Hazardous Materials Business Plans

Both the federal government (Code of Federal Regulations or CFR) and the State of California (California Health and Safety Code) require any business that handles more than a specified amount of hazardous or extremely hazardous materials, termed a "reportable quantity," to submit a Hazardous Materials Business Plan to its CUPA, which for the City of Industry is the LACFD, Health Hazardous Materials Division. The reportable quantity defined under the Uniform Fire Code (UFC). Reportable quantities specified by the LACFD are outlined in Table 5.5-1.

Business plans must include an inventory of the types, quantities, and locations of hazardous materials at the facility. Businesses are required to update their business plans at least once every three years and the chemical portion of their plan every year. Also, business plans are required to include emergency response plans and procedures to be used in the event of a significant or threatened significant release of a hazardous material. These plans need to identify the procedures to follow for immediate notification to all appropriate agencies and personnel of a release, identification of local emergency medical assistance appropriate for potential accident scenarios, contact information for all company emergency coordinators, a listing and location of emergency equipment at the business, an evacuation plan, and a training program for business personnel. The requirements for hazardous materials business plans are specified in the California Health and Safety Code and Title 19 of the California Code of Regulations.

The LACFD, Health Hazardous Materials Division currently reviews submitted business plans and updates. Businesses that handle hazardous materials are required by law to provide an immediate verbal report of any release or threatened release of hazardous materials if there is a reasonable belief that the release or threatened release poses a significant present or potential hazard to human health and safety, property, or the environment. The division is also charged with the responsibility of conducting compliance inspections of regulated facilities in Los Angeles County.

Table 5.5-1
Los Angeles County Fire Department Reporting Quantities for Hazardous Materials

	Hazardous Materials Categories	UFC Permit Amount[1]	CUPA Amount[2]
Physical Hazards	1. Explosives and blasting agents i. high explosives ii. low explosives iii. blasting agents	Any amount	Any amount
	1. Compress gases i. flammable ii. oxidizing iii. highly toxic iv. highly toxic v. toxic vi. inert (chemically unreactive) vii. pyrophoric viii. unstable (reactive)	 200 cubic feet 500 cubic feet Any amount Any amount — 6,000 cubic feet Any amount Any amount	 200 cubic feet 200 cubic feet Any amount Any amount 200 cubic feet 200 cubic feet Any amount Any amount
	3. Flammable and combustible liquids i. flammable liquids: class I-A, class I-B, class I-C ii. combustible liquids: class II, class III-A, class III-B	 5/10 gallons 25/60 gallons	 5/10 gallons 25/55 gallons
	4. Flammable solids i. organic solids ii. inorganic solids iii. combustible metals (except dusts and powders), iv. combustible dusts and powders (including metals)	100 pounds	100 pounds
	5. Oxidizers i. gases ii. liquids, iii. solids: class 4 class 3 class 2 class 1	 500 cubic feet Any amount 1 gallon/50 pounds 10 gallons/100 pounds 55 gallons/500 pounds	 200 cubic feet Any amount 1 gallon/50 pounds 10 gallons/100 pounds 55 gallons/500 pounds
	6. Organic peroxides i. liquids, ii. pastes, iii. solids unclassified class I class II class III class IV class V	 — Any amount Any amount 10 pounds 20 pounds —	 Any amount Any amount Any amount 1 gallon/10 pounds 2 gallons/20 pounds 55 gallons/500 pounds
	7. Pyrophoric materials i. gases ii. liquids iii. solids	Any amount	Any amount
	8. Unstable (reactive materials) i. class 4 ii. class 3 iii. class 2 iv. class 1	 Any amount Any amount 10 gallons/100 pounds 55 gallons/500 pounds	 Any amount Any amount 10 gallons/100 pounds 55 gallons/500 pounds

Table 5.5-1
Los Angeles County Fire Department Reporting Quantities for Hazardous Materials

Hazardous Materials Categories		UFC Permit Amount[1]	CUPA Amount[2]
	9. Water-reactive materials		
	i. class 3	Any amount	Any amount
	ii. class 2	10 gallons/100 pounds	10 gallons/100 pounds
	iii. class 1	55 gallons/500 pounds	55 gallons/500 pounds
	10. Cryogenic fluids		
	i. flammable	1/60 gallons	1/60 gallons
	ii. oxidizing	50 gallons	50 gallons
	iii. corrosive	1 gallon	1 gallon
	iv. inert (chemically unreactive)	—	60 gallons/500 pounds
	v. highly toxic	1 gallon	1 gallon
	vi. compressed	60/500 gallons	60/500 gallons
Health Hazards	1. Highly toxic and toxic materials		
	i. highly toxic: gases, liquids, solids	Any amount	Any amount
	ii. toxic: gases, liquids, solids	—	55 gallons/500 pounds
	2. Radioactive Materials	1 microcurie	Any amount
	i. common radiation source materials		
	ii. fissile materials		
	3. Corrosives	55 gallons	55 gallons/500 pounds
	i. acids		
	ii. bases (alkalis)		
	iii. other corrosives		
	4. Other health hazards	55 gallons/55 pounds	55 gallons/500 pounds
	i. carcinogens or suspected carcinogens		
	ii. target organ toxins		
	iii. irritants		
	iv. sensitizer		

Source: County of Los Angeles Fire Department, Hazardous Materials Categories and Disclosure Amounts, http://www.lafd.org/prevention/pdfforms/88_hm_cat_dis_amnts.pdf.
[1] Uniform Fire Code Permit Amount.
[2] The LACFD as the CUPA has more restrictive permit amounts.

California Accidental Release Prevention Program

CalARP became effective on January 1, 1997, in response to Senate Bill 1889. The CalARP aims to be proactive and therefore requires businesses to prepare Risk Management Plans (RMPs), which are detailed engineering analyses of the potential accident scenarios present at a business and the mitigation measures that can be implemented to reduce the possibility or adverse outcome of an accident involving a hazardous materials release. This requirement is coupled with the requirements for preparation of a hazardous materials business plan.

Leaking Underground Fuel Tanks

Leaking underground storage tanks (USTs) have been recognized since the early 1980s as the primary cause of groundwater contamination by hydrocarbon fuel compounds and solvents. In California, regulations aimed at protecting against UST leaks have been in place since 1983 (California Health and Safety Code), one year before the federal RCRA was amended to add Subtitle I requiring UST systems to be installed in accordance with standards that address the prevention of future leaks (CFR). The State Water Resources Control Board (SWRCB) has been designated the lead regulatory agency in the development of UST

regulations and policy. The state and federal UST regulations are enforced by the various California Regional Water Quality Control Boards (RWQCBs).

