

4.6. Hazards and Hazardous Materials

This section discusses potential impacts from fire hazards and hazardous materials associated with the proposed Project and possible mitigation measures. Public health and water quality concerns associated with the conveyance and treatment of sewage and the use of recycled water are addressed in the Hydrology and Water Quality section. Municipal sewage, wastewater, and biosolids (sludge) are all excluded from the U.S. Environmental Protection Agency (USEPA) definition of hazardous waste/hazardous materials.

The Project would be constructed in three phases and has four main elements that could result in impacts related to hazards and hazardous materials: 1) wastewater treatment facility; 2) pump stations; 3) collection and distribution system pipelines; and 4) percolation ponds and groundwater injection wells. For the purposes of this section, "Project area" refers to the area that encompasses the extent of the four main elements described above and the area that would be served by these proposed Project facilities, and "Project site" refers specifically to those areas that would be disturbed by construction activities associated with these four main elements. The Project would include a Local Coastal Program Amendment and modification of zoning for the wastewater treatment facility to include an Institutional District Overlay.

4.6.1. Environmental Setting

Hazardous substances are defined in the federal Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), Section 101(14) and in California Code of Regulations (CCR) Title 22, Chapter 11, Article 2, Section 66261 as follows:

A hazardous material is a substance or combination of substances that, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may either 1) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness or 2) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed.

The handling and storage of hazardous materials at the site are subject to federal, state, and county regulations. The storage of hazardous materials in underground storage tanks is regulated by the State Water Resources Control Board (State Water Board), which has delegated authority to the regional water quality control board (RWQCB) and the Los Angeles County Fire Department (LACFD). In addition, LACFD inspectors monitor the storage of hazardous materials for compliance with local requirements. For this analysis, soil containing hazardous materials that is excavated from a site would be considered a hazardous waste if it exceeded specific CCR Title 22 criteria. Remediation (cleanup and safe removal/disposal) of hazardous wastes found at a site is required if excavation of such materials is performed. Even if soil or groundwater at a contaminated site does not have the characteristics required to be defined as hazardous waste, remediation of the site may be required by regulatory agencies subject to jurisdictional authority. Cleanup requirements are determined on a case-by-case basis by the agency taking lead jurisdiction.

Regulatory Setting

Federal Regulations

The federal Toxic Substances Control Act (1976) and the Resource Conservation and Recovery Act of 1976 (RCRA) established a program administered by USEPA for the regulation of the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA was amended in 1984 by the Hazardous and Solid Waste Act (HSWA), which affirmed and extended the “cradle to grave” system of regulating hazardous wastes. The use of certain techniques for the disposal of some hazardous wastes was specifically prohibited by HSWA. CERCLA was amended by the Superfund Amendments and Reauthorization Act (SARA) on October 17, 1986.

CERCLA, commonly known as the Superfund, was enacted by Congress on December 11, 1980. This law provided broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA established requirements concerning closed and abandoned hazardous waste sites, provided for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified. CERCLA also enabled revision of the National Contingency Plan (NCP). The NCP provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The NCP also established the National Priorities List (NPL).

Hazardous and toxic substances are defined by the Occupational Safety and Health Administration (OSHA) as those chemicals present in the workplace that are capable of causing harm. In this definition, the term chemicals include dusts, mixtures, and common materials such as paints, fuels, and solvents. OSHA currently regulates exposure to approximately 400 substances. Under OSHA regulations, an employer is required to monitor worker exposure to listed hazardous substances and notify workers of exposure (29 CFR, Section 1910). The regulations specify requirements for employee training, availability of safety equipment, accident-prevention programs, and hazardous substance exposure warnings.

State Regulations

Hazardous Materials and Waste

The California Hazardous Waste Control Law (HWCL) is administered by the California Environmental Protection Agency (Cal-EPA) to regulate hazardous wastes. The HWCL lists 791 chemicals and about 300 common materials that may be hazardous; establishes criteria for identifying, packaging, and labeling hazardous wastes; prescribes management controls; establishes permit requirements for treatment, storage, disposal, and transportation of hazardous wastes; and identifies some wastes that cannot be disposed of in landfills.

