

4.8 HAZARDS AND HAZARDOUS MATERIALS

INTRODUCTION

This section of the Draft EIR evaluates potential environmental impacts on human health and the environment due to exposure to hazards and hazardous materials present or potentially present on the Project Site. This section also evaluates the potential effects on the surrounding area as a result of the implementation of the proposed Project. For the purpose of this analysis, the terms “hazards” and “hazardous materials” include substances that, because of their quantity, concentration, or characteristics, may present moderate danger to public health, welfare, or the environment upon being released.

Information used to prepare this section was taken from the following sources, which are incorporated by reference herein and included in **Appendix L** to this Draft EIR.

For the Compton High School (CHS) site:

- Converse Consultants, *Phase I Environmental Site Assessment Report: Compton High School 601 S. Acacia Avenue, Compton, California (Assessor’s Identification Numbers [AINs] 6160-005-901 and 6161-020-900)*, dated January 3, 2018;

For the acquisition parcels:

- SCS Engineers, *Phase 1 Environment Site Assessment: Four-Unit Apartment Building 301 W. Alondra Boulevard, Compton, California 90220 (AIN 6160-006-010)*, dated December 21, 2017;
- SCS Engineers, *Phase 1 Environment Site Assessment: Four-Unit Apartment Building 305 W. Alondra Boulevard, Compton, California 90220 (AIN 6160-006-009)*, dated December 21, 2017;
- SCS Engineers, *Phase 1 Environment Site Assessment: Four-Unit Apartment Building 309 W. Alondra Boulevard, Compton, California 90220 (AIN 6160-006-008)*, dated December 21, 2017;
- SCS Engineers, *Phase 1 Environment Site Assessment: Four-Unit Apartment Building 313 W. Alondra Boulevard, Compton, California 90220 (AIN 6160-006-007)*, dated December 21, 2017;
- SCS Engineers, *Phase 1 Environment Site Assessment: Six-Unit Apartment Building 317 W. Alondra Boulevard, Compton, California 90220 (AIN 6160-006-006)*, dated December 21, 2017;
- SCS Engineers, *Phase 1 Environment Site Assessment: Single-Family Residence 321 W. Alondra Boulevard, Compton, California 90220 (AIN 6160-006-005)*, dated December 21, 2017;
- SCS Engineers, *Phase 1 Environment Site Assessment: Three-Unit Apartment Building 325 W. Alondra Boulevard, Compton, California 90220 (AIN 6160-006-004)*, dated December 21, 2017;

- SCS Engineers, *Phase 1 Environment Site Assessment: Parking Lot 329 W. Alondra Boulevard, Compton, California 90220 (AIN 6160-006-003)*, dated December 21, 2017;
- SCS Engineers, *Phase 1 Environment Site Assessment: Greater True Light Baptist Church, 333 W. Alondra Boulevard, Compton, California 90220 (AIN 6160-006-002)*, dated December 21, 2017;
- SCS Engineers, *Phase 1 Environment Site Assessment: El Patron Car Wash 339 W. Alondra Boulevard, Compton, California 90220 (AIN 6160-006-001)*, dated December 21, 2017; and
- SCS Engineers, *Phase 2 Soil and Soil Vapor Investigation Report: El Patron Car Wash 339 W. Compton, California 90220 (AIN 6160-006-001)*, dated January 18, 2018.

Information from the preliminary geotechnical investigation was also used to prepare this section and is included in **Appendix J** to this Draft EIR:

- Ninyo and Moore, *Preliminary Geological and other Hazards Evaluation*, dated October 31, 2017.

Additional information and analysis regarding potential air quality, noise, and haul truck impacts, including the Health Risk Assessment (HRA) prepared for the proposed Project, can be found in **Section 4.2: Air Quality**, **Section 4.11: Noise**, and **Section 4.13: Transportation and Traffic**, of this Draft EIR.

ENVIRONMENTAL SETTING

Definitions

a. Hazardous Materials

“Hazardous materials” generally refers to hazardous substances that exhibit corrosive, poisonous, flammable, and/or reactive properties and have the potential to harm human health and/or the environment. Hazardous materials are used in products (e.g., household cleaners, industrial solvents, paint, pesticides) and in the manufacturing of products (e.g., electronics, newspapers, plastic products). Hazardous materials can include petroleum, natural gas, synthetic gas, acutely toxic chemicals, and other toxic chemicals that are used in agriculture, commercial, and industrial uses; businesses; hospitals; and households. Accidental releases of hazardous materials have a variety of causes, including highway incidents, warehouse fires, train derailments, shipping accidents, and industrial incidents.

The term “hazardous materials” as used in this section include all materials defined in the California Health and Safety Code. (HSC):

A material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. “Hazardous materials” include, but are not limited to, hazardous substances, hazardous waste, and

*any material that a handler or the unified program agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.*¹

The term includes chemicals regulated as hazardous materials, wastes, or substances by the US Department of Transportation (USDOT), the US Environmental Protection Agency (USEPA), the Department of Toxic Substances Control (DTSC), the California Governor’s Office of Emergency Services (Cal OES), and other agencies. “Hazardous waste” is any hazardous material that has been discarded, except those materials specifically excluded by regulation.² Both hazardous materials that have been intentionally disposed of and inadvertently hazardous wastes are broadly characterized by their ignitability, toxicity, corrosivity, reactivity, radioactivity, or bioactivity. Federal and State hazardous waste definitions are similar but distinct enough that separate classifications are in place for federal Resource Conservation and Recovery Act (RCRA) hazardous wastes and State non-RCRA hazardous wastes. Hazardous wastes require special handling and disposal because of their potential to impact public health and the environment. Some materials are designated “acutely” or “extremely” hazardous under relevant statutes and regulations.

b. Recognized Environmental Conditions

The term “recognized environmental conditions” (RECs) refers to 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 the structures on the property or into the ground, groundwater, or surface water of the property.

c. Historical Recognized Environmental Condition

The term “historical recognized environmental condition” (HREC) is defined as an “environmental condition which in the past would have been considered a recognized environmental condition, but which may or may not be considered a recognized environmental condition currently.” The American Society for Testing and Materials (ASTM) further defines a historical recognized environmental condition by stating “[i]f a past release of any hazardous substances or petroleum products has occurred in connection with the property and has been remediated, with such remediation accepted by the responsible regulatory agency...this condition shall be considered a historical recognized environmental condition.”³

1 California Health and Safety Code (HSC), div. 20, ch. 6.95, art. 1, Section 25501(o).

2 HSC, div. 20, ch. 6.5, art. 8, Section 25124.

3 Nick Albergo, "What the Heck Is a CREC?" (November 12, 2014), <http://edrnet.com/heck-crec-nick-albergo/>.

Regulatory Framework

Hazardous materials and wastes can pose a significant actual or potential hazard to human health and the environment when improperly treated, stored, transported, disposed of, or otherwise managed. Many federal, State, and local programs that regulate the use, storage, and transportation of hazardous materials and hazardous waste are in place to prevent these unwanted consequences.

National, State, regional and local laws, regulations, plans, and guidelines are summarized below. The following regulatory framework discussion does not include all plans and policies that relate to hazards and hazardous materials in the District. Site-specific projects have not been identified, and there may be local jurisdictional plans and policies that are applicable depending on the project site. Specific requirements of these laws, regulations, plans, and guidelines might not be up to date when a proposed site-specific school project undergoes review. These regulatory programs are designed to reduce the danger that hazardous substances may pose to people and businesses under normal daily circumstances and as a result of emergencies and disasters.

a. Federal

Regulating Agencies

US Environmental Protection Agency

The USEPA is the main federal agency responsible for enforcing regulations relating to hazardous materials and wastes, including evaluation and remediation of contamination and hazardous wastes. The agency works collaboratively with other agencies to enforce materials handling and storage regulations and site cleanup requirements. The US Occupational Safety and Health Administration (USOSHA) and the USDOT are authorized to regulate safe transport of hazardous materials.

US Occupational Safety and Health Administration

USOSHA is authorized to regulate safe transport of hazardous materials. Specifically, USOSHA implements regulation related to materials handling. USOSHA requirements are intended to promote worker safety, worker training, and a worker's right to know.

Legislation and Regulations

Comprehensive Environmental Response, Compensation and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)⁴—better known as Superfund—provides federal funds to clean up uncontrolled or abandoned hazardous waste sites, accidents, spills, discharges, and other emergency releases of pollutants and contaminants into the environment. Through CERCLA, USEPA was given authority to seek out those parties responsible for any hazardous release and ensure their cooperation in the cleanup.

Emergency Planning and Community Right-to-Know Act

The Emergency Planning and Community Right-to-Know Act (EPCRA) of 1986,⁵ commonly known as Title III of the Superfund Amendments and Reauthorization Act (SARA), was enacted by Congress as national legislation on community safety. This law was designated to help local communities protect public health, safety, and the environment from chemical hazards. The primary purpose of EPCRA is to inform communities and citizens of chemical hazards in their areas by requiring businesses to report the locations and quantities of chemicals stored on site to state and local agencies. These reports help communities prepare to respond to chemical spills and similar emergencies. Section 313.1 of EPCRA requires manufacturers to report releases to the environment (air, soil, and water) of more than 600 designated toxic chemicals; report off-site transfers of waste for treatment or disposal at separate facilities; implement pollution prevention measures and activities; and participate in chemical recycling. These annual reports are submitted to the USEPA and state agencies. The USEPA maintains and publishes a database that contains information on toxic chemical releases and other waste management activities by certain industry groups and federal facilities. This online, publicly available, national digital database is called the Toxics Release Inventory (TRI) and was expanded by the Pollution Prevention Act of 1990.

To implement EPCRA, Congress required each state to appoint a State Emergency Response Commission (SERC) to coordinate planning and implementation activities associated with hazardous materials. The SERCs were required to divide their states into emergency planning districts and to name a local emergency planning committee (LEPC) for each district. The federal EPCRA program is implemented and administered in California by Cal OES, a SERC, 6 LEPCs, and 83 certified Unified Program agencies (CUPAs).⁶ Cal OES coordinates and provides staff support to the SERC and LEPCs. Broad representation by fire fighters, health officials, government and media representatives, community groups, industrial

4 42 US Code (USC) sec. 9601 et seq. 1980.

5 42 USC sec. 11001 et seq., Emergency Planning and Community Right-to-Know Act (EPCRA) of 1986.

6 California Governor's Office of Emergency Services, "State Emergency Response commission" (2018), accessed March 2018, <http://www.caloes.ca.gov/for-governments-tribal/plan-prepare/hazardous-materials/state-emergency-response-commission>.

facilities, and emergency managers ensures that all necessary elements of the planning process are represented.

Asbestos Hazard Emergency Response Act

The Asbestos Hazard Emergency Response Act (AHERA) provides guidance for the management of asbestos-containing materials (ACMs) in schools. The Asbestos School Hazard Abatement Reauthorization Act (ASHARA) extended AHERA regulations to cover public and commercial buildings. AHERA established regulatory standards for inspections, abatement, and transport and disposal of ACMs.⁷

Resource Conservation and Recovery Act

The 1976 RCRA was the first major federal act regulating the potential health and environmental problems associated with hazardous and nonhazardous solid waste. RCRA and the implementation regulations developed by the USEPA provide the general framework of national hazardous waste management systems. This framework includes the determination of whether hazardous wastes are being generated, techniques for tracking wastes to eventual disposal, and the design and permitting of hazardous waste management facilities. RCRA allows individual states to develop their own program for the regulation of hazardous wastes as long as state regulations are at least as stringent as the RCRA.

Toxic Substances Control Act

The Toxic Substances Control Act of 1976⁸ was enacted by Congress to give the USEPA the ability to track the 75,000 industrial chemicals currently produced or imported into the United States. The USEPA repeatedly screens these chemicals and can require reporting or testing of any that may pose an environmental or human health hazard. It can ban the manufacture and import of chemicals that pose an unreasonable risk. Also, the USEPA has mechanisms in place to track the thousands of new chemicals that industry develops each year with either unknown or dangerous characteristics. It then can control these chemicals as necessary to protect human health and the environment. The act supplements other federal statutes, including the Clean Air Act and the Toxics Release Inventory under EPCRA.

Hazardous Materials Transportation Act

The USDOT, in conjunction with the USEPA, is responsible for enforcement and implementation of federal laws and regulations pertaining to safe storage and transportation of hazardous materials. The Code of Federal Regulations (CFR) Title 49, Sections 171–180, regulates the transportation of hazardous materials,

7 15 USC, sec. 2641 et seq., “Asbestos Hazard Emergency Response,” contains the codified requirements of both AHERA and ASHARA.

8 Toxic Substances Control Act of 1976, 15 USC sec. 2601 et seq.

types of material defined as hazardous, and the marking of vehicles transporting hazardous materials. This act applies to this program because contractors will be required to comply with its storage and transportation requirements that would reduce the possibility of spills.

Code of Federal Regulations

CFR Chapter 40, Part 763, Asbestos-Containing Materials in Schools, contains regulations related to asbestos-containing materials in schools; asbestos worker protection; and prohibition of the manufacture of certain asbestos products.⁹ This CFR contains information on the general local education agency responsibilities; inspection and reinspection of sites; sampling, analysis, and assessment; response actions; and the operations and maintenance involving any asbestos materials in schools.

b. State

Regulating Agencies

Senate Bill (SB) 50, the Leroy Greene School Facilities Act of 1998, created a new State program called the School Facility Program (SFP).¹⁰ The SFP is divided into five major programs: New Construction, Modernization, Critically Overcrowded Schools, Joint Use Projects, and Charter School Facilities.¹¹ To obtain funding for new school construction and modernization projects, school districts must interact with and obtain approval from several State agencies, including the California Department of Education (CDE) School Facilities Planning Division (SFPD), State Allocation Board (SAB), Office of Public School Construction (OPSC), Division of the State Architect (DSA), and DTSC.¹² The roles and responsibilities of these agencies with respect to the SFP are summarized below.

California Environmental Protection Agency

The California Environmental Protection Agency (CalEPA) was created in 1991 with the signing of Executive Order W-5-91 by Governor Pete Wilson. Several State regulatory boards, departments, and offices were placed under the CalEPA umbrella to create a cabinet-level voice for the protection of human health and the environment and to assure the coordinated deployment of State resources. Among those responsible for hazardous materials and waste management are the DTSC, Department of Pesticide Regulation, Regional Water Quality Control Board (RWQCB), and Office of Environmental Health Hazard

9 USEPA, “Code of Federal Regulations: Chapter 40; Part 763—Asbestos” (October 18, 2016), <https://www.epa.gov/asbestos/code-federal-regulations-chapter-40-part-763-asbestos>.