Older tanks are typically single-walled steel tanks. Many of these have leaked as a result of corrosion and detached fittings. The State of California required the replacement of older tanks with new double-walled tanks and piping, with flexible connections and monitoring systems. UST owners were given a 10-year period, until December 22, 1998, to comply with the new requirements. However, many UST owners did not act by the deadline, so the state granted an extension for the Replacement of Underground Storage Tanks (RUST) program to January 1, 2002. Tanks that have not been upgraded or replaced are out of compliance with this requirement. The California RWQCBs, in cooperation with the California Office of Emergency Services (OES), maintains an inventory of leaking underground fuel tanks (LUFTs) in a statewide database.

Superfund Amendments and Reauthorization Act

In 1986, Congress passed the Superfund Amendments and Reauthorization Act (SARA). Title 5 of this law requires that each community establish a Local Emergency Planning Committee (LEPC) that is responsible for developing an emergency plan for a chemical emergency in that community that includes:

- An identification of local facilities where hazardous materials are present or transportation routes that may be used to convey hazardous materials;
- The procedures for immediate response in case of an accident (this must include a community-wide evacuation plan);
- A plan for notifying the community that an incident has occurred;
- The names of response coordinators at local facilities; and
- A plan for conducting exercises to test the plan.

The emergency plan is reviewed by the State Emergency Response Commission (SERC) and publicized throughout the community. The LEPC is required to review, test, and update the plan each year. The Los Angeles County Department of Public Social Services (DPSS) is the agency responsible for disaster preparedness planning and appropriate response efforts with city departments, as well as local and state agencies. The DPSS coordinates planning efforts with other agencies, including County support departments, the County Office of Education, the Los Angeles Chapter of the Red Cross, Emergency Network Los Angeles/Los Angles Voluntary Agencies Active in Disasters (ENLA), the Grocery Industry Mutual Aid Council, and other agencies (DPSS 2003). The goals are to improve public and private sector readiness, and to mitigate local impacts resulting from natural or man-made emergencies.

5.5.1.3 Potential Environmental Conditions of Concern

On-Site Recognized Environmental Conditions

A reconnaissance of the project site was conducted by TRC on January 27, 2005, to determine the current and former uses of the PHIMF project site to identify potential Recognized Environmental Conditions (RECs). American Society for Testing and Materials (ASTM) Guidelines (E 1527-05) define RECs as "the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, ground water, or surface water of the property." The term includes hazardous substances or petroleum products even under conditions in compliance with the law. The term is not intended to include de minimis conditions that generally do not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of the appropriate governmental agencies. Potential RECs

associated with historical and existing property usage of the PHIMF site, as identified by TRC on January 27, 2005, are described below:

Existing RECs

An elevator is located in the eastern portion of the building at 2500 Pellissier Place, which was most recently occupied by Washington Mutual. Hydraulic equipment associated with the elevator is in an enclosed room on the second floor of the building. There is a 50-gallon aboveground storage tank (AST) for hydraulic fluid is this area. No staining was observed on the vinyl floor tiles within the hydraulic equipment room. Consequently, this is not considered an REC for the project site.

A print shop operated by Washington Mutual was located on the first floor of the building. At the time of the site reconnaissance, all equipment associated with the print shop had been removed. Floor tiles in portions of the print shop were heavily stained with an undetermined substance. Consequently, this was determined to be a REC for the project site.

A photo development room was formerly operated adjacent to the print shop. All equipment associated with photo development had been removed from the building. Some staining was observed on the vinyl floor tiles in the photo development room, particularly in the vicinity of the former sink area. Consequently, this was determined to be a REC for the project site.

A mechanical room was located in the northern portion of the building. A 500-gallon AST, formerly containing ethylene glycol used for the building's cooling system, was observed in the mechanical room. No stains or floor drains were observed on the concrete floor in the mechanical room or adjacent warehouse area. Consequently, this is not considered a REC for the project site.

A small former equipment repair shop was located to the northeast of the warehouse. Vents were observed around the periphery of the room. Two wall-mounted signs indicating the use of corrosive materials were also observed in the repair shop area. A small sump/floor drain was observed in the northwestern part of the equipment repair room, but no significant stains were observed on the concrete floor area. Consequently, this is not considered a REC for the project site.

The western portion of the building located at 2520 Pellissier Place primarily consisted of offices in the northwestern portion and empty warehouse space in the remaining area. No significant stains or floor drains were observed in the warehouse area. Consequently, this is not considered a REC for the project site.

Two emergency electrical generators were observed on the north side of the building. According to a records review, a 10,000-gallon UST is located immediately to the northeast of the generators. This UST reportedly contained diesel fuel used to power the emergency electrical generators. Each generator also included an aboveground day tank containing diesel fuel. Each day tank had a capacity of approximately 15 gallons. Two portable, secondary containment devices were observed near the electrical generators. One of these storage containers was designed to store a single 55-gallon drum and was empty during the site reconnaissance. The other storage container was designed to store two 55-gallon drums and was observed to contain two partially full drums of ethylene glycol at the time of site inspection. Consequently, the UST, day tanks, and surrounding area were determined to be RECs for the project site.

At the southeastern portion of the PHIMF project site was a former hazardous materials storage area consisting of a bermed and covered concrete structure (fenced on one side, and concrete walls on three sides). Several plastic secondary containment pallets/spill racks were observed in this area, apparently for the former storage of drums. A sign indicating the former storage of 120 gallons of sodium hypochlorite was

observed on this structure. With the exception of the secondary containment pallets/spill racks, this area was empty and no drums or other containers were observed at the time of inspection. No significant stains were observed on the concrete floor within the hazardous materials storage structure. Due to the historical storage and use of hazardous materials at this location, this was determined to be a REC for the project site.

A total of 16 ASTs were observed to the south of the hazardous materials structure. The tanks were part of the heating, ventilation, and air-conditioning (HVAC) system and stored ethylene glycol for cooling the building during daytime hours. According to records reviewed at the County of Los Angeles Public Health Investigation Unit, these tanks contained a total of approximately 40,000 gallons of ethylene glycol; they were presumed to be full during the site reconnaissance. Due to the historical and existing storage and use of hazardous materials at this location, this was determined to be a REC for the project site.

Based on the construction date of the building (1978), asbestos-containing building materials may be present within the building envelope or associated with building infrastructure (e.g., HVAC system). Because of the age of the structure, lead-based paint may also be present. Consequently, this was determined to be a REC for the project site.

Historical RECs

TRC's review of City of Industry and Los Angeles County records revealed that a permit for a former 2,000-gallon UST for diesel fuel was issued in 1990. The 2,000-gallon UST was removed in 1996 under a permit issued by the Los Angeles County Department of Public Works (LADPW), and replaced with the 10,000-gallon UST that is still present. Subsurface soil sampling performed at the time the 2,000-gallon UST was removed did not indicate significant impacts to the subsurface. However, trace concentrations of diesel-range hydrocarbons were detected in soil beneath the former piping. The LADPW issued a case closure letter for this UST in 1997, indicating that no further action was required. However, residual hydrocarbons may be present in soil in the vicinity of the former piping. Consequently, this was determined to be a historical REC for the project site.