Title 22 (Chapter 11, Article 3, CCR) considers substances having characteristics of toxicity, ignitability, corrosivity, or reactivity exceeding specified thresholds to be hazardous. Hazardous wastes are hazardous substances that no longer have a practical use, such as material that has been abandoned, discarded, spilled, contaminated, or is being stored prior to proper disposal. Hazardous materials have certain chemical, physical, or infectious properties that cause them to be considered hazardous.

Toxic substances may cause short-term or long-lasting health effects, ranging from temporary effects to permanent disability or death. For example, toxic substances can cause eye or skin irritation, disorientation, headache, nausea, allergic reactions, acute poisoning, chronic illness, or other adverse health effects if human exposure exceeds certain levels (the level depends on the substance involved). Carcinogens (substances known to cause cancer) are special classes of toxic substances.

Examples of toxic substances include most heavy metals, pesticides, and benzene (a carcinogenic component of gasoline). Ignitable substances such as gasoline, hexane, and natural gas are hazardous because of their flammable properties. Corrosive substances are chemically active and can damage other materials or cause severe burns upon contact; examples include strong acids and bases such as sulfuric (battery) acid or lye. Reactive substances may cause explosions or generate gases or fumes. Explosives, pressurized canisters, and pure sodium metal (which reacts violently with water) are examples of reactive materials.

Other types of hazardous materials include radioactive and biohazardous substances [\(such as laboratory cultures of potentially infectious diseases\)](#). Radioactive materials and wastes contain radioisotopes, which are atoms with unstable nuclei that emit ionizing radiation to increase their stability. Radioactive waste mixed with chemical hazardous waste is referred to as “mixed waste.” Biohazardous materials and wastes include anything derived from living organisms. They may be contaminated with disease-causing agents, such as bacteria or viruses.

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

Senate Bill 1082 (1993) established the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program). The Unified Program consolidates, coordinates, and makes consistent the following hazardous materials and hazardous waste program elements:

- Hazardous waste generation, including on-site treatment under Tiered Permitting;
- Aboveground Petroleum Storage Tank (APST) Spill Prevention, Control, and Countermeasure Planning (SPCCP);
- Underground Storage Tanks (USTs);
- Hazardous Material Release Response Plans and Inventories;
- California Accidental Release Prevention Program (CalARP); and
- Uniform Fire Code Hazardous Materials Management Plans and Inventories.

A Certified Unified Program Agency (CUPA) is a county, city, or joint powers agency that is approved and designated by Cal-EPA to implement the Unified Program and responsible for all six program elements of the Unified Program within its jurisdiction. LACFD is the CUPA for the City.

Hazardous Material Worker Safety

The California Occupational Safety and Health Administration (Cal/OSHA) is the primary agency responsible for worker safety in the handling and use of chemicals in the workplace. Cal/OSHA standards are generally more stringent than federal regulations (as described by the federal OSHA program). An employer is required to monitor worker exposure to listed hazardous substances and notify workers of exposure (8 CCR, Sections 337–340). The regulations specify requirements for

employee training, availability of safety equipment, accident-prevention programs, and hazardous substance exposure warnings.

Local Regulations

Los Angeles County Underground Storage Tank (UST) Program

The UST Program of the Los Angeles County Department of Public Works (DPW), Environmental Programs Division, permits and inspects underground storage tanks within the unincorporated areas of Los Angeles County and 77 cities. The unit regulates all unauthorized releases from underground storage tanks.

Los Angeles County Code (LACC), Title 11, Division 4, established the UST program in Los Angeles County in 1983. The program's goal is to protect the public, the environment (air, soil, and groundwater), and UST owners/operators by ensuring that UST facilities are permitted; designed, installed, modified; operated; and eventually closed in compliance with local, state, and federal requirements (Los Angeles County DPW 2013).