10 California Legislature Information, Senate Bill No. 50, http://www.leginfo.ca.gov/pub/97-98/bill/sen/sb_0001-0050/sb_50_bill_19980827_chaptered.pdf.

11 State Allocation Board Program Review Subcommittee, *School Facility Program Guide* (October 24, 2012), https://www.documents.dgs.ca.gov/opsc/publications/handbooks/sfp_guide.pdf.

12 Office of Public School Construction, *School Facility Handbook* (July 2007), https://www.documents.dgs.ca.gov/opsc/Publications/Handbooks/SFP_Hdbk.pdf.

Assessment. CalEPA also oversees the unified hazardous waste and hazardous materials management regulatory program (Unified Program), which consolidates, coordinates, and makes consistent the following six programs:

- Hazardous Materials Release Response Plans and Inventories (Business Plans)
- Underground Storage Tank Program
- Aboveground Petroleum Storage Tank Act
- Hazardous Waste Generator and On-site Hazardous Waste Treatment Programs
- California Uniform Fire Code: Hazardous Material Management Plans and Inventory Statements
- California Accidental Release Prevention (CalARP) Program.

Department of Toxic Substances Control

DTSC is authorized by EPA to administer the hazardous waste laws and oversee remediation of hazardous wastes sites. Regulations require that DTSC “shall compile and update as appropriate, but at least annually, and shall submit to the Secretary for Environmental Protection, a list of all the following: (1) All hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code (HSC).”¹³

The DTSC regulates hazardous waste, cleans up existing contamination, and looks for ways to reduce the hazardous waste produced in California. Approximately 1,000 scientists, engineers, and specialized support staff ensure that companies and individuals handle, transport, store, treat, dispose of, and clean up hazardous wastes appropriately. Through these measures, DTSC contributes to greater safety for all Californians, and less hazardous waste reaches the environment. DTSC’s role is limited to projects with State funding. DTSC oversight is not required where a State-funded project is statutorily or categorically exempt from CEQA.

The hazardous waste facilities identified in HSC Section 25187.5 are those where DTSC has taken or contracted for corrective action because a facility owner/operator has failed to comply with a date for taking corrective action in an order issued under the HSC, or because DTSC determined that immediate corrective action was necessary to abate an imminent or substantial endangerment.¹⁴

The DTSC has issued numerous advisories and guidance specific to the investigation and cleanup of school sites. School projects conducted under DTSC oversight are required to follow the agency guidance, but

¹³ 22 California Government Code (GOV), Development Permits for Classes of Projects [65960 - 65964.1], sec. 65962.5.

¹⁴ HSC div. 20, ch. 6.5, art. 8, Enforcement [25180. - 25196.], sec. 25187.5.

school districts and others also may refer to the guidance documents when conducting self-directed environmental investigations and remedial activities. Current DTSC technical guidance commonly used for new school projects include:

- *Preliminary Endangerment Assessment Guidance Manual*, January 1994 (revised October 2013)
- *Information Advisory: Clean Imported Fill Material*, October 2001
- *Interim Guidance for Sampling Agricultural Fields for School Sites*, August 26, 2002
- “Fact Sheet: PCBs in Schools: Voluntary Lighting Retrofits Can Address Hidden Dangers and Liabilities,” February 2003
- *Interim Guidance: Naturally Occurring Asbestos (NOA) at School Sites*, September 24, 2004
- *Advisory on Methane Assessment and Common Remedies at School Sites*, April 26, 2005
- *Interim Guidance: Evaluation of School Sites with Potential Soil Contamination as a Result of Lead from Lead-Based Paint, Organochlorine Pesticides from Termiticides, and Polychlorinated Biphenyls from Electrical Transformers*, June 9, 2006
- *Arsenic Strategies: Determination of Arsenic Remediation Development of Arsenic Cleanup Goals for Proposed and Existing School Sites*, March 21, 2007
- *School Environmental Assessment Manual (SEAM), Interim Guidance Document for Environmental Assessments and Investigations of School Sites*, August 2008 (Draft)
- *Evaluation of Biogenic Methane*, March 28, 2012
- *Advisory: Active Soil Gas Investigations*, Joint Document with Los Angeles and San Francisco Regional Water Quality Control Boards, April 2012.

Certified Unified Program Agency

A Certified Unified Program Agency (CUPA) is a local agency certified by CalEPA to implement the local Unified Program. The CUPA can be a county, city, or joint powers authority. A participating agency is a local agency that has been designated by the local CUPA to administer one or more Unified Programs within their jurisdiction on behalf of the CUPA. A designated agency is a local agency that has not been certified by CalEPA to become a CUPA but is the responsible local agency that would implement the six Unified Programs until they are certified.

Currently, there are 83 CUPAs in California. The Compton Fire Prevention Division has oversight responsibilities for hazardous materials, community right-to-know, and accidental release prevention programs. The Compton Fire Department (CFD) was certified by CalEPA as a participating agency for the City of Compton in 1995. The Division conducts both CUPA regulatory inspections and Fire Code

inspections for all program elements, with the exception of the hazardous waste program. The Los Angeles County CUPA oversees hazardous waste, underground storage tanks and aboveground tanks.

CDE School Facilities Planning Division

The role of the SFPD is to review and approve school district sites and construction plans. Prior to approving a site for school purposes, the SFPD reviews many factors, including environmental hazards, proximity to airports, freeways, and power transmission lines. In most cases, the district must have completed the process of identifying the site and must have SFPD approval for the site prior to applying for site acquisition funding. As previously discussed, the CDE is given the authority in law to develop standards for school site acquisition related to the educational merit and the health and safety issues of the site. The CDE uses these standards to review a site and determine if it is an appropriate location for a school facility. The CDE's *School Site Selection and Approval Guide*¹⁵ addresses the site selection standards in detail.

State Allocation Board

SAB is responsible for determining the allocation of State resources, including proceeds from General Obligation Bonds and other designated State funds used for new construction and modernization of public school facilities. The SAB meets once a month to review and approve applications for eligibility and funding; act on appeals; and adopt policies and regulations as they pertain to the programs under its purview.

Office of Public School Construction

The OPSC serves the more than 1,000 public K–12 school districts in California. As staff to the SAB, the OPSC is responsible for allocating State funding for eligible new construction and modernization projects for California public school children. The OPSC is responsible for verifying that all applicant school districts meet specific criteria based on the type of eligibility or funding that is being requested and assisting school districts with the application process. The OPSC ensures that funds are allocated properly and in accordance with the law and decisions made by the SAB.

Division of State Architect

The primary role of the DSA in the school construction process is to review plans and specifications to ensure that they comply with California's building codes, with an emphasis on structural and seismic safety. The DSA reviews working drawings submitted by districts to ensure that the proposed structures

15 California Department of Education, *School Site and Approval Guide* (2004), <http://www.cde.ca.gov/ls/fa/sf/schoolsiteguide.asp>,

meet codes and requirements for construction, fire and life safety, and universal design compliance. DSA approval of all plans and specifications is required prior to a construction contract being signed for new construction, modernization, or alteration of any State-funded school building.

California Occupational Safety and Health Administration

The California Occupational Safety and Health Administration (Cal/OSHA) has set forth work requirements for disturbance of ACMs, including removal operations for all types of ACMs. In addition, the agency has developed standards for general industry and the construction industry hazardous waste operations and emergency response. Cal/OSHA ensures that employers must have controls to reduce and monitor exposure levels of hazardous materials; and oversees an informational program describing any exposure during operations and the inspection of drums and containers prior to removal or opening. Decontamination procedures and emergency response plans must be in place before employees begin working in hazardous waste operations.

California Office of Emergency Services

The Cal OES Hazardous Materials (HazMat) Section under the Fire and Rescue Division coordinates Statewide implementation of hazardous materials accident prevention and emergency response programs for all types of hazardous materials incidents and threats. In response to any hazardous materials emergency, the section staff is called on to provide State and local emergency managers with emergency coordination and technical assistance.

Legislation and Regulations

Senate Bill 14: California Hazardous Waste Source Reduction and Management Review Act of 1989

The California Hazardous Waste Source Reduction and Management Review Act of 1989, also known as SB 14, required large-quantity generators—those that annually produce more than 13.2 tons of hazardous waste or 26.4 pounds of extremely hazardous waste—to periodically conduct a source evaluation of their facilities and develop plans to reduce their volume of hazardous waste through measures such as changes in raw materials production methods, product reformulations, and employee training.¹⁶ The primary objective of the legislation was to reduce the quantity of hazardous waste generated in California and thereby promote public health and improve environmental quality. Generators that exceed the

16 California Department of Toxic Substances Control (DTSC), “SB14 Introduction and Overview” (July 2012), http://www.dtsc.ca.gov/PollutionPrevention/SB14/SB14_Intro.cfm.

aforementioned waste volume thresholds are required to file waste minimization reports with DTSC every 4 years.

California Code of Regulations

The California Code of Regulations (CCR), Section 14010 (Title 5) has several standards that are considered in the selection of new school sites.¹⁷ CCR Title 5 requirements that relate to the identification and mitigation of potential health risks and safety hazards are summarized below:

- **Section 14010(c).** The property line of the site, even if it is part of a joint use agreement, shall be at least the following distance from the edge of respective power line easements:
 - 100 feet for a 50–133 kV line,
 - 150 feet for a 220–230 kV line, and
 - 350 feet for a 500–550 kV line.

This is addressed below under **Threshold HAZ-3**.

- **Section 14010(d).** If the proposed site is within 1,500 feet of a railroad track easement, a safety study shall be done by a competent professional to assess potential rail safety hazards and identify possible and reasonable mitigation measures. This is addressed below under **Threshold HAZ-12**.
- **Sections 14010(e) and (l).** The site shall not be located adjacent to a road or freeway that any site-related traffic study has determined will pose a safety problem. The site shall not be on major arterial streets with a heavy traffic pattern unless mitigation of traffic hazards and a plan for the safe arrival and departure of students has been prepared in accordance with Caltrans's *School Area Pedestrian Safety Manual*. This is analyzed in **Section 4.13: Transportation and Traffic** of this Draft EIR.
- **Section 14010(f).** Pursuant to Education Code Sections 17212 and 17212.5, the site shall not contain an active earthquake fault or fault trace. This is analyzed in **Section 4.6: Geology and Soils** of this Draft EIR.
- **Section 14010(g).** Pursuant to Education Code Sections 17212 and 17212.5, the site is not within an area of flood or dam flood inundation unless the cost of mitigating the flood or inundation impact is reasonable. This is analyzed in **Section 4.9: Hydrology and Water Quality** of this Draft EIR.
- **Section 14010(h).** The site shall not be located near an aboveground water or fuel storage tank or within 1,500 feet of the easement of an aboveground or underground pipeline that can pose a safety hazard, as determined by a risk analysis study conducted by a competent professional. This is addressed below under **Threshold HAZ-7**.

17 California Department of Education, Title 5, California Code of Regulations Section 14010 (March 14, 2018), <https://www.cde.ca.gov/ls/fa/sf/title5regs.asp>.

- **Section 14010(i).** The site is not subject to moderate to high soil liquefaction or landslides. This is analyzed in **Section 4.6** of this Draft EIR.
- **Section 14010(m).** Existing or proposed zoning of the surrounding properties shall be compatible with schools in that it would not pose a potential health or safety risk to students or staff in accordance with Education Code Section 17213. This is analyzed in **Section 4.10: Land Use** of this Draft EIR.
- **Section 14010(q).** The district shall consider environmental factors of light, wind, noise, aesthetics, and air pollution in its site selection process. This is analyzed in **Sections 4.1,, 4.2,** and **Section 4.11** of this Draft EIR.
- **Section 14010(t).** If the proposed site is on or within 2,000 feet of a significant disposal of hazardous waste, the school district shall contact the DTSC for a determination of whether the property should be considered a Hazardous Waste Property or Border Zone Property. This is addressed below under **Threshold HAZ-8.**

Cal/OSHA Construction Safety Orders

CCR regulates asbestos exposure in all work as defined in Title 8, Section 1502, including demolition or salvage of structures where asbestos is present; removal or encapsulation of materials containing asbestos; construction, alteration, repair, maintenance, or renovation of structures, substrates, or portions thereof that contain asbestos; installation of products containing asbestos; asbestos spill/emergency cleanup; transportation, disposal, storage, containment of, and housekeeping activities involving asbestos or products containing asbestos, on the site or location at which construction activities are performed; and excavation that may involve exposure to asbestos as a natural constituent not related to asbestos mining and milling activities.

California Education Code

The California Education Code (EDC) sets several legal requirements for the evaluation of hazards and hazardous materials designed to ensure that school sites and school facilities are safe for students, staff, and visitors. The CDE, supported by the DTSC, has been assigned primary responsibility for ensuring that any new properties acquired for school construction or existing school properties used for school expansion are free from hazardous conditions that would endanger the health or safety of students and staff.

Requirements relevant to the evaluation of hazards are principally found in EDC Sections 17072, 17210, 17213, 17215, 17251, and 17268.¹⁸ School districts using State funding for site acquisition or expansion of existing school sites are required to receive approval from the CDE SFPD to proceed with project

18 California Education Code (EDC), Title 1 (October 14, 2001). Text of the complete code can be found at <https://leginfo.legislature.ca.gov/faces/codesTOCSelected.xhtml?tocCode=EDC&tocTitle=+Education+Code+-+EDC>.

construction. In turn, the SFPD is required to certify to the OPSC that the school site is free from toxic contamination that would be unsafe for students and staff. Specific requirements of the EDC are as follows:

- **Phase I Environmental Site Assessment (ESA).** Per EDC Sections 17210 and 17213.1, prior to site acquisition (or if the district owns or leases a school site, prior to project construction), the district shall arrange for a qualified environmental assessor to prepare a Phase I ESA. If the Phase I ESA concludes that further investigation of the site is not required and the DTSC concurs, the district may proceed with the acquisition or construction project without further environmental investigation.
- **Preliminary Endangerment Assessment (PEA).** Per Education Code Section 17213.1, if the Phase I ESA and/or the DTSC conclude that further investigation of the site is needed, the district shall arrange for a qualified environmental assessor to conduct a PEA. The district shall also enter into an Environmental Oversight Agreement with the DTSC to oversee the preparation and implementation of the PEA. Alternatively, the district may elect to not pursue the acquisition or construction project. If the PEA concludes that further investigation of the site is not required and the DTSC concurs, the district may proceed with the acquisition or construction project. At the same time, the district shall make the PEA available for public review and comment. If the PEA determines that a release of hazardous material has occurred, the district may elect not to pursue the acquisition or construction project.
- **Response Actions.** Per EDC Section 17213.2, if the PEA discloses the presence of a hazardous materials release, or threatened release, or the presence of naturally occurring hazardous materials at a proposed school site at concentrations that could pose a significant risk to humans, and the district acquires or already owns the site, the district shall enter into a School Cleanup Agreement with the DTSC and undertake response actions to clean up the site. The district need not take action in response to a release of hazardous material to groundwater underlying the site if the release originates from an off-site source. However, the district is obligated to take response actions, as required, to protect future occupants of the site from potential health risks and hazards posed by the contaminated groundwater, such as the off-gassing of volatile organic compounds from underlying groundwater into building indoor air. The district may not begin construction of a school building until the DTSC determines that (1) the construction will not interfere with the response action, (2) site conditions do not pose a significant threat to the health and safety of the construction workers, and (3) the nature and extent of the contamination have been thoroughly characterized. If a previously unidentified release of hazardous materials is discovered during construction, the district shall cease all construction activities, notify the DTSC, and take actions necessary to address the release. The district may not occupy a school building following construction until the DTSC certifies that all necessary response actions, except for operation and maintenance activities, have been completed and the site no longer poses a significant risk to humans.
- **Environmental Hardship.** Per EDC Section 17072.13, a district may request environmental hardship status and secure State funding prior to final SFPD approval if the DTSC estimates that the necessary

response action will take at least 6 months to complete and the SFPD determines that the site is the best available alternative site.

