

## 4.7 Hazards and Hazardous Materials

This section discusses the proposed project's potential to expose people and the environment to hazards and hazardous materials.<sup>1</sup>

### 4.7.1 Regulatory Setting

Hazardous substances are typically toxic, corrosive, ignitable, explosive, or chemically reactive. They may occur at a given location naturally, as a result of recent industrial or construction activities, or from historical uses. Hazardous substances are defined in the federal Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), Section 101(14), and also in CCR Title 22, Chapter 11, Article 2, Section 66261. Federal, state, and local laws regulate the use and management of hazardous or potentially hazardous or explosive substances.

For this analysis, if soil excavated from a site contains hazardous materials, it would be considered hazardous waste<sup>2</sup> if it exceeds specific CCR Title 22 criteria. Remediation (i.e., cleanup and safe removal/disposal) of hazardous wastes found at a site is required if excavation of these materials is performed; it may also be required if certain other activities are proposed. Even if soil or groundwater at a contaminated site does not have the characteristics required to define it as hazardous waste, remediation of the site may be required by regulatory agencies, subject to jurisdictional authority. Cleanup requirements are determined on a case-by-case basis by the agency taking lead jurisdiction.

#### Federal

##### **Federal Toxic Substances Control Act (1976) and the Resource Conservation and Recovery Act of 1976**

The Federal Toxic Substances Control Act (1976) and the Resource Conservation and Recovery Act of 1976 (RCRA) established a program, which is administered by the U.S. Environmental Protection Agency (EPA), for the regulation of the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA was amended in 1984 by the Hazardous and Solid Waste Act (HSWA), which affirmed and extended the "cradle to grave" system of regulating hazardous wastes. The use of certain techniques for the disposal of some hazardous wastes was specifically prohibited by HSWA.

##### **Comprehensive Environmental Response, Compensation, and Liability Act**

CERCLA, commonly known as Superfund, was enacted by Congress on December 11, 1980. This law provided broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA established requirements concerning closed and abandoned hazardous waste sites, the liability of persons who were responsible for releases of hazardous waste at these sites, and a trust fund to provide for cleanup

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<sup>1</sup> *Hazardous materials* are substances that have the potential to cause a health hazard or harm to the environment with improper management or disposal.

<sup>2</sup> *Hazardous waste* is the byproduct of processes and/or activities that can pose a substantial or potential hazard to human health or the environment from improper management or disposal.

when no responsible party can be identified. CERCLA also enabled revision of the National Contingency Plan (NCP). The NCP provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The NCP also established the National Priorities List. CERCLA was amended by the Superfund Amendments and Reauthorization Act on October 17, 1986.

## **National Emission Standards for Hazardous Air Pollutants**

EPA established National Emissions Standards for Hazardous Air Pollutants, which governs the use, removal, and disposal of asbestos-containing materials. Responsibility for implementing these requirements has been delegated to the state, which, in turn, has delegated the responsibility to the South Coast Air Quality Management District (SCAQMD). SCAQMD implements the National Emissions Standards for Hazardous Air Pollutants through Rule 1403, which is discussed below.

## **State**

### **California Hazardous Waste Control Law**

The California Hazardous Waste Control Law (HWCL) is administered by the California Environmental Protection Agency (CAL/EPA) to regulate hazardous wastes. Although the HWCL is generally more stringent than the RCRA, until EPA approves the California program, both the state and federal laws apply in California. The HWCL lists 791 chemicals and about 300 common materials that may be hazardous. The HWCL also:

- Establishes criteria for identifying, packaging, and labeling hazardous wastes;
- Prescribes management controls;
- Establishes permit requirements for treatment, storage, disposal, and transportation; and
- Identifies some wastes that cannot be disposed of in landfills.

Hazardous substances are defined by state and federal regulations to protect public health and the environment. Hazardous materials have certain chemical, physical, or infectious properties that cause them to be considered hazardous. According to CCR Title 22, Chapter 11, Article 3, substances having toxicity, ignitability, corrosivity, or reactivity characteristics are considered to be hazardous. Examples of hazardous wastes include materials that have been abandoned, discarded, spilled, or contaminated or stored prior to proper disposal.

Toxic substances can cause both short-term and long-lasting health effects, ranging from temporary effects to permanent disability to death. For example, toxic substances can cause eye or skin irritation, disorientation, headache, nausea, allergic reactions, acute poisoning, chronic illness, or other adverse health effects if human exposure exceeds certain levels (the level depends on the substance involved). Carcinogens (substances known to cause cancer) are a special class of toxic substance. Examples of toxic substances include most heavy metals, pesticides, and benzene (a carcinogenic component of gasoline). Ignitable substances are hazardous because of their flammable properties. Gasoline, hexane, and natural gas are examples of ignitable substances. Corrosive substances are chemically active and can damage other materials or cause severe burns upon contact. Examples of corrosive substances include strong acids and bases such as sulfuric (battery) acid or lye. Reactive substances may cause explosions or generate gases or fumes. Explosives,

pressurized canisters, and pure sodium metal, which reacts violently with water, are examples of reactive materials.