Malibu Hazardous Waste Roundup Program

The Malibu Hazardous Waste Roundup Program (HWRP) is available to City residents on the third Saturday of each month from 10:00 a.m. to 2:00 p.m. at the Malibu Library. The HWRP accepts used oil, oil filters, antifreeze, car batteries, and water-based latex paint (City of Malibu 2013). The HWRP is sponsored jointly by the Sanitation Districts of Los Angeles County and the DPW. The Household Hazardous Waste (HHW) collection program gives Los Angeles County residents a legal and cost-free way to dispose of unwanted household chemicals that cannot be disposed of in the regular trash.

Malibu General Plan

The City's General Plan was adopted in 1996 (City of Malibu 1996a) and last revised in 2014 with the adoption of the Housing Element Update. The City's General Plan is primarily a policy document that sets goals and policies concerning the community and gives direction to growth and development. In addition, it outlines the programs that were developed to accomplish the goals and policies of the General Plan.

Safety Element

California Code Section 65302(1) requires each local government to prepare and adopt a Safety Element as a component of its general plan. This involves identifying and mapping natural hazards and the administration of zoning and subdivision regulations that account for the safety hazards. The purpose of the Safety Element is to create a cohesive guide consisting of specific policy-oriented implementation measures.

The policies and implementation measures contained in this element provide direction and a course of possible future action for the various City departments. Below is a list of goals, objectives, and policies related to hazards and hazardous materials in the City.

Safety (S) Goal 1: A community that is free from all avoidable risks to safety, health, and welfare from natural and man-made hazards.

- **S Policy 1.1.1:** The City shall protect people and property from environmental hazards.

- **S Policy 1.1.2:** The City shall minimize the risk of loss from fire.
- **S Policy 1.1.3:** The City shall reduce the amount of non-essential toxic and hazardous substances.
- **S Policy 1.1.4:** The City shall promote use of alternatives to hazardous substances.
- **S Implementation Measure 10:** Require all new and remodel structures to have Class A fire-retardant roofing.

As explained in the Safety Element (pg. 5-34), other preventive measures required by City and/or County ordinances to reduce risk factors associated with wildfires are:

- The elimination of wood shake roofs for new construction;
- The establishment of greenbelt systems in new subdivisions;
- Improvements to existing water systems and vehicular access routes in a number of areas;
- Improvements to the Incident Command System used by LACFD and emergency communication and coordination among the various fire resource agencies;
- Installation of smoke detectors in homes and sprinkler systems in commercial buildings; and
- An aggressive brush clearance program.

Local Coastal Program

The City lies entirely within with the California Coastal Zone as defined by the California Coastal Act. The Coastal Act requires that its goals and policies be implemented by local government through the LCP process. The LCP is composed of two parts: the Land Use Plan (LUP) and the Local Implementation Plan (LIP); both were certified by the California Coastal Commission on September 13, 2002.

Land Use Plan (LUP)

The LUP does not have policies related to hazardous materials and disease vectors; however, it does have policies related to wildfires.

Policy 4.1 The City of Malibu and the Santa Monica Mountains Coastal Zone contain areas subject to hazards that present substantial risks to life and property. These areas require additional development controls to minimize risks and include, but shall not be limited to, the following: Fire Hazard: areas subject to major wildfires classified in Fire Zone 4 or in the Very High Fire Hazard Severity Zone.

Policy 4.3 Information should be provided to the public concerning hazards and appropriate means of minimizing the harmful effects of natural disasters upon persons and property relative to siting, design, and construction.

Policy 4.13 Land divisions, including lot line adjustments, shall be prohibited unless all proposed parcels and access roads are found to comply with all applicable fire safety regulations and all required approvals are obtained.

Policy 4.14 New development shall be prohibited on property or in areas where such development would present an extraordinary risk to life and property due to an existing or demonstrated potential public health and safety hazard.