- **Site Hazards.** Per EDC Section 17213(a), a district may not acquire a school site unless it has determined that the property is not the site of a current or former hazardous or solid waste disposal site, unless the site was a former solid waste disposal site and the wastes have been removed.
- A hazardous substance release site identified by the DTSC in a current list for removal or remedial action (see Section 5.8.1.2) is as follows.
 - A site that contains one or more pipelines (underground or aboveground) that convey hazardous substances, acutely hazardous substances, or hazardous wastes, unless it is a natural gas line that is used only to supply natural gas to the school or neighborhood.
- **Traffic Hazards.** Per EDC Section 17251, the CDE shall advise a district on the suitability of a proposed school site, based on factors that include safety and reduction of traffic hazards.¹⁹ To assist with this evaluation, the CDE has established standards for use by districts to ensure that the design and construction of school facilities are educationally appropriate and promote school safety. The CDE also provides information relating to the impact or potential impact upon any school site of hazardous substances, solid waste, safety, and hazardous air emissions. The CDE has developed specific standards to implement Section 17251 of the EDC known as Title 5 requirements.
- **Air Toxics.** Per EDC Section 17213(b), when preparing the CEQA support documents for a project, the district shall consult with the local air quality management district to identify facilities that might emit hazardous air emissions or handle hazardous or acutely hazardous materials, substances, or waste, including freeways and other busy traffic corridors, large agricultural operations, and rail yards within one-quarter mile of the site.²⁰ Per EDC Section 17213(c), if any such facilities are identified, the district must make one of the following findings:
 - The health risks from the identified facilities do not and will not constitute an actual or potential endangerment of public health to persons who would attend or be employed at the school.
 - Corrective measures required under order by another agency having jurisdiction over the facilities will, before the school is occupied, result in the mitigation of all chronic or accidental air emissions to levels that do not constitute an actual or potential endangerment of public health to persons who would attend or be employed at the proposed school. If this finding is made, the district shall make a subsequent finding, prior to occupancy at the school, that the emissions have been so mitigated.
 - Per EDC Section 17213(c), the district must perform a health risk assessment if a proposed school site is within 500 feet of a freeway or other busy traffic corridor, and either (1) find that air emissions from the freeway pose no significant short-term or long-term health risk to pupils or (2) adopt a Statement of Overriding Considerations on the grounds the district is unable to locate

¹⁹ EDC, sec. 17251 (January 1, 2018).

²⁰ EDC, sec. 17251 (January 1, 2018).

an alternative site that is suitable due to a severe shortage of sites that meet the requirements of Section 17213(a).

- **Airport Safety.** Per EDC Section 17215, a district is required to provide the CDE written notice before acquiring title to property for a new school site if the proposed site is within two nautical miles of an airport runway or a potential runway included in an airport master plan. The CDE must then notify the California Department of Transportation (Caltrans), Division of Aeronautics, which in turn would investigate the proposed site and submit a written report of its findings, including recommendations concerning acquisition of the site. As part of the investigation, the owner and operator of the airport would be granted the opportunity to comment on the proposed school site. If the written report does not favor the acquisition of the property for a school site, State funds or local funds cannot be used for acquisition of or school construction at the site. EDC Section 17215 does not apply to school sites acquired prior to January 1, 1966, nor to any additions or expansions to those sites. Specific Caltrans regulations that elaborate on the school site evaluation process are found in CCR Title 21, Division 2.5, Chapter 2.1, Section 3570.3
- **Applicability.** Per EDC Section 17268, school districts that are not using State funding for construction of a new school building still need to comply with Section 17213(a), as summarized above, for identification of a hazardous or solid waste disposal site, hazardous substance release site, and hazardous substance pipeline. Districts that want to use State funding may not approve construction of a new school building or a school site on leased or acquired land unless it complies with the requirements of Sections 17213.1 and 17213.2, as summarized above. However, if a project is eligible for a statutory or categorical exemption under CEQA, Sections 17213.1 and 17213.2 requirements do not apply.

The following statutory and regulatory requirements relate to new school construction or modification projects in instances when a school district is not using State funding (also referred to as locally funded projects):

- Per EDC Section 17210.1, a district is not subject to DTSC oversight and requirements of Sections 17213.1 and 17213.2 unless it is using State funding. However, such school sites may voluntarily participate in the DTSC's school environmental review process.
- New school construction projects that do not use State funding are not required to be approved by CDE. However, locally funded projects are still required to comply with the property evaluation and public noticing requirements of CCR Title 5, Section 14012. CCR Title 5, Section 14012(a), requires that districts using local funding evaluate potential hazards and hazardous materials at proposed school sites in accordance with standards in CCR Title 5, Sections 14010 and 14011(e) through (l).

California Emergency Response Plan

California has developed an emergency response plan to coordinate emergency services provided by federal, State, and local governments and private agencies. Responding to hazardous materials incidents is one part of this plan. The plan is administered by Cal OES, which coordinates the responses of other

agencies, including CalEPA, the California Highway Patrol, the RWQCB, and the local fire department. The Los Angeles County Fire Department provides first-response capabilities, if needed, for hazardous materials emergencies within the Project area.

Assembly Bill 387 (Wildman) and Senate Bill 162 (Escutia) School Facilities: Contamination

Assembly Bill 387 and SB 162 both address contamination at school facilities. The bills provide a comprehensive program to ensure that hazardous material contamination issues are adequately addressed prior to school development. The program involves the preparation of a Phase 1 ESA to determine whether a release of a hazardous material has occurred on site in the past or if there may be a naturally occurring hazardous material present within a site.

Hazardous Waste Control Act

The Hazardous Waste Control Act (HWCA) is the State equivalent of RCRA and regulates the generation, treatment, storage, and disposal of hazardous waste.²¹ This act implements the RCRA “cradle-to-grave” waste management system in California but is more stringent in its regulation of non-RCRA wastes, spent lubricating oil, small-quantity generators, and transportation and permitting requirements, as well as in its penalties for violations. HWCA applies to the Project because contractors will be required to comply with its hazardous waste requirements to reduce the possibility of spills.

Hazardous Materials Management Plans

In January 1996, CalEPA adopted regulations implementing a Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program).²² As noted previously, the six program elements of the Unified Program are hazardous waste generators and hazardous waste on-site treatment; underground storage tanks; aboveground storage tanks; hazardous material release response plans and inventories; risk management and prevention programs; and Uniform Fire Code hazardous materials management plans and inventories. The program is implemented at the local level by a local agency, the CUPA which is responsible for consolidating the administration of the six program elements within its jurisdiction.

State and federal laws require detailed planning (1) to ensure that hazardous materials are properly handled, used, stored, and disposed of; and (2) in the event that such materials are accidentally released, to prevent or to mitigate injury to health or the environment.

21 DTSC, 2014 California Hazardous Waste and Hazardous Substances Law Code excerpts.

22 CalEPA, “Unified Program,” <https://calepa.ca.gov/cupa/>.

California Hazardous Materials Release Response Plans and Inventory Law of 1985 (Business Plan Act)

The Business Plan Act requires preparation of hazardous materials business plans and disclosure of hazardous materials inventories, including an inventory of hazardous materials handled, plans showing where hazardous materials are stored, an emergency response plan, and provisions for employee training in safety and emergency response procedures (HSC, Division 20, Chapter 6.95, Article 1).²³ Statewide, DTSC has primary regulatory responsibility for management of hazardous materials, with delegation of authority to local jurisdictions that enter into agreements with the State. Local agencies are responsible for administering these regulations. Several State agencies regulate the transportation and use of hazardous materials to minimize potential risks to public health and safety, including CalEPA and Cal OES. The California Highway Patrol and Caltrans enforce regulations specifically related to the transport of hazardous materials. Together, these agencies determine container types used and license hazardous waste haulers for hazardous waste transportation on public roadways. The Business Plan Act applies to this program because contractors will be required to comply with its handling, storage, and transportation requirements that would reduce the possibility of spills, and to prepare an emergency response plan to respond to accidental spills.

California Government Code Section 65962.5: Cortese List

The provisions of Government Code Section 65962.5 are commonly referred to as the Cortese List.²⁴ The Cortese List is a planning document used by State and local agencies to provide information about hazardous materials release sites. Section 65962.5 requires CalEPA to develop an updated Cortese List annually, at minimum. DTSC is responsible for a portion of the information contained in the Cortese List. Other State and local government agencies are required to provide additional hazardous material release information for the Cortese List.

c. Regional

South Coast Air Quality Management District

The South Coast Air Quality Management District (SCAQMD) regulates asbestos through Rule 1403, Asbestos Emissions from Renovation/Demolition Activities. Rule 1403 regulates asbestos as a toxic material and controls the emissions of asbestos from demolition and renovation activities by specifying agency notifications, appropriate removal procedures, and handling and cleanup procedures. Rule 1403

23 HSC, art. 1, Business and Area Plans (January 1, 2014), https://leginfo.ca.gov/faces/codes_displayText.xhtml?lawCode=HSC&division=20.&title=&part=&chapter=6.95.&article=1.

24 CalEPA, "Background and History" <https://calepa.ca.gov/sitecleanup/corteselist/background/>.

applies to owners and operators involved in the demolition or renovation of asbestos-containing structures, asbestos storage facilities, and waste disposal sites. SCAQMD also regulates volatile organic compound (VOC) emissions from contaminated soil through Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil. Rule 1166 sets requirements to control the emission of VOCs from excavating, grading, handling, and treating soil contaminated with VOCs as a result of leakage from storage or transfer operations, accidental spillage, or other deposition.

d. Local

City of Compton

Office of Emergency Management

The City of Compton Office of Emergency Management (OEM) is responsible for coordinating emergency mitigation, planning, response, and recovery efforts for all disasters or other major emergencies affecting the City of Compton. This includes developing and implementing community outreach activities and educational programs; management and oversight of the City's Emergency Operations Center, the Community Emergency Response Team (CERT) volunteer program, and the City's emergency notification system; providing ongoing training for City staff; and regularly updating and maintaining the City's Emergency Operations Plan and Hazard Mitigation Plan.

Compton OEM also works closely with numerous municipalities, Los Angeles County, State, and federal agencies, the private sector, and non-governmental, community, and faith-based organizations to ensure that residents, businesses, City employees, and community stakeholders are prepared as possible in the event of a natural or man-made disaster.

Compton General Plan

The City's existing General Plan was adopted in December 1991, with its 2030 Comprehensive General Plan Update currently in the working draft stages. The General Plan serves as a blueprint for planning and development in the City and indicates the community's vision for the future. The adopted Public Safety Element of the Compton General Plan²⁵ is one of seven State-mandated Elements. It is intended to identify natural and man-made hazards and ways to reduce the risk of property damage, injury, or loss of life associated with living in an urban environment. The public's health and safety is an important component of the Compton General Plan due to the City's location in a seismically active region. The

25 City of Compton, *General Plan, "Public Safety Element"* (December 3, 1991).

Element's scope includes emergency preparedness and response for potential flooding, fire, hazardous materials, and other public safety threats.

Existing Conditions

a. Project Site

The Project Site consists of the existing CHS campus, comprising approximately 40 acres, and the acquisition area to the southeast, comprising approximately 2 acres, for a total of 42 acres. Uses on the acquisition parcels include a car wash, church, and multifamily residences.

Surrounding land uses to the north and east, located along W. Myrrh Street and S. Acacia Avenue, consist of single- and multifamily residential uses. The District's maintenance and storage yard facility is located directly northwest of the Project Site, adjacent to Compton Creek. Additionally, the City of Compton City Hall and Civic Center is located just northeast of the Project Site at S. Acacia Avenue and W. Myrrh Street.

Proximity to Health Risks and Safety Hazard Identified in CCR Section 14010 (Title 5)

CCR Title 5, Section 14010 has several standards that are considered in the selection of new school sites. CCR Title 5 requirements that relate to the identification and mitigation of potential health risks and safety hazards are as follows:

- Per CCR Section 14010(c), there are 4 kV transmission power lines along S. Oleander Avenue (passing north–south through the central portion of the site) and W. Cocoa Street (adjacent to south of the site). There are 16 kV transmission power lines along W. Myrrh Street (adjacent to the north of the site), along S. Oleander Avenue (passing north–south through the central portion of the site), and along the west boundary of the site.
- Per CCR Section 14010(d), potentially hazardous transportation surrounding the site includes train tracks.²⁶ The Metro Blue Line is the closest train to the Project Site, located approximately 670 feet east of the site.
- Per CCR Section 14010(h), pipelines near the Project Site include:
 - A petroleum gas transmission pipeline that parallels Rosecrans Avenue, approximately 0.8 miles north of the site;
 - A hazardous liquid pipeline containing crude oil that parallels Alameda Street, approximately 0.4 miles east of the site;

26 California Department of Education, Title 5, California Code of Regulations, <https://www.cde.ca.gov/ls/fa/sf/title5regs.asp>.