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

### **Hazardous Material Worker Safety**

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

## **Regional and Local**

### **South Coast Air Quality Management District Rule 1403**

Rule 1403, as amended, specifies work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACMs). The requirements for demolition and renovation activities pertain to asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and cleanup procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste materials. All operators are required to maintain records, including waste shipment records, and use appropriate warning labels, signs, and markings.

### **Los Angeles County**

The Los Angeles County Department of Public Works (DPW), Environmental Programs Division (EPD), prepares and administers the Los Angeles County Integrated Waste Management Plan and Hazardous Waste Management Plan, which provide direction for the proper management of all waste generated within the county. As the county’s lead agency, EPD advises the Los Angeles County Board of Supervisors regarding all waste management issues. EPD implements numerous programs to meet state-mandated solid waste reduction goals, such as programs for recycling, composting, source reduction, household hazardous waste management, and public education. In addition, EPD regulates underground storage tanks in unincorporated areas and more than 76 cities to protect groundwater resources. This program, which is the largest in the state, involves some 10,000 underground tanks at more than 2,500 sites. Site remediation plans are reviewed and approved prior to the cleanup of contamination caused by leaking underground storage tanks (USTs). EPD also regulates industrial waste management systems at 5,000 generator sites and permits and inspects industrial waste discharges into more than 3,000 miles of local sewers within the unincorporated areas and 38 contract cities. EPD also responds as a support unit to reported incidents involving existing and/or potential discharges of contaminants or toxic materials/waste into DPW drainage facilities.

## City of La Cañada Flintridge

LCF has adopted Title 20 of the Los Angeles County Code to regulate sanitary sewers and industrial waste.

### 4.7.2 Environmental Setting

Environmental Data Resources (EDR) was retained to perform an environmental database search for locations identified as hazardous substance and/or hazardous waste facilities near the subject property (EDR 2013). The search returned results from the databases described below, and Table 4.7-1 provides details about the search results for the project site.

- RCRAInfo is EPA’s comprehensive information system, providing access to data supporting RCRA and HSWA. The database includes selective information on sites that generate, transport, store, treat, and/or dispose of hazardous waste, as defined by RCRA. Small-quantity generators (SQGs) generate between 100 and 1,000 kilograms (kg) of hazardous waste per month.
- Facility Index System/Facility Registry System Facility Index System (FINDS): FINDS contains both facility information and “pointers” to other sources that contain more detail. EDR includes the following FINDS databases in this report: PCS (Permit Compliance System), AIRS (Aerometric Information Retrieval System), DOCKET (Enforcement Docket—used to manage and track information on civil judicial enforcement cases for all environmental statutes), FURS (Federal Underground Injection Control), C-DOCKET (Criminal Docket System—used to track criminal enforcement actions for all environmental statutes), FFIS (Federal Facilities Information System), STATE (State Environmental Laws and Statutes), and PADS (PCB Activity Data System).
- HAZNET: The data are extracted from the copies of hazardous waste manifests received each year by the California Department of Toxic Substances Control (DTSC). The annual volume of manifests<sup>3</sup> is typically 700,000 to 1,000,000, representing approximately 350,000 to 500,000 shipments. Data from non-California manifests and continuation sheets are not included. Data are from the manifests submitted without correction and, therefore, many contain some invalid values for data elements such as generator ID, TSD ID, waste category, and disposal method.
- Los Angeles County Hazardous Materials System (HMS): The Los Angeles County Department of Public Works’ Street Number List contains sites with industrial waste and USTs.
- National Pollutant Discharge Elimination System (NPDES) Permits Listing: Provides a list of sites that have NPDES permits, including for construction.

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<sup>3</sup> A *manifest* is a set of forms, reports, and procedures designed to track hazardous waste seamlessly, from the time it leaves the generator facility where it was produced until it reaches the off-site waste management facility that will store, treat, or dispose of the hazardous waste.

