

**Description of Baseline Environmental Conditions:** The Site is located in a highly disturbed and developed, capped, urbanized commercial and residential area. Hazards and hazardous materials at the Site are limited to arsenic contaminated soils. Refer to the “Project Background” and “Selection of Site Remedy” sections within the Project Description section of this Initial Study, which discuss the Site contamination and cleanup goals for the Site. As discussed in the Project Description Section of this IS, hazards and hazardous materials are limited to arsenic-contaminated soils. Approximately 4,400 cubic yards of contaminated materials will be handled, transported and disposed of at a licensed facility permitted to accept the material in accordance with local, state and federal regulations. Potential receptors include building occupants, workers and the local industrial and commercial population in the vicinity of the project. The nature and extent of contamination at Site are based on nine phases of environmental investigations that were implemented between 1988 and 2010. Data collected from these investigations includes laboratory testing of numerous soil, and groundwater samples, as well as detailed field observations and documentation. The collective data from these efforts have been analyzed and presented in the Remedial Investigation Report (RI Report) dated August 2006. Based on the findings of the RI Report, arsenic has been identified as the chemical of concern (COC) present in site soils at concentrations up to 996 milligrams per kilograms (mg/kg), concentrations that could present potential risk to humans or environmental receptors (wildlife) if not addressed by further response. Chemical testing conducted during the remedial investigation process demonstrated that the elevated concentrations in soil were not soluble and not migrating. A groundwater investigation conducted in 2008 and 2009 confirmed these findings and demonstrated that arsenic had not migrated to groundwater.

As part of the RAW, remedial action objectives (RAOs) were developed to identify and screen remedial alternatives that protect human health and the environment and are consistent with reasonably anticipated land use. RAOs are media-specific (such as soil) goals for protecting human health and the environment that provide the foundation used to develop remedial alternatives. Excavation of COCs in soil would (1) ensure that exposure pathways would be eliminated for future commercial, multi-use, and multi-unit residential use, (2) prevent exposure to arsenic in soil to 2 to 5 feet below ground surface, and (3) reduce the potential for COCs in soil. The RAOs for the Site were developed for the reasonably anticipated future commercial and multi-unit residential land use consistent with the United States Environmental Protection Agency’s (US EPA’s) land use directive for Comprehensive Environmental Response and Liability Act (CERCLA) remedy selection.

The remedial goals (RG) for the Site were established based on DTSC’s determination of arsenic background in the area. The RGs established for the Site are to: a) protect public health and the environment from exposures to the COCs by inhalation, dermal contact and ingestion based on future industrial land uses, and for protection of construction workers; and b) meet all Applicable or Relevant and Appropriate Requirements (ARARs) for the Site cleanup.

The soil remedial goals established for the Site are as follows:

<b>COCs in Soil</b>	<b>Maximum Concentration (mg/kg)</b>	<b>Soil Remediation Goal milligrams per kilogram (mg/kg)</b>
Arsenic	996 mg/kg	0 to 2 feet < 25 milligrams per kilogram (mg/kg)

Analysis as to whether or not project activities would:

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

**Impact Analysis:** The proposed remedial activities for the Site consist of site preparation, excavation of soil, confirmation soil sampling, transportation and disposal of soil to off-site permitted landfills, and site restoration. The proposed project would be implemented in accordance with applicable state and federal occupational and health safety standards as set forth in 29 Code of Federal Regulation (CFR) 1910 and 1926, California Health and Safety Regulations as set forth in Title 8, California Code of Regulations (CCR) 5192, for work at hazardous waste sites. A Health and Safety Plan (HASP) would be developed and implemented to minimize incidents, injury, and health risks associated with the remedial measures proposed at the Site. Additionally, the management of hazardous substances and/or potentially hazardous wastes, adherence to Site controls and plans, and the limited duration of the excavation activities (approximately 60 days) are anticipated to result in no significant hazard to the public or the environment from project activities. The HASP describes controls and procedures for health and safety risk monitoring during the implementation of project activities. For example, the HASP would include controls such as personal protective equipment that shall be used while performing work on the Site and procedures and engineering controls and safe work practices for the proper implementation of the work. In addition, the HASP includes health and safety air monitoring. Investigation-derived waste generated during performance monitoring activities is expected to be classified as nonhazardous. However, any remediation waste considered potentially hazardous would be properly managed in accordance with the Resource Conservation and Recovery Act (RCRA) and DTSC guidelines and transported for disposal off-site at a properly licensed hazardous waste