- A natural gas transmission pipeline²⁷ that parallels S. Central Avenue, located approximately 1.15 miles to the west of the site;
- Other non-high-pressured lines (3-inch or less in diameter), including natural gas pipelines parallel to W. Laurel Street, W. Myrrh Street, S. Oleander Avenue, S. Acacia Avenue, and W. Alondra Boulevard with lateral 0.5 and 1-inch connection lines to the site; and
- Other pipelines not considered high pressure that are located near the Project Site, including include domestic water and transmission lines. Domestic water lines beneath W. Laurel Street (6-inch-diameter piping) with lateral service, S. Oleander Avenue (12-inch-diameter piping) with lateral service, W. Myrrh Street (4-inch-diameter cast iron piping) with lateral service, S. Acacia Avenue (6-inch cast iron piping) with lateral service, and W. Alondra Boulevard (10- and 12-inch-diameter piping). The pipe diameters for the lateral water service lines range from 1 to 2 inches.

b. Past Uses and Operations at the Project Site

Existing School Site

The Project Site includes the existing 40-acre CHS campus (Assessor's Identification Numbers [AINs] 6160-005-901 and 6161-020-900).

Historically, the campus, comprising approximately 40 acres, was developed for residential uses from as early as 1894. By 1907, the northeast corner of the eastern parcel was developed as the Compton Union High. By the late 1930s, increased development occurred, and the campus was identified as the Compton Junior College. By the 1950s, the campus was identified as the Compton Senior School and included the present-day site footprint. From 1907 until around 1980, an auto repair shop, machine shop, and carpentry shop were located at the campus as part of the school programs.²⁸ It is assumed that hazardous chemicals and waste were stored at the campus during this time.

Acquisition Parcels

The Project Site includes 10 parcels of land along the southeast of the campus that are proposed for acquisition by the District (AINs 6160-006-001, -002, -003, -004, -005, -006, -007, -008, -009, and -010). A description of the use and history of each of this is provided.

301 W. Alondra Boulevard (AIN 6160-006-010): This parcel contains a 1-story, 4-unit apartment building; a detached 1-story, four-car garage with a laundry room, and landscaped areas. The structures on this

²⁷ According to Converse Consultants' Phase I Environmental Site Assessment (ESA) for the existing CHS campus, transmission lines are "generally large diameter pipelines that operate at pressures above 200 pounds per square inch (psi) and transport gas from supply points to the gas distribution system." Converse Consultants, *Phase I Environmental Site Assessment Report, Compton High School 601 S. Acacia Avenue, Compton, California [Phase I ESA Report]* (January 3, 2018).

²⁸ Converse Consultants, *Phase I ESA Report*.

parcel were built in 1957, and the site has since been used as multifamily residence. Prior to the construction of the existing apartment building and garage, this property was occupied by a residential structure with a detached garage from at least 1925 to at least 1953; prior to that date, the parcel consisted of vacant, undeveloped land from at least 1896 to 1924.

305 W. Alondra Boulevard (AIN 6160-006-009): This parcel contains a 1-story, 4-unit apartment building, a detached 1-story, four-car garage with a laundry room, and landscaped areas. The structures were built in 1957, and the site has since been used as multifamily residence. Prior to the construction of the existing apartment building and garage, this property was occupied by a residential structure with a detached garage from at least 1925 to at least 1953; prior to that date, the parcel consisted of vacant, undeveloped land from at least 1896 to 1924.

309 W. Alondra Boulevard (AIN 6160-006-008): This parcel contains a 1-story, 4-unit apartment building, a detached 1-story, four-car garage with a laundry room, and landscaped areas. The structures were built in 1957, and the site has since been used as multifamily residence. Prior to the construction of the existing apartment building and garage, this property was occupied by a cabinet shop in 1924 and a residential structure with a detached garage from at least 1925 to at least 195. Prior to that date, the property consisted of vacant, undeveloped land from at least 1896 to 1924.

313 W. Alondra Boulevard (AIN 6160-006-007): This parcel contains a 1-story, 4-unit apartment building, a detached 1-story, four-car garage with a laundry room, and landscaped areas. The structures were built in 1957, and the site has since been used as multifamily residence. Prior to the construction of the existing apartment building and garage, the property was vacant undeveloped land from roughly 1896 to 1953.

317 W. Alondra Boulevard (AIN 6160-006-006): This parcel contains a 1-story, 6-unit, apartment building with a detached 1-story, three-car garage and landscaped areas. The structures were built in 1956, and the site has since been used as multifamily residence. Prior to the construction of the existing apartment building and garage, the property was vacant, undeveloped land from roughly 1896 to 1953.

321 W. Alondra Boulevard (AIN 6160-006-005): This parcel contains a 1-story, single-family residence and landscaped areas. The structure was built in 1922 and has served as a single-family residence since then. Prior to the construction of the existing single-family residence, the property was vacant, undeveloped land from roughly 1896 to 1902.

325 W. Alondra Boulevard (AIN 6160-006-004): This parcel contains a 1-story, 3-unit apartment building with an attached 1-story, three-car garage and landscaped areas. The structure was built in 1964 and has served as a multifamily residence since then. Prior to construction of the existing apartment building, the property was undeveloped land from at least 1896 to at least 1963.

329 W. Alondra Boulevard (AIN 6160-006-003): This parcel contains a paved parking lot used by the church on the adjacent property to the west. This property was undeveloped land from at least 1896 to at least 1943. It was occupied by a residential structure from at least 1948 to at least 1994; was a vacant lot/undeveloped land from at least 2001 to at least 2009; and has served as a parking lot from at least 2010 to the present.

333 W. Alondra Boulevard (AIN 6160-006-002): This parcel contains a church building, a detached 1-story storage building, and landscaped areas. The structure was built in 1947 and has served as a church since that time. Prior to the construction of the existing church, the property was undeveloped land from at least 1896 to at least 1943.

339 W. Alondra Boulevard (AIN 6160-006-001): This parcel contains a 1-story car wash building, a detached canopy, and an associated parking lot. The structure was built in 1964 and has been occupied by gasoline service stations, general automotive repairs shops, and car wash facilities. The property consisted of undeveloped land from at least 1896 to at least 1925. Prior to its current address (339 E. Alondra Boulevard), addresses on the property included 339, 339½, and 341 W. Olive Street (which was later renamed W. Alondra Boulevard), and 341 W. Alondra Boulevard. The property was occupied by a residence in the northeast portion by 1928, a residence in the northwest portion by 1938, and a commercial structure (service station, 341 W. Olive Street) in the southwest portion by 1938. The service station was relocated, a restroom building was constructed, and the structure at 339½ W. Olive Street was demolished in 1954. A café at 341 W. Olive Street was demolished in 1955. The residence at 341 W. Olive Street was demolished and a service station was constructed in 1958. The commercial structure currently on the property was constructed in 1964. Numerous automotive services, such as a gasoline service station, general automotive repair shop, and car wash facilities, have previously occupied this parcel.

c. Environmental Site Assessments

Phase I Environmental Site Assessments

Phase I ESAs and a subsequent Phase II Investigation were prepared for the Project. The purpose of the Phase I ESAs was to evaluate Project Site history, existing observable conditions, current Project Site use, and current and historic uses of surrounding properties to identify the potential presence of Recognized RECs, HRECs, and known or suspected environmental conditions in connection with the Project Site. All Project Phase I ESAs state that they were completed in accordance with the ASTM Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (ASTM Standard E 1527-13) and complies with standards and practices set forth in 40 CFR Part 312 for AAI. These Phase 1 ESAs included research of available site background information, including regulatory agency database lists and

agency file searches, and did not reveal documentation of any known release(s) of hazardous materials at the site.

Existing School Site

Based on the findings of the Phase 1 ESA for the campus, no evidence of RECs in connection with the CHS campus was discovered except for the following, for which recommendations are provided:

- An underground storage tank (UST) is located on the property in the basement of the administration building. The tank is used to fuel the boiler located in the building. It is recommended that this UST be appropriately removed and disposed of offsite.
- Also, within the administration building are two hydraulic elevators. It is recommended that these elevators be appropriately removed and disposed of offsite.
- The contiguous adjacent El Patron Car Wash due diligence acquisition report should be reviewed to evaluate if there is concern to the property.
- According to Los Angeles Department of Public Works Well Finder Database,²⁹ a well is located on the western portion of the property. It is recommended this on-site well be abandoned properly if not in use.

In addition, the Phase I ESA identified the following concerns and recommendations:

- Based on historic uses of the former manual arts building, a Supplemental Site Investigation Work Plan is recommended after a scoping meeting with the DTSC.
- As a result of potential lead-based paint (LBP) residue from various structures, a Supplemental Site Investigation Work Plan is recommended after a scoping meeting with the DTSC.
- Based on the potential presence of termiticides from structures, a Supplemental Site Investigation Work Plan is recommended after a scoping meeting with the DTSC.

Based on the above, the CHS campus was identified three (3) times on the CA HAZNET database,³⁰ as an RCRA Small Quantity Generator (SQG), on the Facility Index System (FINDS) (manifest) database, and the Enforcement and Compliance History Online (ECHO) database.³¹

Wastes manifested at the CHS campus included other organic solids, laboratory wastes chemicals, unspecified aqueous solution, empty containers less than 30 gallons in volume, asbestos-containing wastes, polychlorinated biphenyls (PCBs), and material containing PCBs. No violations were noted. Based

29 Los Angeles Department of Public Works, *Groundwater Wells*, <http://dpw.lacounty.gov/general/wells/>.

30 DTSC, Hazardous Waste Manifest Information, <http://www.dtsc.ca.gov/IDManifest/Manifests.cfm>

31 USEPA, Enforcement and Compliance History Online, database, <https://echo.epa.gov/>.

on the wastes being manifested and lack of violations, these listings are not expected to represent an environmental concern to the CHS campus.

Given most of the buildings on the CHS campus were built around the 1930s, asbestos and LBP may be present on site. Additionally, based on the age of the school buildings, in accordance with DTSC guidelines, organochlorine pesticides (termiticide) and LBP may also be present in shallow soils around building foundations.

Based upon the information derived from the Phase 1 ESA for the CHS campus, the site is not identified as a known hazardous waste disposal site, hazardous substance release site, or landfill, and no hazardous materials pipelines are located beneath or adjacent to the site.³²

Acquisition Sites

Based upon the information derived from the Phase 1 ESAs for the acquisition parcels, most of the parcels are not identified as known hazardous waste disposal sites, or landfill, and no hazardous materials pipelines are located beneath or adjacent to the parcels. However, the County of Los Angeles Department of Public Works (LADPW) has permitted the carwash industrial waste discharge. Based on the findings of the Phase 1 ESAs for these acquisition parcels, no evidence of RECs in connection with the parcels were discovered except for the following, for which recommendations are also provided. However, the parcel for the car wash and potentially for the adjacent church may have potential hazardous materials though the industrial waste discharge is permitted by the LADPW. The results of each of the Phase I ESAs for the acquisition parcels are provided.

301 W. Alondra Boulevard (AIN 6160-006-010): No chemicals or hazardous substances were observed to be stored on the property. Additionally, the property was not identified in any of the standard environmental records sources within the environmental data resources (EDR) regulatory database. The insides of the units were not searched during the site visit. The site investigation revealed no evidence of conditions indicative of release or threatened releases of hazardous substances. Based on the known or likely original construction date for the structure on the property (1964), it is likely that ACMs and LBP are present in building materials.

305 W. Alondra Boulevard (AIN 6160-006-009): No chemicals or hazardous substances were observed to be stored on the property. Additionally, the property was not identified in any of the standard environmental records sources within the EDR regulatory database. The insides of the units were not searched during the site visit. The site investigation revealed no evidence of conditions indicative of

32 Converse Consultants, *Phase I ESA Report*.

release or threatened releases of hazardous substances. Based on the known or probable original construction date for the structure on the property (1964), it is likely that ACMs and LBPs are present in building materials.

309 W. Alondra Boulevard (AIN 6160-006-008): No chemicals or hazardous substances were observed to be stored on the property. Additionally, the property was not identified in any of the standard environmental records sources within the EDR regulatory database. The insides of the units were not searched during the site visit. The site investigation revealed no evidence of conditions indicative of release or threatened releases of hazardous substances. Based on the known or probable original construction date for the structure on the property (1964), it is likely that ACMs and LBPs are present in building materials.

313 W. Alondra Boulevard (AIN 6160-006-007): No chemicals or hazardous substances were observed to be stored on the property. Additionally, the property was not identified in any of the standard environmental records sources within the EDR regulatory database. The insides of the units were not searched during the site visit. The site investigation revealed no evidence of conditions indicative of release or threatened releases of hazardous substances. Based on the known or likely original construction date for the structure on the property (1964), it is likely that ACMs and LBPs are present in building materials.

317 W. Alondra Boulevard (AIN 6160-006-006): No chemicals or hazardous substances were observed to be stored on the property. Additionally, the property was not identified in any of the standard environmental records sources within the EDR regulatory database. The insides of the units were not searched during the site visit. The site investigation revealed no evidence of conditions indicative of release or threatened releases of hazardous substances. Based on the known or probable original construction date for the structure on the property (1964), it is likely that ACMs and LBPs are present in building materials.

321 W. Alondra Boulevard (AIN 6160-006-005): No chemicals or hazardous substances were observed to be stored on the property. Additionally, the property was not identified in any of the standard environmental records sources within the EDR regulatory database. The insides of the units were not searched during the site visit. The site investigation revealed no evidence of conditions indicative of release or threatened releases of hazardous substances. Based on the known or probable original construction date for the structure on the property (1964), it is likely that ACMs and LBPs are present in building materials.

325 W. Alondra Boulevard (AIN 6160-006-004): Chemicals observed on site were limited to small quantities of household cleaning supplies and were stored correctly. The property was not identified in any of the standard environmental records sources within the EDR regulatory database. The insides of two of the three units were not searched during the site visit. The site investigation revealed no evidence of conditions indicative of release or threatened releases of hazardous substances. Based on the known or probably original construction date for the structure on the property (1964), it is likely that ACMs and LBPs are present in building materials.

329 W. Alondra Boulevard (AIN 6160-006-003): No chemicals or hazardous substances were observed to be stored on the property. The property was identified in the EDR regulatory data base report as a CA HAZNET site based on data from hazardous waste manifests for disposal of asbestos-containing wastes in 1994. This may be associated with the demolition of the residential structure that had been located on the property. No reports of lead-based contamination were found, and there are no existing properties on the site; therefore, lead-based contamination is not an area of concern. The site investigation revealed no evidence of conditions indicative of release or threatened releases of hazardous substances.

333 W. Alondra Boulevard (AIN 6160-006-002): Chemicals observed on site were limited to small quantities of household cleaning supplies and were stored correctly. The property was not identified in any of the standard environmental records sources within the EDR regulatory database. However, the assessment of this property revealed evidence of conditions indicative of RECs from the existing car wash located directly west of this property. Further investigation of this property may be needed. Based on the known or probably original construction date for the structure on the property (1964), it is likely that ACMs and LBP are present in building materials.