**Table 4.7-1: EDR Search Results**

Site	Database	Search Radius	Description	Violations
Flintridge Sacred Heart Academy	RCRAInfo (RCRA-SQG)	0.25 mile	Small-Quantity Generator/Handler: Generates more than 100 kg but less than 1,000 kg of hazardous waste at any time during any calendar month and accumulates more than 1,000 kg of hazardous waste at any time or generates 100 kg or less of hazardous waste during any calendar month and accumulates less than 6,000 kg of hazardous waste at any time.	None
Flintridge Sacred Heart Academy	FINDS	Target Property	Registry ID: 110012215815	None
Flintridge Sacred Heart Academy	HAZNET	Target Property	Four separate records of hazardous manifests were identified, as follows: <b>1999:</b> 0.0125 ton of asbestos-containing waste was disposed of at a transfer station, and an additional 0.927 ton was disposed of at a landfill. <b>2001:</b> 0.16 ton of liquid with a pH of less than 2 was disposed of at a transfer station, and 0.49 ton of polychlorinated biphenyl-containing material was disposed of through treatment and incineration. <b>2004:</b> 0.12 ton of an unspecified solvent mixture was disposed of at a recycler, and 0.2 ton of an unspecified organic liquid mixture and 0.22 ton of latex waste were disposed of at a transfer station. <b>2010:</b> 1.6 tons of asbestos-containing waste was disposed of at a landfill/surface impoundment.	None
Flintridge Sacred Heart Academy	L.A. County HMS	Target Property	Facility ID: 017663-024211; the facility is permitted under permit number 000187133.	None
Flintridge Sacred Heart Academy	NPDES	Target Property	General Permit for Stormwater Discharges Associated with Construction and Land Use Disturbance Activities; NPDES No. CAS000002, effective July 2010 through September 2, 2014.	None
Source: EDR 2013.				

## 4.7.3 Environmental Impact Analysis

### Methodology

Data from the July 2013 EDR report prepared for the project, along with other sources, were used to ascertain the likelihood of construction and/or operation of the proposed project resulting in significant impacts with respect to hazards and hazardous materials.

### Thresholds of Significance

For the purposes of the analysis in this EIR, which is made in accordance with Appendix G of the State CEQA Guidelines, project alternatives would cause a significant impact with respect to hazards or hazardous materials if they would:

1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
2. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
3. Emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school;
4. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment;
5. Be located within an airport land use plan or within 2 miles of a public airport or public use airport and result in a safety hazard for people residing or working in the project area;
6. Be located within the vicinity of a private airstrip and result in a safety hazard for people residing or working in the area;
7. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or
8. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or residences are intermixed with wildlands.

### Construction Impacts

#### Transport, Use, or Disposal of Hazardous Materials

As indicated in Table 4.7-1, the records from the HAZNET database related to hazardous materials manifests show that small quantities of hazardous materials have been temporarily stored or removed from the FSHA campus. Given the age of the buildings that would be demolished as part of the project, the prevalence of asbestos as a building material, and the fact that ACMs have previously been removed from the campus, it is probable that ACMs could be encountered during the construction period. In addition, the age of the structures to be demolished makes it likely that lead-based paints could be encountered during demolition activities. Structure demolition and disposal of these materials in accordance with applicable laws and regulations would ensure that related impacts would be less than significant.

Hazardous materials, including fuels and other substances used to service construction equipment at the project site, may be used. These activities would be short term and subject to applicable federal, state, and local health and safety regulations and, therefore, would not result in a significant impact.

Construction activities would occur on an active private school campus, and hazardous materials would be handled during the construction period. Although not anticipated given that construction activities would comply with local, state, and federal laws and regulations, there is the potential for emission of small quantities of hazardous substances within 0.25 mile of a school. With implementation of Mitigation Measure HAZ-1, impacts would be less than significant.

The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, therefore, would not create a significant hazard to the public or the environment.

### **Airport Hazards**

The project site is not within an airport land use plan or within 2 miles of a public airport or private airstrip. The nearest airport is Bob Hope Airport in Burbank, which is approximately 10 miles west of the project site. No impact related to safety hazards from air travel would occur as a result of construction of the proposed project.

### **Emergency Response**

Emergency responders would travel to and from the project site via St. Katherine Drive, either from the streets of LCF or from the Glendale portion of the San Rafael Hills. Given the density of the campus and the proximity of the proposed Plan Area 1 parking structure to the roadway, it would be necessary for construction personnel and equipment to occupy a portion of St. Katherine Drive during construction in Plan Area 1 and possibly in other Plan Areas. However, at least one traffic lane would remain open throughout the construction period, allowing emergency responders to get to and from the project site and surrounding areas in the event of an emergency. Partial road closures have the potential to increase delays for emergency service responders in the area, but with implementation of Mitigation Measure HAZ-2, impacts related to emergency response would be less than significant.

### **Wildland Fires**

The project site is in the San Rafael Hills, which, despite the presence of substantial residential development, have a large amount of undeveloped land on the steep hillsides. These undeveloped areas are covered with vegetation that is characteristic of coastal sage scrub and chaparral communities and may experience periodic wildfires. Although the project site is adjacent to vegetated areas, construction is not anticipated to cause wildfires or increase their severity. Construction would involve site-specific activities, and any elements of construction involving fire (e.g., welding) would be tightly controlled at the construction site. Therefore, impacts related to wildfires would be less than significant.