Policy 4.45 New development shall minimize risks to life and property from fire hazard through:

- Assessing site-specific characteristics such as topography, slope, vegetation type, wind patterns, etc.;
- Siting and designing development to avoid hazardous locations;
- Incorporating fuel modification and brush clearance techniques in accordance with applicable fire safety requirements and carried out in a manner that reduces impacts on environmentally sensitive habitat to the maximum feasible extent;
- Use of appropriate building materials and design features to ensure the minimum amount of required fuel modification; and
- Use of fire-retardant native plant species in landscaping.

Policy 4.46 New development within Environmentally Sensitive Habitat Areas (ESHAs) and habitat buffers shall be sized, sited, and designed to minimize the impacts of fuel modification and brush clearance activities on habitat and neighboring property.

Policy 4.47 Development adjacent to parkland shall be sited and designed to allow all required fire-preventive brush clearance to be located outside park boundaries, unless no alternative, feasible building site exists on the project site. A natural vegetation buffer of sufficient size should be maintained between the necessary fuel modification area and the public parkland, where feasible.

Policy 4.48 When brush clearance is required for fire safety, brushing techniques that minimize impacts on native vegetation and ESHAs and minimize erosion, runoff, and sedimentation shall be utilized.

Policy 4.49 Applications for new development that require fuel modification shall include a fuel modification plan for the project prepared by a landscape architect or resource specialist that incorporates measures to minimize removal of native vegetation and minimizes impacts on ESHAs while providing fire safety consistent with the requirements of applicable fire safety regulations. Such plans shall be reviewed and approved by the Forestry Division.

Policy 4.50 New development shall provide for emergency vehicle access and fire-flow water supply in accordance with applicable fire safety regulations.

Policy 4.51 All new development shall demonstrate the availability of an adequate water supply for fire protection, as required by applicable fire safety regulations.

Policy 4.52 Where applicable, property owners shall comply with applicable fire safety regulations for management of combustible vegetative materials (controlled burns) in fire hazardous areas.

Policy 4.53 The City shall coordinate with county, state and national park agencies to develop a closure policy for public recreation areas during periods of extreme fire hazard.

Policy 4.54 Should LACFD policies regarding fuel management and fire protection conflict with the policies and provisions of the Malibu LCP, particularly those relating to the protection of ESHAs, personnel from LACFD and the City shall meet and agree on measures to balance the need for fire protection for structures with the need to protect environmental resources.

Local Implementation Plan (LIP)

The LIP contains implementation measures regarding development in fire hazard areas. These measures are pertinent to the proposed Project in the context of hazards from wildfires. LIP Chapter 3, Zoning Designations and Permitted Uses, provides permitted uses, development standards, lot development criteria, and development standards for various uses. The goal of these standards is to minimize fire risks and ensure adequate firefighting provisions and emergency vehicle access for the development. LIP Chapter 9, Hazards, provides development standards, permit and application requirements, and other measures to ensure that permitted new development shall minimize risks to life and property by fire hazards. The LIP does not contain measures and regulations regarding hazardous materials and disease vectors.

Existing Conditions

The Project area is located in the central portion of the City of Malibu (“City”), in the downtown/ Civic Center area, generally east of Malibu Canyon and west of Malibu Creek, including a portion of unincorporated Los Angeles County north of the city limits. The Project area includes areas where pipelines would be located (see Chapter 2, Project Description, for more information). Most of the Project area is flat, but it also includes some hills that slope down toward the Pacific Ocean. In addition, portions of the pipelines in Phases 2 and 3 would cross fairly steep terrain. The proposed wastewater treatment facility site is located on a 3-acre parcel on the south side of Civic Center Way.

Wildfire

Wildland fires are inevitable and are part of the natural regeneration cycle of the native California landscape. Native vegetation, such as highly flammable chaparral vegetation, covers thousands of acres in brushlands throughout the Santa Monica Mountains. Therefore, fires in these brushlands are inevitable because of the flammability of both living and nonliving brush as well as the occurrence of variable weather conditions. Fires are a threat to many of the residences within the City because homes have been developed within heavily vegetated canyons that are surrounded by underbrush.