339 W. Alondra Boulevard (AIN 6160-006-001): Chemicals observed on site were limited to small quantities of household cleaning supplies and were stored correctly. Evidence of two former hydraulic lifts that were removed from the property was observed in the garage area of the building during the site inspection. There was no report of whether these lifts were investigated for releases of hydraulic fluid when they were removed. This is considered to be an REC. Industrial wastewater from the on-site car washing operations were observed to be generated on the property during the site inspection. The wastewater is directed to a 3-stage clarifier, then discharged into the Los Angeles County Sanitation District system. A past occupant of the property (George Hayes) was identified in the regulatory database as a CA LOS ANGELES CO. HMS (a database of County industrial waste and underground storage tank sites) for having an industrial waste discharge permitted by the LADPW. This is considered to be an REC.

According to files reviewed on the LADPW website, a total of seven USTs were removed from the property on May 2, 1990: one 280-gallon UST containing waste oil, three 1,000-gallon USTs containing unreported

petroleum products, two 5,000- gallon USTs containing gasoline, and one 8,000-gallon UST containing gasoline. No discolored soils or odors were evident during excavation of the USTs. A total of 10 soil samples were collected from a depth of 2 feet below the base of the USTs and selectively analyzed. Although no evidence of releases was identified when the USTs were removed from the property based on the 1992 investigation report, there were various deficiencies in the investigation relative to current accepted practices. For example, there was no discussion as to whether the product piping was removed; there were apparently no samples collected beneath the piping and fuel dispenser locations; and some analyses that would be required today were not performed. In addition, there are other potential issues related to automotive facilities that are unknown about the former facilities, such as separators, drains, and other such features. Furthermore, no records reviewed provided information about the removal or testing of soils in areas where earlier generations of fuel USTs might have been located. Therefore, based on review of the available data and current regulatory standards, the former service stations' operations are considered to be RECs.

No aboveground storage tanks (ASTs) or evidence of USTs, such as fill ports, vent pipes, patched asphalt or concrete, etc. was observed on the property during the site inspection. According to city directories and the EDR Hist. Auto database,³³ various gasoline service stations, general automotive repair shops, and car wash facilities have occupied the commercial structures on the property since the time of their construction, including Doc's Mobil Service (1960), Crain Tom Mobil (1962), Fred Mason (1969–1970), Ultra Tune (1982–1988), Rob's Hand Car Wash (1995), George Hayes (2001), and Estrella Car Wash" (2014). The property was not identified in the regulatory databases as a UST or leaking underground storage tank (LUST) facility.

The property was identified twice in the regulatory databases. George Hayes (339 W. Alondra Boulevard) was identified as a CA LOS ANGELES CO. HMS for having an industrial waste discharge permitted by the LADPW, and Tom Crain Mobil (341 W. Alondra Boulevard) was identified as an EDR Hist. Auto site for being occupied by various gasoline service stations and general automotive repair shops, including Crain Tom Mobil (1962), Mason Fred (1969–1970), and Ultra Tune (1982–1988).

Based on the known or probable original construction date for the structure on the property (1964), it is likely that ACMs and LBP are present in building materials. The assessment of this property revealed evidence of conditions indicative of RECs, and further investigation is recommended.

33 EDR has searched selected national collections of businesses directories and has collected listing of potential gas station/filling station/service station sites that were available to EDR researchers. EDR's review was limited to those categories of sources that might, in EDR's opinion, include gas station/filling station/service station establishments. This database falls within a category of information EDR classifies as 'High Risk Historical Records.'

Phase II Environmental Site Assessments

A Phase II ESA was conducted on December 19 and 20, 2017, on the parcel occupied by the car wash (339 W. Alondra Boulevard, AIN 6160-006-001) to verify or confirm the existence or nonexistence of hazardous materials based on the Phase I ESA. Based on the results from the investigation, SCS Engineers concluded the following for this site:

- No metal impacts to shallow soils at the property were identified.
- Total petroleum hydrocarbons (TPH) and VOCs were detected in soil samples at locations across the property. With few exceptions, the concentrations were low and do not represent a significant risk to human health or the environment. The results suggest a release from one or more gasoline USTs removed from the southwestern portion of the site may have occurred. TPH-G and fuel-related VOCs detected 15 to 20 feet below ground surface at boring B6 may represent a potential risk to groundwater and/or a risk to human health in the event of dermal contact or ingestion. Benzene was also detected at concentrations slightly above its screening level in samples from near one of the former pump islands (the 8-foot sample from boring B2) and near the former clarifier (10-foot samples from borings B18 and B19).³⁴
- Benzene, toluene, ethylbenzenes, and xylenes were detected in soil vapor samples across the property. The vapor concentrations were generally below or near recommended soil vapor screening levels, depending on the presumed future development scenario.

Based on the findings of the Phase II ESA, additional soils investigation is recommended to define the vertical extent of fuel-related constituents in soil and assess the threat to groundwater.

d. Database Searches

Government Code Section 65962.5 requires CalEPA to compile, maintain, and update specified lists of hazardous material release sites. CEQA (PRC Section 21092.6) requires a lead agency to consult the lists compiled pursuant to Government Code Section 65962.5 to determine whether the lead agency's project and any project alternatives are identified on any of the lists. EDC Section 17213(a)(2) requires a school district to determine that a property to be purchased or built upon is not a hazardous substance release site identified by the DTSC in a current list adopted pursuant to HSC Section 25356 for removal or remedial action.

Federal, State, local, and proprietary databases for hazardous sites are routinely researched during performance of a Phase I ESA to determine if a proposed project site is listed in the database, or whether hazardous sites are present within prescribed distances from the project site. Several private companies

34 SCS Engineers, *Soil and Soil Vapor Investigation Report: El Patron Car Wash 339 West Compton, California 90220 (APN 6160-006-001)* (January 18, 2018).

provide comprehensive database services that comply with ASTM standards to make such research time efficient and cost effective. Preparation of a Phase I ESA will ensure that the regulatory obligations for the identification of hazardous material release sites are met for a given project.

The following websites contain databases to assess environmental conditions near the as part of the preliminary screening evaluation:

- USEPA NPL (National Priorities List). NPL lists all sites under the USEPA's Superfund program, which was established under CERCLA to fund cleanup of contaminated sites that pose risk to human health and the environment.³⁵
- USEPA CERCLIS (Comprehensive Environmental Response, Compensation, and Liability Information System) and Archived Sites. CERCLIS contains 15,000 sites nationally identified as hazardous sites. This also involved a review for archived sites that have been removed from CERCLIS due to No Further Remedial Action Planned (NFRAP) status.³⁶
- USEPA RCRIS or RCRAInfo (Resource Conservation and Recovery Act Information System). RCRIS is a national inventory system about hazardous waste handlers. Generators, transporters, handlers, and disposers of hazardous waste are required to provide information for this database.³⁷
- DTSC Cortese List. The DTSC maintains the Hazardous Waste and Substances Sites (Cortese) List as a planning document for use by State and local agencies to comply with the CEQA requirements in providing information about the location of hazardous materials release sites. This list includes the Site Mitigation and Brownfields Reuse Program Database (CalSites).³⁸

The required lists of hazardous material release sites are commonly referred to as the Cortese List after the legislator who authored the legislation. Because the statute was enacted more than 20 years ago, some of the provisions refer to agency activities that were conducted many years ago and are no longer being implemented; in some cases, the information to be included in the Cortese List does not exist. Those requesting a copy of the Cortese List are now referred directly to the appropriate information resources on websites hosted by the boards or departments referenced in the statute, including DTSC's online EnviroStor database and the State Water Resources Control Board's (SWRCB) online GeoTracker database.³⁹

35 USEPA, "Superfund: National Priorities List (NPL)," <https://www.epa.gov/superfund/superfund-national-priorities-list-npl>.

36 USEPA, "Search Superfund Site Information," SEMS database, <https://cumulis.epa.gov/supercpad/CurSites/srchsites.cfm>.

37 USEPA, Envirofacts, RCRAInfo, <https://www3.epa.gov/enviro/facts/rcrainfo/search.html>.

38 DTSC, "DTSC's Hazardous Waste and Substances Site List—Site Cleanup (Cortese List)" (2010) http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm.

39 CalEPA, "Cortese List Data Resources," accessed on March 23, 2018, <https://calepa.ca.gov/SiteCleanup/CorteseList/>.

- CA HAZNET. DTSC uses this database to track hazardous waste shipments as required by RCRA.⁴⁰
- SWRCB LUSTIS (Leaking Underground Storage Tank Information System). The SWRCB maintains an inventory of USTs and LUSTs that tracks unauthorized releases.⁴¹
- EnviroStor database. Maintained by the DTSC, EnviroStor identifies sites that have known contamination or sites for which there may be reasons to investigate further. The database includes federal Superfund sites (National Priorities List), State response sites, voluntary cleanup sites, school investigation and cleanup sites, corrective action sites, and tiered California permit sites. It also includes sites that are being investigated for suspected but unconfirmed contamination.

Information from the Phase I ESA completed for the school site indicates that the following have been identified:

- For the existing high school campus, four sites located at 601 S Acacia Avenue are found on DTSC's HAZNET database.

The CHS campus was identified on the CA HAZNET database,⁴² as an RCRA SQG, on the FINDS database, and on the ECHO database.⁴³ Wastes manifested at the existing CHS campus included other organic solids, laboratory wastes chemicals, unspecified aqueous solution, empty containers less than 30 gallons in volume, asbestos-containing wastes, PCBs, and material containing PCBs. No violations were noted.

Information taken from each Phase I ESA for the acquisition parcels indicates that the following have been identified:

- Asbestos-containing waste was located at 327–329 W Alondra Boulevard as part of LA County's UST Program.⁴⁴ The church parking lot located at 329 W. Alondra Boulevard was identified in the EDR regulatory data base report as a CA HAZNET site based on data from hazardous waste manifests for disposal of asbestos-containing wastes in 1994. This may be associated with the demolition of the residential structure that had been located on the property.
- The industrial waste discharge permitted by the LADPW located at 339 W. Alondra Boulevard was identified as a CA LOS ANGELES CO. HMS for having an industrial waste discharge permitted by the LADPW.⁴⁵

40 DTSC, Hazardous Waste Manifests, <http://www.hwts.dtsc.ca.gov/>.

41 SWRCB, Data and Databases, <https://www.waterboards.ca.gov/losangeles/resources/databases/>.

42 DTSC, Hazardous Waste Manifest Information.

43 USEPA, *Enforcement and Compliance History Online*.

44 SCS Engineers, *Phase I ESA for 301–339 West Alondra Boulevard* (December 21, 2017).

45 SCS Engineers, *Phase I ESA for 339 West Alondra Boulevard* (December 21, 2017).

According to the Phase I reports,⁴⁶ 30 additional mapped sites are listed on various databases, as shown on **Table 4.8-1: Hazardous Waste Sites within 2,000 Feet of the Project Site**. These include several gas stations, a dry cleaner (526 W. Alondra Boulevard), two fire stations (201 S. Acacia Avenue and 220 W. Alondra Boulevard), a police station (301 S. Willowbrook Avenue), a courthouse building (200 W. Compton Boulevard), a municipal transportation facility, a school (604 S. Tamarind Avenue), a District transportation facility (723 S Alameda Street), a shopping center (247 W. Alondra Boulevard), and vacant lots.

⁴⁶ Converse Consultants, *Phase I ESA Report*.

Table 4.8-1
Hazardous Waste Sites within 2,000 Feet of the Project Site

Address	Distance and Direction from Project Site	Land Use	Database listings	Description
101 W Compton Boulevard	1564 feet NE	Gas station	CA LUST, CA ENF, CA HIST CORTESE	LUST Cleanup site; potential gasoline; tank closure
200 W Compton Boulevard	727 feet NE	Court house	CA AST	No information
200 W Compton Boulevard	727 feet, NE	Court house	CA HIST UST	Tank containing diesel; stock inventor
200 W Compton Boulevard	825 feet NE	Court house	CA HIST UST, CA HAZNET, CA LOS ANGELES CO. HMS	Asbestos-containing waste
201 S Acacia Avenue	984 feet N	Fire station	CA HIST UST	GeoTracker indicates no reported leaks
201 S Acacia Avenue	1140 feet N	Fire station	CA LUST, CA SWEEPS UST, CA FID UST, CA HAZNET	LUST Cleanup site; open remediation
201 S Acacia Avenue	1140 feet N	Fire station	CA ENF, CA HIST CORTESE	USTs
220 W Alondra Boulevard	148 feet SE	Fire station	CA UST	Permitted by LAFD
220 W Alondra Boulevard	148 feet SE	Fire station	CA LUST, CA LOS ANGELES Co. HMS	LUST cleanup site; open site assessment
220 W Alondra Boulevard	148 feet SE	Fire station	EDR Hist. Auto	History of gas station and repair
247 W Alondra Boulevard	1837 feet E	Shopping Center	CA SLIC	VOCs found
301 S Willowbrook Avenue	920 feet NE	Police station	CA UST	Asbestos-containing waste
301 S Willowbrook Avenue	1089 feet NE	Police station	CA HIST UST, CA HAZNET	Asbestos-containing waste
301 S Willowbrook Avenue	1089 feet NE	Police station	CA LUST, CA SWEEPS UST, CA FID UST, CA CHMIRS	LUST cleanup site; case closed
301 S Willowbrook Avenue	1089 feet NE	Police station	CA HIST UST	Tank containing unleaded gas; no reported leaks
301 S Willowbrook Avenue	1089 feet NE	Police station	CA UST	Permitted by LAFD
330 W Alondra Boulevard	107 feet SW	Repair shop	EDR Hist. Auto	History of repair shops
341 W Alondra Boulevard	17 feet SE	Gas station	EDR Hist. Auto	History of gas station and repair shop

Address	Distance and Direction from Project Site	Land Use	Database listings	Description
390 W Compton Boulevard	1160 feet N	Gas station	CA SWEEPS UST, CA LOS ANGELES CO. HMS	Removed facility
390 W Compton Boulevard	1160 feet N	Gas station	CA UST, CA LOS ANGELES CO. HMS	Permitted by LAFD
413/415 W Compton Boulevard	1242 feet NW	Vacant lot	US BROWNFIELDS, FINDS	Soil contaminated by toluene
413/415 W Compton Boulevard	1254 feet NW	Vacant lot	CA ENVIROSTOR	Soil contamination; history of evaluation
429 S Oleander Avenue	40 feet NW	Municipal transportation facility	CA HIST UST	Tank containing unleaded gasoline; no leak reported
526 W Alondra Boulevard	889 feet SW	Dry Cleaner	CA DRYCLEANERS	History of dry cleaning; inactive as of June 2016
548 S Center Avenue	538 feet NW	Gas station	EDR Hist. Auto	History of gas station
604 S Tamarind Avenue	1412 feet E	School	CA ENVIROSTOR, CA SCH	History of cleanup; potential for cadmium and compounds
723 S Alameda Street	1980 feet E	School district transportation facility	CA LUST, CA LOS ANGELES CO. HMS	LUST cleanup site; case closed
803 W Alondra Boulevard	1993 feet SW	Gas station	CA LUST	LUST cleanup site, case closed
803 W Alondra Boulevard	1993 feet SW	Gas station	CA HIST CORTESE	No information
900 S Acacia Avenue	215 feet SE	Gas station	EDR Hist. Auto	History of gas and oil service

Sources: *Converse Consultants, Phase I Environmental Site Assessment Report, Compton High School 601 S. Acacia Avenue, Compton, California (January 3, 2018); and SCS Engineers, Phase I Environmental Site Assessment for 301-339 West Alondra Boulevard (December 21, 2017).*

Notes: N=North, S=South, E= East, W= West, S=South, NE=Northeast, NW= Northwest, SW= Southwest, SE=Southeast.