Environmental Regulatory Records Review

TRC obtained and reviewed an environmental database report that identifies facilities listed on databases maintained by federal and state environmental agencies. The database report was provided by Environmental Data Resources, Inc. (EDR) and includes facilities known to generate, store, dispose of, release, or otherwise handle hazardous materials and wastes. Depending on the database, facilities are identified within prescribed distances up to and including one mile from the site. The subject property was listed on the Haznet database for the shipment of hazardous waste under manifest by Home Savings of America. Waste materials identified included metal sludge, organic solids, and aqueous solutions.

Nearby Sites

Based on groundwater monitoring data for the Cintas facility at 2829 Workman Mill Road and the Shell Service Station at 2600 Pellissier Place, the direction of the groundwater flow in the general area of the project site is to the northwest and to the west/southwest, respectively. Facilities located to the southeast or east of the project site may be upgradient with respect to groundwater flow. Releases from these upgradient facilities may potentially impact the project site. TRC identified five within 1,300 feet (i.e., approximately one-quarter mile) of the PHIMF project site and analyzed their potential impacts with respect to the site:

- ***San Gabriel Valley, Area of Concern*.** In the San Gabriel Valley Superfund site, contamination of groundwater with volatile organic compounds (VOCs) was initially detected in Azusa wells in 1979.

By 1984, 59 wells were found to be contaminated with high levels of various VOCs. The primary contaminants identified in groundwater associated with the San Gabriel Valley Superfund site are perchloroethylene (PCE) and trichloroethylene (TCE). The San Gabriel Valley was placed on the NPL in 1984. The San Gabriel Valley NPL site has been divided into various Operable Units (OU); the project site is located within the Whittier Narrows OU. This area is also referred to as the San Gabriel Valley Area 1. The Whittier Narrows OU is just north of the Whittier Narrows Dam and separates the San Gabriel Basin from the Central Basin. It includes the area south of the Pomona Freeway and north of the Montebello Forebay area of the Central Basin. A groundwater treatment system to pump and treat 11,000 gallons per minute (gpm) was constructed and has been operating since 2002.

The Los Angeles Regional RWQCB, working under a Cooperative Agreement with the EPA, has also been involved in identifying sources of contaminants in the San Gabriel Valley Superfund area. The RWQCB's program is called the Well Investigation Program (WIP). The subject property has not been investigated as part of this program. However, the EDR report identified an Area of Concern (AOC) near the rail lines, to the southeast of the project site. Based on physical inspection of the general area, the Cintas facility at 2829 Workman Mill corresponds to this AOC. The facility was investigated as part of the WIP (File No. 114.1978) and is located adjacent to the Zee Medical property (Parcel A), which would be used to construct the off-site access road. As discussed in Section 5.4.3, it is possible that groundwater could be encountered during construction of the access road and/or reconfiguration of the San Jose Creek box culvert.

One report on the Cintas site was identified in the Los Angeles RWQCB files (Second Semi-Annual Groundwater Monitoring and Sampling Report, prepared for Cintas, Inc., prepared by ATC Associates, dated December 8, 1999 [ATC Report]). Based on information provided in the ATC Report, Unitog Rental Services operated an industrial laundry at this location and on-site dry-cleaning operations were reportedly performed between 1976 and 1991. The primary contaminant detected in subsurface soil and groundwater at the Cintas facility is PCE, a solvent commonly used in dry cleaning. According to the ATC Report, soil remediation was implemented at this site between November 1995 and February 1997. In addition, groundwater monitoring and sampling were performed between at least 1994 and 1999. Three groundwater wells (MW-1, MW-2, and MW-3) were installed on the northern portion of the Cintas facility in the vicinity of the rail lines. Based on the detection of PCE in groundwater beneath the Cintas site at concentrations up to 70 micrograms per liter (μg/l), there is a high likelihood that groundwater beneath the PHIMF site and Parcel A has been affected by PCE contamination. However, no information regarding groundwater monitoring and sampling results since September 1999 were identified in the reviewed Los Angeles RWQCB files.

WIP files were also reviewed for the following adjoining or nearby properties: 2601 Workman Mill Road–Consolidated Converting Co.; 2845 Workman Mill Road–Zee Medical Services; and 2727 Workman Mill Road–WWF Paper Corp. West. Parcel A would be acquired by County Sanitation District No. 2 of Los Angeles County (LACSD) to construct the off-street access road between the PHMRF and PHIMF. Joint No Further Action (NFA) letters from the EPA and the Los Angeles RWQCB were issued for these three WIP sites in 1997. Given the NFA status of these sites, it is unlikely that the PHIMF project site or off-site improvement areas have been impacted by releases from these facilities.

- ***Shell Service Station, 2600 Pellissier Place.*** This site is approximately 700 feet to the southwest of the subject property and was listed on the UST database for the registration of five USTs. This site was also listed on the Leaking UST database for a gasoline leak reported in 2002. The groundwater has been affected by this release. Six groundwater monitoring wells and six dual-phase extraction

wells have been installed at this site. Methyl tert-butyl ether (MTBE), a fuel oxygenate associated with reformulated gasoline, appears to be the primary contaminant at this site. In general, the highest concentrations of MTBE detected in groundwater occur on the eastern boundary of the facility. The lateral extent of MTBE-impacted groundwater has not been defined, but is anticipated to extend off-site to the adjacent Delta property at 2550 Pellissier Place. The recent maximum MTBE concentration detected in groundwater is associated with Monitoring Well MW-5 (570 μg/l). Historically, MTBE has been detected in this well at concentrations ranging from 130 to 5,100 μg/l. Based on the distance and downgradient direction from the project site and the measured contaminant concentrations in groundwater, it is unlikely that the project site has been impacted by a release from the Shell Service Station.

- ***Peck Road Ford Truck Sales, 2450 Kella Avenue.*** This site is approximately 900 feet to the north-northwest of the subject property and was listed on the UST database (including the Historical UST and Hazardous Materials Sites [HMS] databases) for the operation of one waste oil tank. This UST was reportedly removed and is no longer in operation. This facility was also listed on the small-quantity generator database (RCRA) and on the Haznet database (for shipment of waste under the hazardous waste manifest system). Waste materials generated at this facility reportedly include waste oil, oil/water separation sludge, and aqueous solution with organic residues. No violations were noted in the EDR report for this facility. Based on the lack of reported violations or releases, as well as the distance and downgradient direction from the project site, it appears unlikely that a release from this facility would have affected the project site.

- ***Cook Industries, 2425 Kella Avenue.*** This facility is approximately 1,060 feet to the north-northwest of the subject property and was listed on the Leaking UST database for a gasoline leak reported in 1989. Only the soils were reported as affected by this leak and it appears that the area has been remediated. Based on the distance and downgradient direction from the project site and the absence of reported groundwater impacts, it appears unlikely that the release from this site would have affected the project site.