The LACFD and the State Division of Forestry give the City and the Project site the highest fire hazard ratings (Fire Zone 4 and Class II). The City’s General Plan and Local Coastal Program also include policies related to wildfires (see discussion above).

The combination of Southern California’s Mediterranean climate—with its winter and spring rainfall and hot, dry summers—and the frequency of high wind velocity creates optimal conditions for wildfires. The annual rainfall pattern supports grasses, shrubs, and trees, and the hot arid summers result in dry vegetation. This readily combustible material can be easily ignited and will burn hot and fast, especially during high wind conditions. Southern California fires that have consumed more than 90 percent of the wildfire-burned acreage were accompanied by high-velocity winds (California Department of Forestry and Fire Protection 2007).

Over the past 30 years, the City has experienced several major brush fires. Most fires occurring within the City occur during fall and winter months (September to March) due to dry conditions and the occurrence of Santa Ana winds (warm dry down-slope winds that originate inland and produce critical fire conditions). To reduce the risk of fire to homeowners and businesses, selective clearance of flammable vegetation is required for all structures. Los Angeles County Fire Code requires the removal of flammable vegetation, including weeds and dead trees, within 100 feet of buildings. Trees that are 18 feet or more in height within 100 feet of structures must have branches and foliage removed within 6 feet of the ground.

About 99 percent of all fires occurring within Malibu are caused by human activity, with 1 percent caused by natural occurrences. Although preventive measures have been taken, fire risks within the City remain significant.

In 2007 alone, three fires occurred in the area: the Malibu Canyon Fire, the Corral Fire, and the Malibu Bluffs Fire. The October 2007 Malibu Canyon fire swept through the proposed Project site. In the November 2007 Corral Fire, 86 buildings, 37 vehicles and one mobile home were destroyed. Eight firefighters suffered injuries (MalibuComplete.com 2007).

The general area surrounding the proposed Project is known for high-velocity wind conditions. Such winds are due mostly to the area's topography. The area is also subject to occasional Santa Ana-like conditions.

Public Airports and Private Airstrips

There are no public airports or private airstrips in the Project area. However, two private heliports are located in the Project area, one at Hughes Research Laboratory (3011 Malibu Canyon Road) and one at the Los Angeles County Malibu Administrative Center (23519 Civic Center Way).

Schools

Schools are considered sensitive receptors for potential releases of hazardous materials. There are four schools within ¼ mile of Project pipelines, two of which are also located within ¼ mile of the wastewater treatment plant site:

- Our Lady of Malibu Catholic School, 3625 Winter Canyon Road, serves kindergarten through 8th grade;
- Webster Elementary School, 3602 Winter Canyon Road, serves grades kindergarten through 5th grade;
- Malibu Presbyterian Church, 3324 Malibu Canyon Road, is the site of a preschool; and
- Pepperdine University, 24255 Pacific Coast Highway.

Hazardous Waste/Materials

Historic Land Use

A Phase I Environmental Site Assessment was prepared by SCS Engineers (2013), and identified historic land uses that might result in residual contamination at the Project facility sites. The wastewater treatment plant site is already occupied by an existing wastewater treatment plant, which has four above-ground storage tanks, two of which are used for chemical storage. Prior to construction of the existing facilities on the site, the property was either vacant or in agricultural use as an orchard. Most of the pump station sites were parts of existing roadways, with residential uses surrounding the sites. The Bluffs Park pump station site was either undeveloped or in agricultural use until it was developed as a park around 1960. The pump station site in Legacy Park is adjacent to two former gas stations and one existing gas station. The injection well area along Malibu Road was formerly a portion of PCH. There was a gas station along the road from about 1938 to 1957, and there are currently two dry cleaning facilities on Malibu Road. ~~The injection well site in Legacy Park is adjacent to two former gas stations and one existing gas station.~~

Pipeline routes would be located along existing roadways and would be adjacent to the gas station facilities mentioned above. Proposed pipelines would also be located adjacent to two existing dry cleaners and one former dry cleaning facility.