ENVIRONMENTAL IMPACTS

Methodology

To evaluate potential impacts, existing and proposed on-site hazards were identified and compared against the established safety standards and regulations to determine if the proposed Project would result in impacts related to hazardous materials. The analysis of the potential impacts regarding hazardous materials management was based on site evaluations, plans and operational information provided by the Compton USD.

Thresholds of Significance

The following thresholds for determining the significance of impacts related to hazards and hazardous materials are contained in the environmental checklist form contained in Appendix G of the CEQA Statutes and Guidelines. Impacts related to hazards and hazardous materials are considered significant if the proposed Project would:

- Threshold HAZ-1:** 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.
- Threshold HAZ-2:** Create an air quality hazard due to the placement of a school within one-quarter mile of: (a) permitted and nonpermitted facilities identified by the jurisdictional air quality control board or air pollution control district; (b) freeways and other busy traffic corridors; (c) large agricultural operations; and/or (d) a rail yard, which might reasonably be anticipated to emit hazardous air emissions, or handle hazardous or acutely hazardous material, substances, or waste.
- Threshold HAZ-3:** Be less than the following distances from the edge of respective power line easements: (1) 100 feet of a 50–133 kV line; (2) 150 feet of a 220–230 kV line; or (3) 350 feet of a 500–550 kV line.
- Threshold HAZ-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.
- Threshold HAZ-5:** Contain a current or former hazardous waste disposal site or solid waste disposal site and, if so, have the wastes been removed.
- Threshold HAZ-6:** Be located on a site containing or underlain by naturally occurring hazardous materials.

- Threshold HAZ-7:** Situated within 1,500 feet of an aboveground water or fuel storage tank.
- Threshold HAZ-8:** Situated within 2,000 feet of a significant disposal of hazardous waste.
- Threshold HAZ-9:** Is the Project Site a hazardous substance release site identified by the state Department of Health Services in a current list adopted pursuant to §25356 for removal or remedial action pursuant to Chapter 6.8 of Division 20 of the Health and Safety Code.
- Threshold HAZ-10:** If prepared, has the risk assessment been performed with a focus on children's health posed by a hazardous materials release or threatened release, or the presence of naturally occurring hazardous materials on the school site.
- Threshold HAZ-11:** If a response action is necessary and proposed as part of this project, has it been developed to be protective of children's health, with an ample margin of safety.
- Threshold HAZ-12:** Situated within 1,500 feet of a railroad track easement.

Please refer to **Section 6.1: Effects Found Not to Be Significant** for an evaluation of topics that were determined to be less than significant or have no impact and do not require further analysis in the EIR.

Project Impact Analysis

- Threshold HAZ-1:** 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.

School Site

Construction

Construction activities on the existing high school campus would also involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. However, all potentially hazardous materials would be used and stored in compliance with applicable federal, State, and local regulations. Additionally, the CFD would have the authority to perform inspections and enforce federal and State laws governing the storage, use, transport, and disposal of hazardous materials and wastes.

Operation

Operation on the site would not create a hazard through upset or accident conditions involving hazardous materials. The types and amounts of hazardous materials that would be used in connection with the

proposed Project would be typical of those used on high school campuses (e.g., cleaning solutions, solvents, landscaping pesticides, painting supplies, and petroleum products).

All materials and substances would be subject to applicable health and safety requirements. This would include affixing appropriate warning signs and labels; installing emergency wash areas; providing well-ventilated areas and special plumbing; and maintaining adult supervision. Compliance with existing regulations would result in no reasonably foreseeable upset or accident conditions that would create a significant hazard to the public due to the release of hazardous materials during construction.

Impacts would be less than significant.

Acquisition Parcels

Construction

Construction activities, including demolition, of the proposed Project would also involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. However, all potentially hazardous materials would be used and stored in compliance with applicable federal, State, and local regulations. Additionally, the CFD would have the authority to perform inspections and enforce federal and State laws governing the storage, use, transport, and disposal of hazardous materials and wastes.

Impacts would be less than significant.

Threshold HAZ-2: Create an air quality hazard due to the placement of a school within one-quarter mile of: (a) permitted and nonpermitted facilities identified by the jurisdictional air quality control board or air pollution control district; (b) freeways and other busy traffic corridors; (c) large agricultural operations; and/or (d) a rail yard, which might reasonably be anticipated to emit hazardous air emissions, or handle hazardous or acutely hazardous material, substances, or waste.

(a) Permitted and Nonpermitted Facilities Identified by the Jurisdictional Air Quality Control Board or Air Pollution Control District

As part of the environmental review, an Air Toxics Health Risk Assessment (HRA) (see **Appendix D**) has been prepared to address specific requirements of both CDE and the California Environmental Quality Act (CEQA) to evaluate whether facilities have the potential for generating hazardous and acutely hazardous air emissions within a quarter-mile (1,320 feet) radius of the Project Site.

An area reconnaissance was conducted within a quarter-mile radius of the proposed site to identify facilities/process operations as well as mobile and stationary sources that have the potential to emit air contaminants. The site is not located within 500 feet of a freeway or busy traffic corridor (fewer than 100,000 Average Annual Daily Traffic). Therefore, an assessment of both short- and long-term exposures from on-road mobile source activity was not performed. The reconnaissance included 42 sites within a quarter-mile radius which included both active and inactive facilities. A total of 42 sites were identified within one quarter mile. Facility information provided by business owners/operators and data collected from the USEPA, CalEPA, and SCAQMD were reviewed to assist in the identification of potential emitters. An on-site reconnaissance was then conducted verify both active and inactive facilities. Based on the site survey and records review, the following active sources were verified to potentially emit hazardous air emissions:

- Sr. Cliff's Texas Style Burritos, 408 W. Alondra Boulevard, Compton, CA
- Mom's Burgers, 336 W. Alondra Boulevard, Compton, CA
- Rush Burger 107. E. Alondra Boulevard, Compton, CA
- Alondra Oil Inc., 220 W. Alondra Boulevard, Compton, CA
- Galindo's Cleaners, 526 W. Alondra Boulevard, Compton, CA
- Ace Fuels Inc., 390 W. Compton Boulevard, Compton, CA
- Los Angeles County Sheriff's Dept. Facilities Services Bureau, 301 S. Willowbrook Avenue, Compton, CA

A 40-year exposure scenario was assessed to identify lifetime health risk values for future staff from each of the sites with respect to the proposed Project. A 4-year exposure scenario was also assessed to identify the health risk values associated with the average student attending the high school in grades 9 through 12. Both scenarios assess potential cancer (carcinogenic) and noncancer (noncarcinogenic) effects from contaminant exposures.

For carcinogenic exposures, the summation of risk totaled 1.1 in 100,000 (1.1E-05) for adults (faculty and staff); this exceeds the established a threshold of 1 in 100,000 (1.0E-05) for long-term exposure (40-years) for faculty and staff. The risk factor for students is calculated to be 8.4 in 10,000,000 (8.4E-07) for a 4-year exposure (and does not exceed the significance threshold of threshold of 1 in 100,000 (1.0E-05).

For noncarcinogenic effects, the hazard index identified for respiratory, kidney, and eye target organs totaled less than 1 both faculty and staff, and students (9.4E-01 for respiratory system, 5.6E-02 for kidneys and 2.3E-01 for eye irritation and other effects). As such, the noncarcinogenic effects risk are considered to be within acceptable limits.

Available information collected during the source identification process (e.g., regulatory records review and on-site interviews with business owners/operators) did not reveal the presence of a regulated substance that may present an acute hazard from a process upset and/or accidental release.

Hazardous and/or acutely hazardous air emissions generated from the seven identified facilities within a quarter-mile radius are within the acceptable risk levels and will not pose an actual or potential endangerment to persons (faculty, staff and students) who attend or work at the proposed school.

As noted above, the HRA found that the summation of risk totals of 1.1 in 100,000 (1.1E-05) for adults (faculty and staff) exceeds the established threshold of 1 in 100,000 (1.0E-05) for long-term exposure (40 years) for faculty and staff. However, the risk factor for students is calculated to be 8.4 in 10,000,000 (8.4E-07) for a 4-year exposure, which does not exceed the significance threshold of threshold of 1 in 100,000 (1.0E-05).

Impacts for long-term exposure for faculty and staff would be potentially significant, while impacts to students would be less than significant.

(b) Freeways and Other Busy Traffic Corridors

No freeways are located within one-quarter mile of the proposed Project.

Upon implementation of the proposed Project the operational CHS campus would front W. Alondra Boulevard. EDC Section 17213 states that a busy traffic corridor is defined as having 50,000 or more average daily trips (ADT) in a rural area or 100,000 or more ADT in an urban area.⁴⁷ Currently designated by the City as a Major Highway, Alondra Boulevard is major east–west corridor that also serves as a designated truck route within the area.⁴⁸ This roadway segment contains the highest roadway ADT in the Project vicinity analyzed in the Traffic Study, along with Rosecrans Avenue (see **Appendix O** and **Appendix N** for the roadway noise modeling); therefore, the other roadway segments have fewer than 50,000 or more ADT in a rural area, or 100,000 or more ADT in an urban area.⁴⁹

Impacts would be less than significant.

47 EDC Section 17213,

https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=EDC§ionNum=17213.

48 City of Compton, *General Plan*, “Noise Element” (December 3, 1991).

49 The traffic counts for intersections 6 and 8 of the Traffic Study (**Appendix O**) were used to determine ADT and to calculate roadway noise (see **Appendix N** for noise calculations).

(c) Large Agricultural Operations

No large agricultural operations are within a quarter mile of the Project Site because surrounding land uses include residential, commercial, retail, and industrial uses.

No impacts would occur.

(d) A Rail Yard, Which Might Reasonably be Anticipated to Emit Hazardous Air Emissions, or Handle Hazardous or Acutely Hazardous Material, Substances, or Waste

There are no rail yards within one-quarter mile of the proposed Project.

Per CCR Section 14010(d), if a proposed site is within 1,500 feet of a railroad track easement, a safety study shall be done by a competent professional to assess potential rail safety hazards. The closest train, the Metro Blue Line, located approximately 670 feet east of the Project Site, does not carry any hazardous materials. As shown in the Rail Safety Study (see **Appendix M**), the potential for a railyard or train to emit any hazardous material would be very low. Limiting factors would be the distance to the Project Site—approximately 670 feet east—and meteorological factors that shows the wind is less persistent in the direction of the Metro Blue Line to the Project Site than from other directions. In addition to the probability analysis for a hazardous release, there is a relatively long predicted recurrence interval (238,000 years). Based on these mitigating factors, the probability that a hazardous material release would impact the high school—even if such materials were ever transported along the Metro Blue Line—is no greater than 2.95×10^{-4} at the Project Site boundary, based on the above discussion of extenuating factors.

No impacts would occur.

Threshold HAZ-3: Be less than the following distances from the edge of respective power line easements: (1) 100 feet of a 50–133 kV line; (2) 150 feet of a 220–230 kV line; or (3) 350 feet of a 500–550 kV line.

Per CCR Section 14010(c), there are 4 kV transmission power lines along S. Oleander Avenue (passing north–south through the central portion of the site) and W. Cocoa Street (adjacent to south of the site). There are 16 kV transmission power lines along W. Myrrh Street (adjacent to the north of the site), along

S. Oleander Avenue (passing north–south through the central portion of the site), and along the west site boundary all within 100 feet.

The Compton Substation is greater than 350 feet from the Project Site and has less than 92 kV.⁵⁰ There were no other transmission lines were found; therefore, no power transmission line contains 5–133 kV within 100 feet, 220–230 kV within 150 feet, or 500–550 kV within 350 feet of the Project Site.

Impacts would be less than significant.

Threshold HAZ-4: Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 [inclusive of Section 25356 of the Health & Safety Code] and, as a result, would it create a significant hazard to the public or the environment.

School Site

The existing campus is located on a site that is included on a list of hazardous materials pursuant to Government Code 65962.5, which is the Hazardous Waste and Substances (Cortese) List.⁵¹ A review of the Cortese List compiled on the DTSC, the SWRCB, and CalEPA conducted as part of the Phase I ESA notes that 601 S Acacia Avenue is on the CA HAZNET database.⁵² The site is listed for hazardous waste storage and transfer, and for asbestos-containing waste.

Prior to the issuance of a building permit, the proposed Project Site and any RECs must be remediated to the standards put forth by the DTSC. The risk evaluation and any required response actions would be a condition of approval for construction, demolition, or grading permits, and would be subject to review and/or approval by regulatory oversight agencies. These agencies could also require additional site investigation to more fully delineate the extent of contaminants of concern at the site. If extensive on-site excavation and/or soil off-haul is determined to be the appropriate response action for a site, additional CEQA review may be required to evaluate potential impacts for the response related to air quality, noise, and traffic.

With compliance with DTSC requirements, impacts would be less than significant.

50 California Energy Commission, *California Transmission Lines—Substations Enlargement Maps*, http://www.energy.ca.gov/maps/infrastructure/3P_Enlg.pdf.

51 California State Water Resources Control Board (SWRCB), *GeoTracker* (2015), database, accessed February 12, 2018, <https://geotracker.waterboards.ca.gov/map/>.