- ***Johnson Machinery Co., 2600 South Peck Road.*** This site is approximately 1,260 feet to the west-southwest of the subject property and was listed on the Leaking UST database for a waste-oil leak reported in 1991. Only the soils were reported as affected by this leak. It appears that the area has been remediated and the LUST case was closed in 1996. Based on the distance, downgradient direction, type of leaked substance, and absence of reported groundwater impacts, it is unlikely that the release from this site would have affected the project site.

The following sites are located within 650 feet of the project site and were also listed on the RCRA small-quantity generators database and/or the Haznet database:

- Delta Technical Coating, 2550 Pellissier Place
- Yale Chase Materials Handling, 2615 Pellissier Place
- The Alignment Shop, 2441 Kella Avenue
- Hertz Equipment Rental, 2425 Kella Avenue
- Consolidated Converting, 2601 Workman Mill Road

No violations were noted by EDR at these sites. Based on type of listing and lack of reported violations or releases, it is unlikely that activities at these sites would have affected the project site.

Summary of Other Listed Hazardous Material Sites

The Puente Hills Landfill, operated by the LACSD, is located across Workman Mill Road south-southeast of the project site. TRC reviewed the most recent groundwater monitoring report for the Puente Hills Landfill to evaluate potential groundwater impacts to the project site from this source. The groundwater monitoring program includes a total of 25 on- and off-site groundwater monitoring wells. Five groundwater management barriers have been installed along the outlying canyon surrounding the landfill. The nearest groundwater monitoring well to the subject property is Well EMP-1, which is located approximately 500 to 1,000 feet to the southeast of the project site. No methane or VOCs were detected in this well. Based on these results, TRC concluded that operation of the Puente Hills Landfill does not appear to have affected groundwater in the vicinity of the project site.

Other sites were identified in the EDR report. However, due to distance, location with respect to groundwater flow, and type of contamination found (if applicable), it is unlikely that the project site would have been affected by releases from these other sites.

Other Conditions of Concern

Hazardous Materials Transportation Routes

The project site is located in close proximity to Interstate 605 (I-605) and the UPRR line, which abuts the southeast boundary of the PHIMF. Both the freeway and the railroad line are used to transport hazardous materials, posing a potential for spills or leaks. Trucks and trains carrying hazardous materials are required to have placards that indicate at a glance the chemicals being carried, and whether they are corrosive, flammable, or explosive. Train conductors and truck drivers are required to carry detailed Material Safety Data Sheets (MSDS) for each of the substances on board. These documents are designed to help emergency response personnel assess the situation immediately upon arrival at the scene of an accident, and take the appropriate precautionary and mitigation measures. The California Highway Patrol and the California Department of Transportation (Caltrans) are in charge of spills that occur on or along freeways, and local sheriff and fire departments are responsible for providing additional enforcement and routing assistance.

Pipelines Carrying Hazardous Materials

Natural gas pipelines in the vicinity of the project site are operated by The Gas Company (TGC). There are no major distribution or high-pressure pipelines within the vicinity of the PHIMF (see Volume IIA, Appendix B, *NOP Responses*). However, medium-pressure natural gas pipelines are present in the vicinity of the project site and cross the UPRR right-of-way at several local intersections. Under the guidelines of TGC and the UPRR, natural gas lines in the vicinity of the UPRR right-of-way are required be located at a minimum safe distance from the UPRR train tracks. As indicated in Section 5.11, *Utilities and Service Systems*, railroad modifications at the Crossroads Parkway North overpass, the Workman Mill Road grade crossing, and the Mission Mill Road grade crossings would require TGC to alter pipeline crossings at these locations to maintain safe operating clearance from the railroad tracks, per the UPRR and TGC guidelines.

Oil Gas and Geothermal

As shown on the map in the Department of Conservation, Division of Oil, Gas and Geothermal Resources (DOGGR) publication, *Oil, Gas and Geothermal Fields in California* (2001), no oil, gas, or geothermal fields are located within or adjacent to the PHIMF.

Airport and Heliport Hazards

There are no public or private airports or heliports within the immediate vicinity of the site. The closest airport is the El Monte Airport, located approximately 3.9 miles north of the proposed project site. There are four private heliports within the City of Industry; however, none are located within close proximity to the proposed project site. The closest heliports to the project site are the Presbyterian Intercommunity Hospital Heliport approximately one mile south of the site, the City of Industry County Sheriff's Department Heliport approximately five miles northeast of the site, and Haddick's Towing approximately four miles northeast of the site (Airnav 2006).

5.5.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

H-1 Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

H-2 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.

H-3 Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

H-4 Be located on a site which is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.

H-5 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 result in a safety hazard for people residing or working in the project area.

H-6 For a project in the vicinity of a private airstrip, result in a safety hazard for people residing or working in the project area.

H-7 Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

H-8 Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to the urbanized areas or where residences are intermixed with wildlands.

The Initial Study, included in Appendix A in Volume IIA of this DEIR, substantiates that the impacts associated with the thresholds listed below are less than significant:

- Threshold H-3
- Threshold H-5
- Threshold H-6

- Threshold H-8

Therefore, these issues will not be analyzed further in the DEIR.

5.5.3 Environmental Impacts

The following impact analysis addresses thresholds of significance for which the Initial Study disclosed potentially significant impacts. The applicable thresholds are identified in brackets after the impact statement.

IMPACT 5.5-1: ACCIDENTAL RELEASE OF HAZARDOUS MATERIALS ASSOCIATED WITH THE TRANSPORT, USE, AND/OR DISPOSAL OF HAZARDOUS MATERIALS DURING CONSTRUCTION OF THE PHIMF WOULD BE MINIMIZED THROUGH IMPLEMENTATION OF THE SWPPP. [THRESHOLDS H-1 AND H-2]

Impact Analysis: Construction of the PHIMF would involve temporary transport, use, and disposal of hazardous materials associated with construction of the PHIMF and the access corridor from the PHMRF and the UPRR railroad. Building materials, solvents, paints, and equipment fuel used for construction of the project improvements would be used and stored on-site. To prevent the accidental release of hazardous materials into the environment and provide for a proper response, the project contractor would be required to prepare and implement a Storm Water Pollution Prevention Plan (SWPPP; see Chapter 5.6, *Hydrology and Water Quality*). Precautionary measures would therefore be in place throughout the duration of construction activities to reduce potential impacts in this regard.

IMPACT 5.5-2: OPERATION OF THE PHIMF WOULD NOT CREATE A SIGNIFICANT HAZARD INVOLVING THE RELEASE OF HAZARDOUS MATERIALS TO THE ENVIRONMENT, BUT WOULD REQUIRE PREPARATION OF A SOLID WASTE SPILL CONTINGENCY PLAN. [THRESHOLDS H-1 AND H-2]

Impact Analysis: Operation of the PHIMF would require the on-site storage and use of hazardous materials for routine maintenance operations. Although the containerized municipal solid waste (MSW) that would be handled at the PHIMF is not supposed to contain hazardous waste, small amounts of household hazardous materials could be present. Other potential operational safety concerns that warrant evaluation include the possibility of landfill gas being generated in sealed containers and the potential waste releases resulting from train derailments. Project activities that could result in the accidental release of hazardous materials or waste into the environment are discussed in greater detail below.