Database Review

A database search for sites listed on various federal, state, tribal, and local databases in the Project area was obtained from Environmental Data Resources (EDR) in November 2013, and is included in the Phase I Environmental Site Assessment (SCS Engineers, 2013). As described in that report, the EDR database lists the following sites within the Project area where known or suspected releases of hazardous waste have occur:

- HRL Laboratories, 3011 S. Malibu Canyon Rd.
- GTE (Verizon) Malibu Plant Yard, 3705 Cross Creek Rd.
- Cross Creek Yard/Adamson Companies Maintenance/1X Mallen Excavating, 3728 Cross Creek Rd.
- Los Angeles County Department of Public Works Road 336/#436TS, 3637 S. Winter Canyon Rd.
- Santa Monica Malibu USD-Webster Elementary, 3602 Winter Canyon Rd.
- Malibu Shell/Texaco, 23387 Pacific Coast Highway
- Malibu Sheriff's Station/LA Co DPW, 23555 Civic Center Way
- Chevron, 23614 Pacific Coast Highway
- Unocal #6267, 23670 Pacific Coast Highway
- Chevron Station 97213, 23641 Pacific Coast Highway
- Spic & Span, 22941 Pacific Coast Highway
- Spic & Span, 23680 Malibu Rd.
- Landmark Cleaners, 23410 Civic Center Way
- Colony Cleaners, 3872 Cross Creek Rd.
- Ogden Cleaners, 23823 Malibu Rd.
- Historical gas station, 23757 Malibu Rd.

Figure 4.6-1 shows locations of facilities that have environmental conditions that could affect construction of Project facilities.

Figure 4.6-1. Locations of Known or Suspected Releases of Hazardous Waste



4.6.2. Environmental Impact Analysis

Thresholds of Significance

For the purposes of this EIR and in accordance with Appendix G of the State CEQA Guidelines, the proposed Project would result in a significant impact with respect to hazards and/or hazardous materials if it would:

1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
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;
3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
4. 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;
5. Be located within an airport land use plan or within two miles of a public airport or public use airport and result in a safety hazard for people residing or working in the project area;
6. Be located within the vicinity of a private airstrip and result in a safety hazard for people residing or working in the area;
7. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or
8. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

Impacts

As noted in the setting section, there are no public -or private air strips or airports in the Project area; therefore, the proposed Project would not create any airport related hazards. There are two private heliports located near proposed pipeline alignments, but none of the Project elements is expected to cause a safety hazard in regard to helicopter traffic. Additionally, it should be noted that, per the USEPA, municipal sewage, wastewater, and biosolids (sludge) are all excluded from the definition of hazardous waste/hazardous materials. That is not to say that they could not pose a hazard if mishandled; however, Project design and operations have been configured to minimize the potential for wastewater spills, releases or mismanagement.

Impact HM-1: Would the Project Create a Significant Hazard through Routine Transport, ~~and~~ Use and Storage or Accidental Release of Hazardous Materials?

Construction

Construction of the proposed Project would involve the use of materials that are generally regarded as hazardous, such as gasoline, diesel fuel, hydraulic fluids, paint, and other similar materials. The risks to the community, including the two schools located within ¼ mile of the proposed treatment facility site, associated with the routine transport, use, and storage of these materials during construction are anticipated to be relatively small. With appropriate handling and disposal practices, there is relatively little potential for an accidental release of hazardous materials during construction, and the likelihood is small that workers and the public, including nearby schools, would be exposed to health hazards. Storage and handling of materials during construction would employ Best Management Practices (BMPs) and would be subject to provisions of the Project Storm Water Pollution Prevention Plan, which is described in greater detail in Section 4.7, Hydrology and Water Quality. BMPs would include provisions for safely refueling equipment, and spill response and containment procedures. Therefore, the potential impacts due to routine transport, use, or disposal of hazardous materials during construction would be less than significant. Nonetheless, the contractor would be required to implement Mitigation Measures HM-1 and HM-2 to ensure any impacts would remain less than significant.