52 Converse Consultants, *Phase I ESA Report*.

Acquisition Parcels

For the acquisition parcels, the following sites are noted as being identified on a list of hazardous materials pursuant to Government Code 65962.5, which is the Hazardous Waste and Substances (Cortese) List:⁵³

- The asbestos-containing waste located at 327–329 W Alondra Boulevard is part of LA County’s UST program.⁵⁴ The church parking lot located at 329 W. Alondra Boulevard was identified in the EDR regulatory data base report as a CA HAZNET site based on data from hazardous waste manifests for disposal of asbestos-containing wastes in 1994. This may be associated with the demolition of the residential structure that had been located on the property.
- The industrial waste discharge permitted by the LADPW located at 339 W Alondra Boulevard was identified as a CA LOS ANGELES CO. HMS for having an industrial waste discharge permitted by the LADPW.⁵⁵

A gas station (Tom Crain Mobil) located at 341 W. Alondra Boulevard was identified as an EDR Hist. Auto site. This parcel was previously occupied by various gasoline service stations and general automotive repair shops, including Crain Tom Mobil (1962), Mason Fred (1969–1970), and Ultra Tune (1982–1988). In addition, the Phase II ESA recommends additional soil investigation to define the vertical extent of fuel-related constituents in soil and assess the threat to groundwater. Depending on the nature of the future development on the former car wash, additional consideration and investigation of the potential for vapor intrusion may be warranted.

Under EDC Section 17213(a)(1), the District is prohibited from acquiring any current or former hazardous waste disposal site or solid waste disposal site unless the site is a former solid waste disposal site and the wastes have been removed. The proposed Project Site and any RECs must be cleaned to the standards put forth by the DTSC. The risk evaluation and any required response actions would be a condition of approval for construction, demolition, or grading permits and would be subject to review and/or approval by regulatory oversight agencies. These agencies could also require additional site investigation to more fully delineate the extent of contaminants of concern at the site. If extensive on-site excavation and/or soil off-haul is determined to be the appropriate response action for a site, additional CEQA review may be required to evaluate potential impacts for the response related to air quality, noise, and traffic.

With regulatory compliance, impacts would be less than significant.

53 SWRCB, *GeoTracker*.

54 SCS Engineers, *Phase I ESA for 301–339 West Alondra Boulevard*.

55 SCS Engineers, *Phase I ESA for 339 West Alondra Boulevard*.

Threshold HAZ-5: Contain a current or former hazardous waste disposal site or solid waste disposal site and, if so, have the wastes been removed.

School Site

As shown in the Phase I ESA, the existing high school campus was identified on the CA HAZNET database, as an RCRA SQG, on the FINDS database, and on the ECHO database. Wastes manifested at the property included other organic solids, laboratory wastes chemicals, unspecified aqueous solution, empty containers less than 30 gallons in volume, asbestos-containing wastes, PCBs and material containing PCBs. However, no violations were noted. Based on the wastes being manifested and lack of violations, these listings are not expected to represent an environmental concern to the Property. The parking lot property was identified in the EDR regulatory data base report as a CA HAZNET site based on data from hazardous waste manifests for disposal of asbestos-containing wastes in 1994.

Per CCR Section 14010(h), the existing campus contains multiple RECs that may contain former hazardous waste disposal sites. These include the former manual arts building on the existing campus, which included the former machine, auto repair, and carpentry shops, and the car wash site located at 339 W. Alondra Boulevard.⁵⁶ The existing CHS campus also has a UST, two hydraulic elevators located in the administration building, and an old water well that could become potentially hazardous if not removed or if removed incorrectly.

Furthermore, based on the construction date for the buildings located on the existing high school, it is likely that ACMs and LBP are present in building materials. Additionally, there is a potential presence of LBP residue in the shallow soils at the property, as well as termiticides around the foundations.⁵⁷

Proper removal and off-site disposal of the UST and the two hydraulic elevators, located in the existing administration building, is required. Additionally, the on-site water well should be abandoned properly if not in use. Prior to demolition, any structures potentially containing asbestos or LBP should be inspected. If ACMs and/or LBP is found, removal should be implemented under DTSC standards.

With regulatory compliance, impacts would be less than significant.

⁵⁶ Converse Consultants, *Phase I ESA Report*.

⁵⁷ Converse Consultants, *Phase I ESA Report*.

Acquisition Parcels

As shown in **Appendix L**, the church site located at 333 W. Alondra Boulevard may have become contaminated from the car wash that is located directly west at 339 W. Alondra Boulevard.⁵⁸

The existing car wash site at 339 W. Alondra Boulevard has evidence of two former hydraulic lifts that were removed from the property and were observed in the garage area of the building. Industrial wastewaters from the on-site car washing operations were observed to be generated on the property. Additionally, as described above and per CCR Section 14010(h), a total of seven USTs were removed from the property on May 2, 1990. Although no evidence of releases was identified when the USTs were removed from the property based on the 1992 investigation report, there were various deficiencies in the investigation relative to current accepted practices.⁵⁹

Based on the construction date for the buildings located 327–329 W Alondra Boulevard, it is likely that ACMs and LBP are present in building materials. Additionally, there is a potential presence of LBP residue in the shallow soils at the property, as well as termiticides around the foundations.⁶⁰

Under EDC Section 17213(a), the District is prohibited from acquiring any current or former hazardous waste disposal site or solid waste disposal site unless the site is a former solid waste disposal site and the wastes have been removed; any hazardous substance release site identified by DTSC in a current list adopted under HSC Section 25356 for a removal or remedial action pursuant to HSC Sections 25300, et seq.; or any site containing pipelines carrying hazardous substances or hazardous wastes, unless the pipeline is a natural gas line used only to supply natural gas to the school or neighborhood.

Prior to demolition, any structures potentially containing asbestos or LBP should be inspected. If asbestos and/or LBP is found, removal should be implemented under the DTSC standards.

With regulatory compliance, impacts would be less than significant.

58 SCS Engineers, *Phase 1 ESA Greater True Light Baptist Church 333 West Alondra Boulevard, Compton, California 90220 (APN 6160-006-002)* (December 21, 2017); and SCS Engineers, *Phase 1 ESA El Patron Car Wash 339 West Alondra Boulevard, Compton, California 90220 (APN 6160-006-001)* (December 21, 2017).

59 SCS Engineers, *Phase 1 ESA El Patron Car Wash 339 West Alondra Boulevard, Compton, California 90220 (APN 6160-006-001)*.

60 SCS Engineers, *ESA for 301–339 West Alondra Boulevard*.

Threshold HAZ-6: Be located on a site containing or underlain by naturally occurring hazardous materials.

School Site

Phase I ESA was conducted for the existing high school campus. No known naturally occurring hazardous materials are located on the proposed Project Site. Therefore, no impacts would occur.

If contaminated soil or groundwater were discovered, it would be removed/remediated to the satisfaction of the District and/or the DTSC. The removal or remedial action would be conducted in accordance with federal and State requirements governing hazardous materials excavation, on-site handling, and off-site transport to minimize potential exposures to construction workers and the public. The procedures required by the EDC and CCR for investigating, assessing and remediating hazardous materials are outlined above. Once the Project has been granted environmental clearance, additional discoveries of contamination during construction are not anticipated, but could occur. If hazardous materials or contaminated soil were encountered during construction, the contractor would stop work and immediately notify the District. The District would arrange for an environmental assessment to determine the nature and extent of the contamination and the type of remediation that would be required. Potential remedial measures could include but are not necessarily limited to excavation and off-site disposal, excavation and on-site treatment, or in-situ treatment. These activities would be performed in accordance with all applicable federal, State, and local laws and regulations pertaining to notification, environmental investigation, and cleanup.

In the event that a previously unknown UST were discovered, it would be left in place and cordoned off, and work in the vicinity of the UST would cease immediately. The contractor would notify the District, who in turn would notify the local CUPA in charge of UST programs.⁶¹ The UST would be registered, and a permit would be obtained for its removal. Once the UST was removed, soil samples would be collected under agency oversight to determine whether there had been a release of the tank's contents. If a release were identified, it would be remediated under CUPA, DTSC, and/or Los Angeles RWQCB oversight, as appropriate. These activities would continue until a "no further action" letter had been received from the responsible agency. Other potentially hazardous buried features discovered during construction, such as hydraulic hoists, seepage pits, clarifiers, and sumps would be similarly investigated and remediated,

61 The Los Angeles City Fire Department is the CUPA responsible for UST programs in the City of Los Angeles. Other CUPAs, including the Los Angeles County Department of Public Works, have jurisdiction for UST programs in areas outside Los Angeles City boundaries.

except that regulatory agency notification and oversight would not be required unless a reportable release was discovered or the agency was already involved in the Project.

In the event that contaminated soil, contaminated groundwater, or potentially hazardous subsurface features such as USTs were encountered, the construction schedule would be modified or delayed, thereby ensuring that construction would not inhibit further investigation and remedial activities and would not expose the public or construction workers to significant risks associated with hazardous conditions.

Compliance with federal and State regulations would reduce impacts associated with exposure to hazardous materials to less than significant.

Acquisition Parcels

As discussed previously, Phase I ESAs were conducted for each of the acquisition parcels. No known naturally occurring hazardous materials are located on the proposed Project Site. Therefore, no impacts would occur.

No impacts would occur.

Threshold HAZ-7: Situated within 1,500 feet aboveground water or fuel storage tank.

As shown in **Table 4.8-1**, an AST and fuel storage tanks are within 1,500 feet of the Project Site. The site is listed as the Compton Courts, which has a listing for an AST for petroleum storage, located at 200 W Compton Boulevard and is approximately 727 feet to the northeast. In addition, there are four sites listed as having fuel storage tanks, located at 429 S Oleander Avenue, 200 W Compton Boulevard, 301 S Willowbrook Avenue, and 201 S Acacia Avenue. The reports for these indicate no reporting of leaks, closed cases that have been completed, facilities that are permitted by LAFD. Implementation of the project would not create or exacerbate safety risks to these aboveground water or fuel storage tanks. Prior to the issuance of a building permit, the proposed Project Site and any RECs in the surrounding area must be cleaned to the standards put forth by the DTSC or other responsible regulatory agency. The risk evaluation and any required response actions would be a condition of approval for construction, demolition, or grading permits and would be subject to review and/or approval by regulatory oversight agencies.

With regulatory compliance, impacts would be less than significant.

Threshold HAZ-8: Situated within 2,000 feet of a significant disposal of hazardous waste.

The Phase I reports noted that 30 additional mapped sites on a Cortese-related database or other related database are within 2,000 feet.⁶² According to the EDR-provided review of the California Department of Resources Recycling and Recovery Solid Waste Information system, one active landfill was identified within 0.5 miles of the Property. This landfill is located at 458 S. Alameda Street, approximately 0.5 miles northeast of the Project Site and, therefore, is farther than 2,000 feet from the Project Site. In addition, this site has a limited volume-transfer operation that accepts construction/demolition, inert, and mixed municipal debris. Based on the distance and available information, it is unlikely this site has adversely affected the environmental condition of the Project Site.⁶³ Impacts would be less than significant.

Threshold HAZ-9: Is the Project Site a hazardous substance release site identified by the state Department of Health Services in a current list adopted pursuant to §25356 for removal or remedial action pursuant to Chapter 6.8 of Division 20 of the Health and Safety Code.

Under EDC Section 17213(a)(1), the District is prohibited from acquiring any current or former hazardous waste disposal site or solid waste disposal site unless the site is a former solid waste disposal site and the wastes have been removed. For each proposed project that involves new property acquisition, the District would consult specified comprehensive lists of contaminated sites, including the DTSC EnviroStor and SWRCB GeoTracker databases, to determine whether the proposed site is a current or former hazardous waste disposal site or solid waste disposal site. This review would be performed as part of the District's site assessment process, which would include the preparation of a Phase I ESA and, if necessary, a Phase II ESA/PEA.

Where a proposed school site is listed by DTSC under HSC Section 25356, the District would, through the site assessment and CEQA processes and under DTSC's oversight, undertake all required removal and/or remedial actions; ensure that DTSC removes the site from this listing; determine that the site as remediated poses no significant health risk to students, faculty, and staff; and secure DTSC's certification that all school buildings may be occupied and used for their intended purpose. The public would then have the opportunity to review the site-specific investigations through the public review process. Compliance with the process and steps outlined would ensure that impacts from any site used for a school project that DTSC formerly listed under HSC Section 25356 would not be a hazard to people on or near the site.

62 Converse Consultants, *Phase I ESA Report* (January 3, 2018).

63 SCS Engineers, *Phase 1 ESA El Patron Car Wash*.

If an EIR identifies significant contamination, school districts may elect to drop the proposed school site from consideration or clean up the contamination under a DTSC Voluntary Cleanup Agreement (VCA) or School Cleanup Agreement (SCA). An SCA is required for school districts planning to obtain final site or plan approval and full funding before completion of required response actions. Consistent with response actions conducted for other contaminated sites, DTSC follows HSC requirements for all responses actions (EDC Section 17210.1(a)(1) and (2) and Section 17213.2(a)).⁶⁴ DTSC is required to provide opportunities for public comment on the Removal Action Workplan or Remedial Action Plan before approval of the final document (HSC Division 20, Chapter 6.8, Section 25356.1(e) and (h)).⁶⁵ When all necessary cleanup activities are complete, DTSC will certify that no further action is needed and will also certify the site as safe for school construction or occupancy. The DTSC has issued numerous advisories and guidance specific to the investigation and cleanup of school sites. School projects conducted under DTSC oversight are required to follow the agency guidance, but school districts and others also may refer to the guidance documents when conducting self-directed environmental investigations and remedial activities.

Proposed School Site

Existing Campus

Information from the Phase I ESAs completed for the school site and the acquisition parcels indicates that the following have been identified.

- For the existing high school campus, four sites located at 601 S Acacia Avenue are found on DTSC's HAZNET database.

The CHS campus was identified on the CA HAZNET database,⁶⁶ as a RCRA SQG, on the FINDS database, and on the ECHO database.⁶⁷ Wastes manifested at the existing CHS campus included other organic solids, laboratory wastes chemicals, unspecified aqueous solution, empty containers less than 30 gallons in volume, asbestos-containing wastes, PCBs, and material containing PCBs. No violations were noted.

For the acquisition parcels, the following sites are noted:

- The asbestos-containing waste located at 327–329 W Alondra Boulevard is part of LA County's UST program.⁶⁸ The church parking lot located at 329 W. Alondra Boulevard was identified in the EDR regulatory data base report as a CA HAZNET site based on data from hazardous waste manifests for

64 EDC sec. 17210.

65 HSC Section 25356.1 (January 1, 2009).

66 DTSC, "Hazardous Waste Manifest Information."

67 USEPA, *Enforcement and Compliance History Online*.

68 SCS Engineers, *Phase I ESA for 301–339 West Alondra Boulevard* (December 21, 2017).

disposal of asbestos-containing wastes in 1994. This may be associated with the demolition of the residential structure that had been located on the property.