On-Site Hazardous Materials Storage Areas

There would be two general areas on-site where hazardous materials would be used and/or stored. These areas are both associated with maintenance activities to support operations of the PHIMF. The general maintenance area would contain aboveground fuel storage tanks and a storage area for lubricants, engine coolants, and compressed gases for welding and other maintenance activities. The hazardous materials storage facility at this location would have a secondary containment system equipped with an oil-water separator. Additionally, the switch locomotive maintenance area would contain a small shed to store various lubricants and coolants. A secondary containment system would be installed in this maintenance area to collect and pump any released fluids, as necessary, to the oil-water separator. Construction of the secondary containment systems would ensure that groundwater is not impacted by on-site hazardous materials storage activities.

Furthermore, operation of the on-site hazardous materials storage area would require review and oversight by the LACFD, Health Hazardous Materials Division. The LACSD would be required to notify the LACFD of the hazardous materials stored on-site and, depending on the quantities of hazardous materials, prepare and submit a hazardous materials business plan. The LACSD would be required by law to provide an immediate verbal report of any release or threatened release of hazardous materials if there is a reasonable belief that the release or threatened release poses a significant present or potential hazard to human health and safety, property, or the environment. Preparation of the business plan and oversight from the LACFD would ensure that the impacts of a hazardous materials release at the project site would be minimized.

Municipal Solid Waste

MSW is not considered a hazardous material under state and federal regulations. However, containerized MSW can contain small quantities of household hazardous materials. Title 23, Section 25223 of the California Code of Regulations (CCR) defines MSW as garbage, trash, waste, paper, rubbish, industrial waste, ashes, appliances, food waste, and other materials that do not contain wastes but must be managed as hazardous waste or wastes with soluble pollutants in concentrations that exceed state water quality objectives. Very small quantities of household hazardous materials occasionally can be mixed with the MSW residue even after sorting and processing. State and federal laws and regulations regarding landfills require that environmental control systems be designed with the expectation that small amounts of these household hazardous wastes may be present in the MSW.

Prior to rail transport, the containerized MSW residue would be sorted at a transfer station/MRF, where any incidental hazardous materials and liquids would be removed from the waste stream. This would substantially reduce the amount of potentially hazardous materials contained in the MSW containers during transfer at the PHIMF and transport to the Mesquite Regional Landfill (MRL). Consequently, no significant impacts would occur regarding the potential for hazardous materials to be present in containerized MSW. However, unwanted release of containerized MSW into the environment is construed as a nuisance. In addition, byproducts of containerized MSW in an enclosed environment can create a safety hazard.

Accumulation of Landfill Gas

Trains carrying containerized MSW and delayed enroute to the MRL could accumulate landfill gas (LFG), which is the natural by-product of solid waste decomposition. It is approximately 40 to 60 percent methane and the remainder is mostly carbon dioxide (CO_2). Smaller fractions of nitrogen, oxygen, water vapor, and sulfur may also be present (EPA 1991). Containerized MSW that is stored at high temperatures for a significant amount of time could result in the buildup of LFG. Significant accumulations of LFG in the containers could result in an explosion (BLM 1995, Appendix F). According to the United States Mine Rescue Association, methane is explosive at concentrations between 5 to 15 percent. At concentrations greater than 15 percent, the amount of oxygen present is insufficient for rapid combustion to occur.

The sealed containers used for the transport of MSW would be leak proof, but generally not airtight. Thus, pressure buildup resulting from the generation of gas due to decomposition of organic material within the municipal solid waste is not expected to occur. The Final EIR/EIS for the MRL included an analysis for the for LFG accumulation in trains departing from Los Angeles County. The study showed that even during delays of several days, LFG production in the containers would occur at such small levels that it would not create an explosive hazard. The LACSD has conducted additional studies to evaluate the potential for gas buildup to occur in containers, as well as to assess potential odor impacts associated with the handling of containerized MSW, as explained below.

As operators of solid waste facilities for over 35 years, the LACSD has a great deal of experience with the formation of gas from decomposition of waste, as well as the odor-causing potential of stored waste. Applying this knowledge, the LACSD has recently begun a research study to present theoretical models of gas and odor formation in sealed containers. Based on commonly used theoretical models for LFG formation, the LACSD has modeled landfill gas and pressure buildup in containers over periods of time far longer than those expected under a worst-case condition for the proposed project. In general, it takes up to 20 days for any appreciable methane to be formed. Thus, it is unlikely that methane gas accumulation at explosive concentrations would occur under the proposed waste-by-rail operations.

To confirm these theoretical models for pressure buildup and LFG formation, the LACSD has also begun a series of field tests of containerized MSW. The testing regime includes daily readings of methane content, oxygen content, temperature, and pressure from the interior of containers filled with refuse and stored outdoors. The testing also includes laboratory and odor panel analyses of the containers' interior and exterior gas samples. Based on the theoretical models of methane gas formation and pressure buildup in sealed containers, appreciable levels of methane gas formation or extreme increases in internal container pressure would not occur in the time frame contemplated for waste-by-rail operations. Preliminary data from field tests conducted by the LACSD confirm these findings. Thus, this impact is considered less than significant.

Train Derailment

While the likelihood of derailment of trains carrying containerized MSW from the PHIMF is low, accidents involving rail cars could occur. The containerized MSW would be shipped in fully contained, enclosed, and sealed containers. Although the containers would each include an air vent to facilitate the discharge of solid waste at the MRL, the vent would be closed while at the PHIMF and during rail transit. Minor accidents, such as one- or two-car derailments with no overturning, would not cause the shipping containers to rupture or result in any exposure of containerized MSW residue to the environment. Major derailments, which could cause a container to break open, have a low probability of occurring on the rail-haul route, but could potentially occur within the 100-year operating life of the landfill.

In general, spillage of containerized MSW residue would not be expected to create any significant environmental health or public safety threats, because containerized MSW is not a hazardous material nor is it expected to contain significant quantities of hazardous materials. The materials spilled would be generally dry, nonhazardous solids without the potential to create noxious or toxic gases or release hazardous constituents that could enter surface or groundwaters (BLM 1995). It is anticipated that containerized MSW debris and residue spills, if any, would stay confined to the immediate track area within the right-of-way. Some blowing of the trash could occur on windy days, which could occasionally cause impacts outside the right-of-way. This blowing trash would be picked up by cleanup crews in accordance with UPRR policy to leave the area just as it was prior to any accident. UPRR cleanup crews are on call 24 hours/day, seven days/week and typically respond to accidents within one hour.