Construction of the proposed Project could also result in the exposure of construction workers, nearby sensitive receptors (such as students) and residents within a one-quarter mile to potentially contaminated soils due to other historic releases of hazardous materials to soil or groundwater, a potentially significant impact. The Project area includes a number of dry cleaners, gas stations and other facilities (both present and in the past) with underground storage tanks where activities including solvent use and leaking tanks could have residual effects on soil and groundwater. Mitigation Measure HM-3 would ensure appropriate handling of any hazardous soils or groundwater encountered during construction, reducing impacts to a less-than-significant level.

Operation

Operation of pipelines and pump stations would not require storage and regular use of hazardous materials. The proposed wastewater treatment facility, however, would use sodium hypochlorite and alum (aluminum sulfate) as part of the treatment process, both of which are classified hazardous substances. Sodium hypochlorite is the active ingredient in bleach; it is also used to chlorinate pools. Sodium hypochlorite would be stored in 230-gallon totes (square reusable industrial containers, approximately 4 feet on each side, designed for the transport and storage of bulk liquid and granulate substances), and alum would be stored in a tank with a capacity of up to 5,000 gallons. Small amounts of fuels and other similar materials could also be used and stored on site. Access to chemicals would be controlled to ensure safety, and appropriate secondary containment for treatment chemicals would be provided as required by the Los Angeles County Fire Department. Accordingly, reasonably foreseeable upset and accident conditions are not expected to result in a significant hazard to the public (including the two schools within ¼ mile of the treatment facility site) or the environment. However, to ensure the potential hazards would remain less than significant and operation of the facility would not subject the public (including sensitive receptors such as the nearby schools) to undue risks due to exposure of hazardous materials, Mitigation Measure HM-4, which would require preparation and implementation of a Hazardous Materials

Business Plan, would be implemented. This measure would ensure proper handling and storage of hazardous materials at the proposed wastewater treatment facility.

The treatment process would also use sodium bicarbonate, citric acid and a carbon compound called MicroC™, but these materials are not considered to be hazardous substances (California Occupational Safety and Health Regulations (CAL/OSHA) Chapter 3.2, Subchapter 1. Regulations of the Director of Industrial Relations, Article 5. Hazardous Substances Information and Training, Section 339). These chemicals are standard for use in modern wastewater treatment and will be handled by experienced plant operations staff. Mishandling by unauthorized persons is not expected given that the treatment plant site will be fenced, with access gates operable only by plant staff. Furthermore, the storage of these chemicals will be in closed containers within areas that are further secured by fence and building enclosures.

Impact HM-2: Would the Project Expose People or Structures to a Significant Risk of Loss, Injury, or Death due to Hazards from Wildland Fires?

The City is located within Fire Zone 4. All Project construction and operation of the proposed wastewater treatment system would be in compliance with the goals, policies, and implementation measures of the City's General Plan Safety Element; LCP; LACFD; Department of Public Works, Building and Safety Division; Fire Zone 4; and Very High Fire Hazard Severity Zone requirements. Examples of protective building construction measures include Fuel Modification Zones (areas with drought-tolerant, low-fuel-volume plants); 26 foot-wide LACFD-compliant access driveway development with specific building materials, such as fire-retardant roofing; and the installation of sprinkler systems. The proposed Project would comply with all applicable measures and regulations and be designed to ensure public safety, even in the event of a fire. Furthermore, even if a fire were to affect the Project site, it would not be expected to cause a sewage spill as the pipelines that move the wastewater to and around the plant site are located below grade. Therefore, no additional mitigation measures are proposed. Impacts would be less than significant and no mitigation is necessary.

Impact HM-3: Would the Project Interfere with an Emergency Response Plan?