- The industrial waste discharge permitted by the LADPW was located at 339 W Alondra Boulevard (AIN 6160-006-001) was identified as a CA LOS ANGELES CO. HMS for having an industrial waste discharge permitted by the LADPW.⁶⁹
- A gas station (Tom Crain Mobil) located at 341 W. Alondra Boulevard was identified as an EDR Hist. Auto site. This parcel was previously occupied by various gasoline service stations and general automotive repair shops, including Crain Tom Mobil (1962), Mason Fred (1969–1970), and Ultra Tune (1982–1988). In addition, the Phase II ESA recommends additional soil investigation to define the vertical extent of fuel-related constituents in soil and assess the threat to groundwater. Further, and depending on the nature of the future development on the former car wash, additional consideration and investigation of the potential for vapor intrusion may be warranted.

Under EDC Section 17213(a), the District is prohibited from acquiring any current or former hazardous waste disposal site or solid waste disposal site unless the site is a former solid waste disposal site and the wastes have been removed; any hazardous substance release site identified by DTSC in a current list adopted under HSC Section 25356 for a removal or remedial action pursuant to HSC Sections 25300, et seq.

The Project would comply with regulatory requirements pursuant to DTSC standards for handling and remediation of RECs and proper detection and removal of any asbestos, LBP, and termiticides. The risk evaluation and any required response actions would be subject to review and/or approval by DTSC.

With regulatory compliance, impacts would be less than significant.

Asbestos-Containing Materials

Any activity that involves cutting, grinding, or drilling during building renovation or demolition, or that involves relocation of underground utilities, could release friable asbestos fibers unless proper precautions are taken. The federal Clean Air Act regulates asbestos as a hazardous air pollutant, which subjects it to regulation by the SCAQMD under its Rule 1403. Cal/OSHA also regulates asbestos as a potential worker safety hazard. As noted in the regulatory framework, the Asbestos-Containing Materials in Schools rule (40 CFR, Part 763, Subpart E),⁷⁰ promulgated under the federal AHERA, requires local education agencies to inspect their school buildings for asbestos-containing construction materials (ACCMs), prepare asbestos management plans, and perform asbestos response actions to prevent or

69 SCS Engineers, *Phase I ESA for 339 West Alondra Boulevard* (December 21, 2017).

70 Code of Federal Regulations, ch. 40, pt. 763—Asbestos, available at https://www.epa.gov/sites/production/files/documents/2003pt763_0.pdf.

reduce asbestos hazards. AHERA also tasked USEPA with developing a model plan for states for accrediting persons conducting asbestos inspection and corrective-action activities at schools.

The following specific procedures in place for handling ACMs, which the District will abide by as and when needed:

- Asbestos is to be handled only by qualified and certified contractors. Asbestos contractors/subcontractors must be approved in accordance with applicable federal, State, and local regulations and must be approved by the District to perform abatement and disposal of ACMs and ACCMs, as defined.
- It is the contractor's responsibility to review the Asbestos Assessment Report (Phase 1) and the Abatement Design (Phase 2) prepared for a site prior to the commencement of work, and to take the necessary steps to ensure the safety of students, faculty, contractor employees, and the public through compliance with regulatory and District-specific requirements.
- Contractors must verify the presence or absence of asbestos content in building materials prior to impacting these materials during construction remodeling or demolition work.
- Upon discovery of any ACMs or ACCMs or presumed asbestos-containing materials (PACMs) not identified in the Phase 1 report, the contractor will stop work in such areas and notify the District's Inspector. The material will be inspected and tested, if necessary, by the District's assigned environmental consultant.
- The contractor shall ensure employees are trained in asbestos awareness to identify ACMs, ACCMs, and PACMs. Training will be in compliance with the requirements of the District's standards. Proof of such training is required to be submitted to a District-authorized representative prior to commencement of work.
- All asbestos abatement and removal work must follow all regulations of the USEPA and/or applicable State agency, Cal/OSHA, and the SCAQMD.
- District personnel working in areas with ACMs or PACMs must have appropriate asbestos training, which may include minor abatement and compliance with negative exposure assessment protocols.

Lead

Lead is a naturally occurring element that can be found in various building materials and projects, such as paint (LBP), water pipes, and solder in plumbing systems. Because of its toxic properties, lead is regulated as a hazardous material. Lead is also regulated as a TAC. Any activity that involves cutting, grinding, or drilling during building renovation or demolition, or that involves relocation of underground utilities, could release lead dust or particles unless proper precautions are taken. Therefore, State-certified materials must be in compliance with applicable health and safety and hazardous materials regulations.

As with asbestos, all projects at existing school and office sites must be reviewed by the ATU for impact to lead-based paint prior to the project being started. All coated surfaces (paint, varnish, or glazed) are assumed to contain lead, and work that impacts coated surfaces must be performed by properly trained individuals.

Specific handling procedures for handling building materials that may contain lead are the following, with which the Asbestos Technical Unit (ATU) will ensure compliance as and when needed:

- Lead abatement, as defined, is to be performed by contractors or subcontractors whose workers are certified by the California Department of Public Health. Lead-related construction work may be performed by contractors' or subcontractors' workers who have been trained in lead awareness. Evidence of certification and/or training is required to be provided to the District's environmental representative prior to the commencement of work.
- It is the contractor's responsibility to review the assessment report addressing the impact to lead-based materials, lead-containing materials or coatings, and materials assumed to contain lead prior to commencement of work, and to take the necessary steps to ensure the safety of students, faculty, contractor employees, and the general public.
- Contractor must identify any LBP or coatings and assumed lead-containing coatings in or on the materials to be impacted within the proposed scope of work prior to any construction, remodeling, maintenance, repair, or demolition activities.
- No lead abatement will proceed until the District's environment representative has given written approval of the lead abatement contractor's written abatement work plan.
- No work by contractors other than the lead abatement contractor will be permitted to work in regulated areas until clearance is provided by the District's environmental representative.
- The lead abatement contractor or general contractor performing monitoring of lead-related construction work will be responsible for characterizing the waste stream (e.g., paint chips, components) and disposing of waste according to the characterization. Hazardous waste will be transported under a Uniform Hazardous Waste Manifest in accordance with District Standard Specification Section 13282.

PCB-containing caulking used around windows, door frames, building joints, and masonry building materials may be found in schools and other buildings built or renovated between 1950 and 1979. In addition, PCB's have been used in paints, mastics, and other adhesives, fireproofing materials, and in the manufacture of some ceiling tiles. Therefore, these would need to be remediated before construction of the proposed Project.

The District would comply with federal and State regulations and the District guidelines and procedures outlined above for lead, asbestos, and PCBs removal and remediation.

Impacts associated with the handling and disposal of ACMs and lead would be less than significant.

Threshold HAZ-10: If prepared, has the risk assessment been performed with a focus on children's health posed by a hazardous materials release or threatened release, or the presence of naturally occurring hazardous materials on the school site.

Construction

An HRA for construction activities was prepared for the proposed Project, as discussed in **Section 4.2: Air Quality** of this EIR. As shown in the HRA, the maximum carcinogenic risk estimate would be 8 in 1 million (8.8E-06), below the significance risk threshold of 10 in 1 million (1.0E-06). The SCAQMD recommends that projects that could emit or result in the emissions of TACs that exceed the maximum individual cancer risk of 10 in 1 million would be considered significant. Given that the analysis indicates that the potential hazard is less than SCAQMD's threshold, risks would be within acceptable limits.

As shown in the HRA, the hazard index total is less than 1.0 (1.3E-02). For noncarcinogenic hazards, SCAQMD recommends that the health risk for projects that could emit or result in the emissions of TACs exceeding the incremental chronic or acute noncancer Hazard Index of 1.0 be considered significant. Given that the analysis indicates that the potential hazard is less than SCAQMD's threshold, risks would be within acceptable limits

Impacts would be less than significant.

Operation

A separate HRA was prepared to evaluate the potential for off-site facilities generating hazardous and acutely hazardous air emissions within a 0.25-mile (1,320 feet) radius of the Project Site, attached as **Appendix D** of this Draft EIR. As shown in this HRA, the summation of risk factor for students was calculated to be 8.4 in 10,000,000 (8.4E-07) for a 4-year exposure and below the established threshold for students of 1 in 100,000 (1E-05). However, the summation of risk totaled 1.1 in 100,000 (1.1E-05) for adults (faculty and staff) exceeds the established threshold for long-term exposure (40 years). For noncarcinogenic hazards, the hazard index identified for respiratory, kidney, and eye target organs totaled less than 1 for both the staff and students. Therefore, impacts for long-term exposure for faculty and staff would be potentially significant, while impacts to students would be less than significant.

Impacts would be potentially significant.

Threshold HAZ-11: If a response action is necessary and proposed as part of this project, has it been developed to be protective of children’s health, with an ample margin of safety.

Land uses surrounding the Project Site consist of single- and multifamily residential uses to the north, west, and east, and a mix of residential and commercial uses to the south. Other nearby sensitive receptors include parks to the south and west; churches to the west, southwest, and east; daycare centers to the north and east; and a senior living center to the north. The closest of these—the residences to the north and east and a daycare facility to the southeast—are 50 feet away from the Project Site boundary.

Because these sensitive receptors could house or contain children for periods of the day, impacts from construction activities could have an impact on children’s health. However, prior to the issuance of a building permit, the proposed Project Site and any RECs must be remediated to the standards put forth by the DTSC or other responsible regulatory agencies. The risk evaluation and any required response actions would be a condition of approval for construction, demolition, or grading permits, and would be subject to review and/or approval by regulatory oversight agencies. These agencies could also require additional site investigation to more fully delineate the extent of contaminants of concern at the site. If extensive on-site excavation and/or soil off-haul is determined to be the appropriate response action for a site, additional CEQA review may be required to evaluate potential impacts for the response related to air quality, noise and traffic.

With regulatory compliance, impacts would be less than significant.

Threshold HAZ-12: Situated within 1,500 feet of a railroad track easement.

Per CCR Section 14010(d), if a proposed site is within 1,500 feet of a railroad track easement, a rail safety study shall be done by a competent professional to assess potential rail safety hazards. The closest train, the Metro Blue Line, is located approximately 670 feet east of the Project Site; therefore, a safety study was conducted.

As shown above and in the Rail Safety Study, in **Appendix M**, the probability that a hazardous material release would impact the high school—even if such materials were ever transported along the Metro Blue Line—is no greater than 2.95×10^{-4} at the Project Site boundary, based on the above discussion of extenuating factors.

The probability for a derailment of the Blue Line is considered low. Given the Metro Blue Rail Line is a passenger train with approximately 620 trips roundtrip per week during normal school hours, and the maximum speed of the rail line is 55 miles per hour, the calculated annual probability of a Metro rail line

derailment is roughly one train derailment every 10,000 years (or 9.51×10^{-5}); during hours of school occupancy, the annual probability of a derailment is lower, at 8.71×10^{-5} .

The District would maintain a Safe Routes to School Plan that emphasizes the risks of using the Metro rail line easement as a route to school while stressing the need for drivers, bicyclists, and motorcyclists to both strictly adhere to the traffic safety rules and comply with railroad safety warning devices with respect to the proposed Project.⁷¹

Impacts would be less than significant.

CUMULATIVE IMPACTS

As discussed in **Section 3.0: Environmental Setting**, a number of related development projects are proposed for sites within the City, which also contains the Project Site. The proposed Project, in combination with these related projects, would increase development in the City. **Table 3.0-2: Related Projects**, identifies 15 related projects that are planned or are under construction in the City.

Hazard impacts associated with a proposed project usually occur on a project-by-project basis rather than cumulatively. Other foreseeable development within the area, although likely increasing the potential to disturb existing contamination and the handling of hazardous materials, would be required to comply with the same regulations as the proposed Project. This includes federal and State regulatory requirements for transporting (CalEPA and Caltrans) hazardous materials or cargo (including fuel and other materials used in all motor vehicles) on public roads or disposing of hazardous materials (CalEPA and DTSC). Therefore, the proposed Project would not contribute to a cumulatively considerable hazardous materials impact. Therefore, cumulative impacts associated with the proposed Project are considered less than significant.

MITIGATION MEASURES

The following mitigation measure have been identified to potential significant impacts that could result in adverse long-term health effects associated with exposure of future faculty and staff:

HAZ-1: As part of the Project Design, install heating, air conditioning, and ventilation system that uses high-efficiency pleated particle filters with a Minimum Efficiency Reporting Values (MERV) 14 or higher as defined by the American Society of Heating, Refrigerating and Air-Conditioning Engineers Standard 52.2.⁷² for all buildings to be occupied on the campus.

71 Meridian Consultants LLC, *Rail Safety Study* (December 2017).

72 ASHRAE Standard 52.2 is the American Society of Heating, Refrigerating and Air-Conditioning Engineers document titled "Method of Testing General Ventilation Air-Cleaning Devices for Removal Efficiency by Particle Size" (2007) (ANSI/ASHRAE Standard 52.2-2007 including ANSI/ASHRAE Addendum b to ANSI/ASHRAE Standard 52.2-2007)

All MERV systems shall be certified as operational prior to occupancy of the building by a certified HVAC technician. MERV systems shall be operated on a continued basis while the building(s) are in use.

Limiting particulate infiltration by installing and maintaining air filtration systems with efficiencies of MERV 14 or better. High-efficiency (MERV 14 to 16 or higher) pleated particle filters for uses are generally considered the most effective approach to filtration because these filters can remove very small particles without emitting ozone, formaldehyde, or other harmful byproducts. Such high-efficiency filtration can reduce indoor PM2.5 and ultrafine particle levels by up to 90 percent (MERV 16) relative to incoming outdoor levels when doors and windows are kept mostly closed. However, only those particles in the airstream actually passing through the filter are removed. Any opening of windows or doors for at least part of the day would affect the pollutant reduction attained through the use of high-efficiency filters.

Table 4.8-2: Reduced Estimated Inhalation Cancer Risk to Faculty and Staff (40-Year Exposure), identifies the reduction in risk associated with incorporation of MERV 14 through MERV 16 filters when windows are open 25 percent, 50 percent, and 75 percent of the time. Implementation of MERV filters will reduce risk exposure to faculty and staff to below 1 in 100,000 (1.0E-05).

**Table 4.8-2
Reduced Estimated Inhalation Cancer Risk to Faculty & Staff (40-Year Exposure)**

Receptor	Estimated Reduction in Cancer Risks		
	MERV 14	MERV 15	MERV 16
Windows open 25 percent of the time	9.3E-06	9.19E-06	9.08E-06
Windows open 50 percent of the time	7.59E-06	7.38E-06	7.16E-06
Windows open 75 percent of the time	5.59E-06	5.57E-06	5.25E-06
Windows open 100 percent of the time	4.18E-06	3.75E-06	3.33E-06

Note: See Appendix D of the Health Risk Assessment provided in Appendix D of this EIR for calculations.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

With the implementation of the **Mitigation Measure HAZ-1**, potentially significant impacts would be reduced to less than significant.