Because containerized MSW residue is not hazardous, California Public Utilities Commission (PUC) regulations would not require UPRR to have specialized emergency response procedures for spilled residue. For nonhazardous materials, cleanup operations would be coordinated by the UPRR district dispatcher based on the needs of the situation. Local emergency response personnel (police, hospitals, etc.) would be called, as appropriate, and the cleanup would be accomplished as quickly as possible by railroad crews, assisted by local contractors when necessary. The appropriate county emergency response office would be called any time a substantial accident or derailment occurred within its jurisdiction. Response activities vary depending upon site-specific conditions. The standard activities for any derailment accompanied by a spill are to contain and remove the spilled material as quickly as possible by (1) use of temporary fencing to prevent access to a derailment area by the public and certain wildlife, and to help contain blowing debris; or

(2) use of netting to cover loose material that has spilled. To ensure safe, fast, and effective cleanup of containerized MSW residue during a train derailment at the PHIMF or enroute, the LACSD would prepare a spill contingency plan to respond to containerized MSW residue-related aspects of train accidents at the PHIMF or enroute (see Mitigation Measure 5-1 below).

To ensure rail safety, the LACSD is required to abide by the General Code of Operating Rules, endorsed and adopted by the Railroads of the United States of America and the Federal Railroad Administration (FRA) for the safe movement of trains. To comply with these standards, the FRA and the California PUC govern compliance with standards for track safety. Both the FRA and the California PUC have qualified professional track inspectors who periodically inspect all tracks within the state of California. In addition, the FRA has established Track Safety Standards to provide minimum standards of maintenance for tracks based on the maximum operating speed and loading conditions.

The staging tracks between Workman Mill Road and Mission Mill Road would be designated as FRA Class 1, or track that has a maximum operating speed of 10 miles per hour (mph) for freight trains. The arrival/ departure tracks east of Workman Mill Road that are used as deceleration and acceleration tracks on and off the UPRR main line would have a different FRA classification to allow for higher speeds. The final FRA designation of these tracks would be determined by the UPRR upon review of final design of these improvements, and an appropriate maintenance and inspection program conforming to the FRA guidelines would be implemented accordingly. The LACSD would be responsible for periodic rail and facility inspections to assure the track structure is in compliance with the FRA Track Safety Standards. A record of these inspections would be maintained on file for review by the FRA or the California PUC track inspectors who would periodically audit these inspections.

Pursuant to the land use permit for the Mesquite Regional Landfill (MRL), the LACSD is required to prepare a spill contingency plan specific to rail operations. The plan would describe activities and responsible agencies that would respond in the event of a train derailment involving trains traveling to and from the MRL. Among other things, the LACSD would be required to establish a response team and specific protocol to address the cleanup of MSW that was spilled due to a derailment or other unforeseen event during rail transport.

IMPACT 5.5-3: THE PHIMF PROJECT AREA CONTAINS PROPERTIES INCLUDED ON A LIST OF HAZARDOUS MATERIALS SITES. [THRESHOLD H-4]

Impact Analysis: A site reconnaissance and agency file review conducted by TRC revealed the presence of the following RECs associated with the project site:

Underground Diesel Tanks

A 2,000-gallon underground storage tank containing diesel fuel was in operation at the subject property between 1990 and 1996 and subsequently removed and replaced with a 10,000-gallon diesel UST. The LADPW issued a case closure letter for the 2,000-gallon UST in 1997. No further action is needed for this historical REC. However, residual diesel fuel hydrocarbons may be present in soil in the vicinity of the former piping associated with this UST.

A 10,000-gallon UST, piping, and associated day tanks are located at the project site for storage and delivery of diesel fuel for the emergency electrical generators. Although no information was identified to suggest that a release of hydrocarbons has occurred from the existing UST system, the potential exists for incidental releases and/or spillage to have occurred from the system. Soil investigations performed by TRC did not detect the presence of total petroleum hydrocarbons in the diesel range (TPH-D), semi-volatile organic compounds (SVOCs), or VOCs at or above their respective analytical method detection limits in any of the

soil samples collected from four direct-push borings drilled in the vicinity of the UST. Based on this finding, it does not appear that a significant release of diesel fuel from the UST has occurred.

The planned building demolition and site preparation and construction activities would require that the existing UST and associated product piping be removed and closed under LADPW oversight in accordance with applicable regulatory standards and procedures. The UST closure activities would involve the collection of soil samples beneath the existing UST and product piping in order to determine if a release of petroleum hydrocarbons has occurred in this area. Based on the results of the Phase I investigation, no additional investigation or analysis of the existing diesel UST is warranted.

Former Print Shop and Photo Development Area

Significant staining was observed on parts of the vinyl tile covered floors within the former print room and photo development room. Historical activities performed in these areas may have included the use of unspecified solvents and the generation of waste ink and spent liquid solvents. Minor concentrations of petroleum hydrocarbons (toluene, ethylbenzene, and/or total xylenes) were detected in soil vapor samples collected at these two locations. Chlorinated VOCs, such as PCE and TCE, were not detected in samples collected from the soil vapor borings. The concentrations of petroleum hydrocarbons detected in soil vapor samples do not suggest the presence of actionable levels of these compounds. According to TRC, given the relatively low concentrations detected and the limited frequency of detections, no additional investigation or analysis of the former print shop and photo development area is warranted.

Ethylene Glycol Storage Tanks/Former Hazardous Materials Storage Area

During TRC's site reconnaissance, 16 ASTs used for the storage of ethylene glycol for the facility's HVAC system were observed on the southeastern portion of the project site. It could not be determined whether the ASTs still contained ethylene glycol. According to agency files, the cumulative storage capacity of the tanks is approximately 40,000 gallons. Ethylene glycol or other VOCs were not detected at or above their respective analytical method detection limits in any of the soil samples collected from six hand auger borings drilled in the vicinity of the ASTs. Based on this finding, it does not appear that the subsurface in the vicinity of the ethylene glycol storage tanks has been impacted by historical storage in this area of the project site.

A former Hazardous Materials Storage Area is located adjacent to the ethylene glycol ASTs. With the exception of sodium hypochlorite, no information regarding additional materials that may have been stored or contained within this area was found in the regulatory file information reviewed as a component of the Phase I investigation. VOCs or other hazardous constituents were not detected at or above their respective analytical method detection limits in any of the soil samples collected from six hand auger borings drilled in the former hazardous materials storage area. Based on this finding, it does not appear that the subsurface in the vicinity has been impacted by historical storage in this area of the project site.

Based on the results of the Phase I investigation, no additional investigation or analysis of the ethylene glycol storage tanks or former hazardous materials storage area is warranted.

Asbestos-Containing Materials and Lead-Based Paint

Based on the construction date of the building (1978), asbestos-containing building materials may be present within the building envelope or associated with building infrastructure (e.g., HVAC systems). The results of an asbestos survey conducted as a component of the Phase I investigation revealed the presence of asbestos-containing materials (ACM) within portions of the roofing system of the building located at 2500 and 2520 Pellissier. The presence of asbestos was confirmed in black roofing tar and roofing materials.