During construction, installation of pipelines along roadways could block access to nearby roadways for emergency vehicles. As part of the proposed Project (see Chapter 3, Section 3.4.3 of this EIR), a Traffic Control Plan, which would contain strategies for maintaining emergency access during construction, would be developed. Specifically, police, fire, and other emergency service providers, as well as facility owners and administrators of surrounding sensitive land uses, would be notified of the timing, location, and duration of the construction activities and the location of detours and lane closures. Implementation of the Traffic Control Plan would ensure that potential emergency vehicle access impacts during construction would be minimized and would be less than significant. Once construction is completed, operation of the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, the impacts of the proposed Project on emergency response plans and emergency vehicle access would be less than significant.

4.6.3. Mitigation Measures

The following measures are proposed to mitigate Impact HM-1 described above.

MM HM-1: An environmental training program shall be established to communicate environmental concerns and appropriate work practices, including spill prevention, emergency response measures, and proper best management practices implementation, to all field personnel [associated with construction activities](#). The training program shall emphasize site-specific physical conditions to improve hazard prevention (e.g., identification of potentially hazardous substances) and shall include a review of all site-specific plans.

A Hazardous Substance Control and Emergency Response Plan shall be prepared by the contractor. This plan shall be submitted to the City along with the grading permit application for each structure or with the encroachment permit application for the construction of pipelines. The plan shall prescribe hazardous-materials handling procedures for reducing the potential for a spill during construction and shall include an emergency response program to ensure quick and safe cleanup of accidental spills. Furthermore, the plan shall identify areas where refueling and vehicle maintenance activities and storage of hazardous materials, if any, shall be permitted. These directions and requirements shall also be reiterated in the Project's Storm Water Pollution Prevention Plan (SWPPP).

MM HM-2: Oil-absorbent material, tarps, and storage drums shall be used to contain and control any minor releases in construction areas. Emergency spill supplies and equipment shall be kept adjacent to all areas of work and in staging areas, and shall be clearly marked. Detailed information for responding to accidental spills and for handling any resulting hazardous materials shall be provided in the Project's Hazardous Substances Control and Emergency Response Plan.

MM HM-3: During excavation and grading for the proposed Project, the contractor shall observe exposed soil for visual evidence of contamination. If visual contamination indicators are observed during excavation or grading activities, all work shall stop and an investigation shall be designed and performed to verify the presence and extent of contamination at the site. A qualified and approved environmental consultant shall perform the review and investigation. Results shall be reviewed and approved by LACFD or the California Department of Toxic Substances Control (DTSC) prior to construction. The investigation shall include collecting samples for laboratory analysis and quantifying contaminant levels within the proposed excavation and surface disturbance areas. Subsurface investigation shall determine appropriate worker protection and hazardous material handling and disposal procedures appropriate for the subject site.

MM HM-4: [For Project operations](#), the City shall prepare a Hazardous Materials Business Plan for the wastewater treatment facility that would address handling and storage of all hazardous chemicals that would be used during the treatment process. The plan shall address containment, site layouts, and emergency response and notification procedures for a spill or release.

4.6.4. Unavoidable Significant Adverse Impacts

There would be no significant unavoidable adverse impacts associated with hazards or hazardous materials.

4.6.5. Cumulative Impacts

The geographic scope of potential cumulative impacts related to hazards and hazardous materials encompasses the Project site and immediate vicinity. Other projects in the general vicinity include a

variety of residential, commercial and public facilities projects, all of which would use similar materials, such as fuels, during construction. With implementation of standard BMPs, construction of the Project and other projects is not expected to result in cumulatively significant exposure to hazardous materials. In addition, the Project includes mitigation to ensure appropriate handling of hazardous materials as well as any soil or water that may be encountered during construction that has become contaminated with hazardous waste. Other projects would also be required to meet state and federal requirements for the handling of hazardous materials and ensure appropriate handling of any hazardous waste as well as contaminated soil or water encountered during construction. In addition, other projects would not be expected to use substantial quantities of hazardous materials during operation, other than small quantities of typical household hazardous materials (e.g. cleaners, paints, fuel for gardening equipment). The cumulative impacts are therefore expected to be less than significant.