### **Southern California Edison Subtransmission Line**

Construction of the SCE subtransmission line would result in the generation of various waste materials, including wood, metal, soil, vegetation, and sanitation waste (portable toilets). Sanitation

waste (i.e., human-generated waste) would be disposed of in accordance with sanitation waste management practices. Material from existing infrastructure that would be removed, such as conductor, steel, and debris, would be temporarily stored at SCE's Monrovia Service Center and/or transported to appropriate SCE facilities for later disposal. Material excavated would either be used as backfill for other project elements, made available for use by the landowner, or disposed of off site at a licensed waste facility. If contaminated material is encountered during excavation, work would stop at that location and SCE's Spill Response Coordinator would be called to the site to make an assessment and, if necessary, notify the appropriate authorities. Other hazardous construction materials, if present, will be stored, handled, and used in accordance with applicable regulations. Material Safety Data Sheets will be available at the construction site for all crew workers. With the aforementioned standard plans in place during the construction period, impacts related to hazardous materials would be less than significant.

SCE subtransmission line construction may require temporary disruptions to the transportation network. Any lane closures, pedestrian traffic control, and parking restrictions would be communicated to emergency and service providers as part of the traffic management plan outlined in Mitigation Measure HAZ-2. Hazards associated with installation of lines across transportation rights-of-way would be minimized with the use of guard structures<sup>4</sup> or specially equipped boom trucks for wire stringing and removal activities. Impacts would be less than significant.

Much of the SCE subtransmission line would travel through undeveloped portions of the San Rafael Hills. SCE electricity facilities would be removed and installed in accordance with state and federal regulations and temporary outages would be employed as need to conduct work safely. Fire-related risks would be minimal, and impacts would be less than significant.

## Operational Impacts

### Transport, Use, or Disposal of Hazardous Materials

The proposed project is not expected to require the routine use and transport of hazardous materials in addition to those typically associated with janitorial or grounds maintenance activities. Any hazardous materials on the project site would be used and disposed of in compliance with existing regulations. Therefore, impacts related to the routine transport, use, and disposal of hazardous materials would be less than significant.

### Airport Hazards

The project site is not within an airport land use plan or within 2 miles of a public airport or private airstrip. The nearest airport is Bob Hope Airport in Burbank, which is approximately 10 miles west of the project site. No impact related to safety hazards from air travel would occur as a result of operation of the proposed project.

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<sup>4</sup> *Guard structures* are temporary facilities that may be installed at transportation, flood control, and utility crossings for wire stringing/removal activities. These structures are designed to stop the movement of a conductor should it momentarily drop below a conventional stringing height.

## Emergency Response

Following construction of the proposed project, emergency service providers would be able to get to and from the project site and adjacent areas in the same manner as under existing conditions. No long-term operational impact related to emergency response would occur.

## Wildland Fires

Project operation would not change the wildland fire risk at the FSHA campus because the function of the campus would not change. The project would not extend the campus into virgin wildland areas. Therefore, it would not make the campus more vulnerable to wildfires. No impacts related to wildfires would occur as a result of project operation.

## Southern California Edison Subtransmission Line

The SCE subtransmission line would use the existing utility right-of-way and would function in a manner identical to the line currently in operation. Risks related to hazards and hazardous materials are not anticipated to change, and impacts would be less than significant.

### 4.7.4 Mitigation Measures

- HAZ-1** To the extent feasible, demolition activities will be scheduled to occur when the fewest students are on campus (e.g., summer vacation) to reduce the risk to student health resulting from the removal of asbestos-containing materials.
- HAZ-2** A Construction Traffic Management Plan (CTMP) will be prepared for the proposed project prior to construction of each development project. At a minimum, the CTMP will contain provisions related to communicating information regarding partial and full road closures to the public and emergency service providers. In addition, the CTMP will specify the actions that will be taken by the construction contractor to mitigate traffic delays that may affect emergency service providers when traveling to and from the area.

### 4.7.5 Significant Unavoidable Impacts

Following implementation of Mitigation Measures HAZ-1 and HAZ-2, there would be no significant unavoidable impacts.

### 4.7.6 Cumulative Impacts

All projects within 0.5 mile of the campus and the proposed SCE subtransmission line are site-specific projects, including additions and remodels of existing structures. Such projects would not temporarily or permanently increase the amount of hazardous materials in the area and would not pose additional hazards compared with existing conditions. Cumulative impacts would not be considerable, and the project would not contribute to a significant cumulative impact.