Based on the estimate of the quantity of material, the entire roofing system may contain asbestos. In general, the building materials determined to contain asbestos were observed to be nonfriable, in good condition, and with a low potential for disturbance. Consequently, the presence of ACM does not require immediate abatement or mitigation. However, abatement of ACM would be required as a prerequisite to demolition of the building.

A lead-based paint (LBP) survey was conducted as part of the Phase I investigation. Results of the survey indicated detectable lead concentrations (> 0.7 mg/cm^2) in 13 out of the 331 readings taken. In the areas where LBP was confirmed, the painted surfaces were observed to be in good condition with no apparent peeling, flaking, or deterioration. Until removed, LBP is typically and effectively managed under an Operations and Maintenance (O&M) program. Because the building associated with the proposed project is vacant and would be demolished as part of the project, an O&M plan is not necessary. However, demolition of the building would require compliance with OSHA Rule 29 CFR Part 1926 for lead paint removal.

San Gabriel Valley Area of Concern

The PHIMF site and off-site improvements are located within the San Gabriel Valley Superfund Site: Area 1, Whittier Narrows OU. The groundwater in this general area has been contaminated with chlorinated solvents. Previous investigation under the Los Angeles RWQCB's WIP have determined that groundwater beneath the Cintas facility at 2829 Workman Mill Road, which is adjacent to the parcel that would be used to construct the off-street access road (Parcel A), has been impacted by chlorinated solvents (specifically PCE). On-site dry-cleaning operations historically conducted at the Cintas facility are a potential source for the PCE contamination.

Files were also reviewed for the following adjoining or nearby properties: 2601 Workman Mill Road, 2845 Workman Mill Road, and 2727 Workman Mill Road; however, these sites have been granted No Further Action status and therefore it is unlikely that the project site has been impacted by releases from these facilities. While the potential impacts from the Cintas facility are not likely to adversely impact the future use of the project site, the potential presence of residual groundwater contamination in this area warrants additional consideration. Potential environmental conditions associated with construction and operation of the PHIMF include the following:

- Residual dry cleaning solvents (e.g., PCE) may be present in soil underlying the Cintas facility at 2829 Workman Mill Road and may extend toward the adjacent Zee Medical property and/or Workman Mill Road. As such, excavated soil generated during the construction of the subgrade off-street access road could contain residual chlorinated solvents at concentrations that warrant specific waste handling and management procedures. In addition, excavated soil containing residual chlorinated solvents may be classified as hazardous waste. Additional waste handling, management, and disposal procedures may be necessary.

- Based on the groundwater monitoring data collected at the Cintas Facility in 1999, the anticipated depth to groundwater in the vicinity of the property site is between 30 and 40 feet below ground surface (bgs). As discussed in Section 5.4.3, the Geotechnical Report prepared by KFM Geoscience determined that construction of the preferred off-street access option (Geotechnical Alternative D) chosen by the LACSD would not encroach below the groundwater table and, consequently, dewatering or groundwater control would not be necessary. However, modifications to the San Jose Creek box culvert would occur in close proximity to groundwater and handling of localized seeps and nuisance water would likely be necessary. If dewatering is later determined to be required during construction of the off-street access road, treatment of groundwater extracted during

dewatering activities would be required if contaminant concentrations exceeded applicable discharge limits (e.g., National Pollutant Discharge Elimination System permit requirements).

- The possibility exists for VOCs emanating from impacted groundwater beneath the PHIMF project site to migrate into occupied buildings, such as the planned administration building, thereby presenting a potential health threat to PHIMF employees. Soil vapor samples collected by TRC at the project site found only low concentrations of petroleum hydrocarbons and no detectable chlorinated solvents. According to TRC, the concentrations of petroleum hydrocarbons detected in soil vapor samples do not suggest the presence of actionable levels of these compounds. Therefore, potential impacts from VOC migration into PHIMF buildings via soil vapor do not present a significant environmental concern.

Adjacent RECs

- ***Shell Service Station, 2600 Pellissier Place:*** Based on distance/direction and the measured concentrations, it is unlikely that the project site has been impacted by a release from the Shell Service Station.

- ***Peck Road Ford Truck Sales, 2450 Kella Avenue:*** Based on the lack of reported violations and the distance/direction from the project site, it appears unlikely that a release from this site would have affected the project site.

- ***Cook Industries, 2425 Kella Avenue:*** Based on distance and the absence of reported groundwater impacts, it appears unlikely that the release from this site would have affected the project site.

- ***Johnson Machinery Co., 2600 South Peck Road:*** Based on distance, type of leaked substance, and the absence of reported groundwater impacts, it is unlikely that a release from this site would have affected the project site.

- ***Small Quantity Generators or Haznet Database Listings:*** No violations were noted by EDR at these sites. Based on type of listing and lack of reported violations or releases, it is unlikely that releases from these sites would have affected the project site.

- ***Puente Hills Landfill:*** Five groundwater management barriers have been installed along the outlying canyon surrounding the landfill. The nearest groundwater monitoring well to the project site did not detect VOCs or methane. Consequently, the Puente Hills Landfill has not affected groundwater in the vicinity of the project site.

IMPACT 5.5-4: CONSTRUCTION AND OPERATION OF THE PHIMF WOULD NOT AFFECT THE IMPLEMENTATION OF THE COUNTY OF LOS ANGELES' OR CITY OF INDUSTRY'S EMERGENCY OPERATIONS PLAN. [THRESHOLD H-7]

Impact Analysis: The County of Los Angeles has developed a Multi Hazard Functional Plan for coordination between emergency services during an emergency event. The Los Angeles County DPSS is the agency responsible for disaster preparedness and planning within the county. The DPSS coordinates planning efforts with other agencies, including county support departments, the County Office of Education, the Los Angeles Chapter of the Red Cross, ENLA, the Grocery Industry Mutual Aid Council, and other agencies (DPSS 2003). The project would not interfere with any of the daily operations of these agencies during an emergency event. Furthermore, the project would provide off-street access to the project site for transport of the rail containers carrying containerized MSW by trucks from the PHMRF and other MRFs or transfer

stations to the PHIMF, which would reduce the number of trucks carrying containerized MSW accessing the project site on local roadways. Consequently, no significant impact to the county's Multi-Hazard Functional Plan or emergency service response would occur.

5.5.4 Cumulative Impacts

There are a number of businesses surrounding the proposed project site that store and handle hazardous substances. However, the use of hazardous materials is controlled and permitted by the LACFD, Health Hazardous Materials Division. The LACFD is a state-recognized CUPA, whose responsibilities include but are not limited to inspecting hazardous material handlers and hazardous waste generators to ensure compliance with laws and regulations; implementing CUPA programs for the development of accident prevention and emergency plans, proper installation, monitoring, and closure of underground tanks, and the handling, storage, transportation, and disposal of hazardous wastes; providing 24-hour response to emergency incidents involving hazardous materials or wastes; and conducting investigations and taking enforcement action as necessary against anyone who disposes of hazardous waste illegally or otherwise manages hazardous materials or wastes in violation of federal, state, or local laws and regulations. The hazardous control and safety programs and available emergency response resources of the LACFD, along with periodic inspections to ensure regulatory compliance, reduce the potential risk of upset and exposure to hazardous materials associated with nearby commercial and industrial businesses. No adverse cumulative impacts related to hazardous substances or the creation of any health hazards are anticipated as a result of this project.

5.5.5 Existing Regulations and Standard Conditions

- Comprehensive Environmental Response, Compensation and Liability Act
- Emergency Planning and Community Right-To-Know Act
- Resource Conservation and Recovery Act
- Hazardous Materials Release Notification
- California Accidental Release Prevention Program
- Leaking Underground Fuel Tanks
- Title 23 § 2533 of CCR requires screening procedures to reduce the presence of hazardous waste materials (noncontainerized MSW) in waste stream at MRFs and the PHIMF.
- South Coast Air Quality Management District (SCAQMD) Rule 1403, in whole or in part, is applicable to owners and operators of any demolition or renovation activity, and the associated disturbance of ACM, any asbestos storage facility, or any active waste disposal site. The SCAQMD rule specifies work practice requirements to limit asbestos emissions from 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, disposal, and landfilling requirements for asbestos-containing waste materials (ACWM). All operators are required to maintain records, including waste shipment records, and are required to use appropriate warning labels, signs, and markings.

- OSHA Rule 29 CFR Part 1926, establishes standards for occupational health and environmental controls for lead exposure. The standard also includes requirements addressing exposure assessment, methods of compliance, respiratory protection, protective clothing and equipment, hygiene facilities and practices, medical surveillance, medical removal protection, employee information and training, signs, recordkeeping, and observation of monitoring.

5.5.6 Project Design Features

PDF-5-1 The Puente Hills Intermodal Facility will not accept containers of municipal solid waste that have not been processed at transfer stations and material recovery facilities.

PDF 5-2 The Puente Hills Intermodal Facility will accept only containerized Class III municipal solid waste (MSW), as defined in California Code of Regulations, Titles 14 and 23. All employees at the Mesquite Regional Landfill with access to containerized MSW residue will be trained to identify suspicious materials. A safe location for temporarily storing hazardous material removed from containerized MSW residue will be provided at the site.

PDF-5-3 All containers accepted at the Puente Hills Intermodal Facility will be leakproof and will include a vent at one end to allow air to enter during tipping to facilitate container unloading. This vent will be closed during transit to the Mesquite Regional Landfill so that substantial amounts of air cannot flow through the containers.

PDF-5-4 Areas at the Puente Hills Intermodal Facility designated for the storage of hazardous materials will incorporate secondary containment features, such as spill containment pallets, to contain and properly manage any spilled fluids.

5.5.7 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and standard conditions of approval, the following impacts would be less than significant: 5.5-1 and 5.5-4.

Without mitigation, the following impacts would be **potentially significant**:

- Impact 5.5-2 Operation of the PHIMF could potentially result in a train derailment causing the release of municipal solid waste.

- Impact 5.5-3 The PHIMF project area contains properties included on a list of hazardous materials sites.

5.5.8 Mitigation Measures

Impact 5.5-2

5-1 County Sanitation District No. 2 of Los Angeles County shall prepare a containerized municipal solid waste (MSW) residue spill contingency plan to respond to containerized MSW residue-related aspects of train accidents at the Puente Hills Intermodal Facility or en route to the Mesquite Regional Landfill. Standard measures incorporated as part of the spill contingency plan shall include (1) use of temporary fencing to contain blowing debris and prevent access to a derailment area by the public and certain wildlife; or (2) use of netting to cover loose material that has spilled.

Impact 5.5-3

5-2 Prior to issuance of grading permits and commencement of construction-related excavation or grading, the developer shall have developed and be prepared to implement a Contamination Contingency Plan, the provisions of which shall include criteria for construction work stoppage due to contamination, related procedures for work zone personnel monitoring, sampling, and waste analysis methods and protocols; required agency notifications (as necessary); and provisions for upgraded construction worker personal protective equipment and/or use of specially trained field personnel.

5-3 County Sanitation District No. 2 of Los Angeles County (LACSD) shall conduct soil sampling in the vicinity of the Cintas facility at 2829 Workman Mill Road under oversight of a professionally certified and/or licensed environmental consultant. The following environmental assessment activities shall be performed:

1) Drill at least six soil borings at 50-foot intervals along the centerline of the proposed off-street access road beneath Workman Mill Road and the Union Pacific Railroad right-of-way. The total depths of the soil borings will vary depending on construction requirements and location. At a minimum, the borings shall extend to at least five feet below the anticipated final grade of the subgrade access way (i.e., to depths ranging from 33 to 53 feet below ground surface).

2) Collect soil samples at five-foot intervals in each boring for field description, vapor screening, and/or laboratory analysis of volatile organic compounds via Environmental Protection Agency Method 8260B.

3) Prepare a summary report detailing the sample collection methodology, findings, and conclusions.

The LACSD shall implement all recommendations provided within the summary report detailing collection, treatment, and/or disposal of potential hazardous materials excavated on-site.

5-4 If dewatering is determined to be necessary for construction of the off-street access road and/or modification of the Industry Private Drain No. 161, Line A, County Sanitation District No. 2 of Los Angeles County shall conduct groundwater sampling in conjunction with the soil sampling described in Mitigation Measure 5-3. The groundwater sampling and analysis shall consist of the following elements: (1) collect groundwater samples from the six soil borings using Hydropunch or Simulprobe techniques; (2) analyze groundwater samples for volatile organic compounds via EPA Method 8260B; and (3) conduct additional laboratory analyses, as may be required to characterize groundwater quality for the purpose of obtaining a National Pollutant Discharge Elimination System permit for the discharge of groundwater generated during dewatering.

5-5 Remaining ethylene glycol liquid stored in aboveground storage tanks at the project site, along with the tanks, related piping, and infrastructure, shall be removed by a qualified contractor experienced in hazardous material handling, decontamination, and disposal procedures.

5-6 The 10,000-gallon diesel underground storage tank shall be closed by removal under oversight of the Los Angeles County Department of Public Works (LADPW). After removal of the tank and associated piping, confirmation soil sampling shall be conducted to determine whether there

has been a significant release. Any detected petroleum hydrocarbons shall be remediated to the satisfaction of the LADPW such that a No Further Action letter can be issued for the site.

5.5.9 Level of Significance After Mitigation

The Mitigation Measures identified above would reduce potential impacts associated with hazards and hazardous materials to less than significant. Therefore, no significant unavoidable adverse impacts relating to hazards have been identified.

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