

6.8 HAZARDS AND HAZARDOUS MATERIALS

6.8.1 OVERVIEW AND SUMMARY

A number of documented hazardous conditions exist on the proposed project site. Existing structures on the site contain both asbestos-containing materials and lead-based paint. . Construction, including the removal of all existing hazardous materials, would occur adjacent to St. John's Major Seminary. Finally, the proposed project site is adjacent to and contains areas designated as having a moderate fire hazard on state fire hazard maps. Mitigation measures are provided below which would address each of these potential impacts and reduce all to a less than significant level.

6.8.2 LITERATURE AND DATA REVIEW

Project-Related Studies

The following technical reports were prepared for the proposed project and utilized in the preparation of this analysis are available in **Appendix 6.8**:

- West Coast Environmental and Engineering. *Phase I Environmental Site Assessment*. 2004.
- West Coast Environmental and Engineering. *Results of Asbestos and Lead Paint Survey*. October 29, 2004.
- McKenna Environmental. *Lead Investigation*. October 11, 2004.
- Environmental Data Resources, Inc., *St. John's Specific Plan, Camarillo, California*, 2011.

6.8.3 METHODOLOGY

Analysis contained in this section is based on site reconnaissance, records reviews, and interviews provided in the Phase I environmental site assessment (ESA), and asbestos and lead paint survey. A records search for reported hazard sites in the vicinity of the proposed project site was performed. The Phase I ESAs and records search were performed in conformance with the American Society for Testing and Materials (ASTM) Standard E1527-05, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*.¹

¹ American Society for Testing and Materials, Standard E1527-05, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.

6.8.4 APPLICABLE REGULATIONS

Federal Regulations

The US Environmental Protection Agency (US EPA) 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 US EPA works collaboratively with other agencies to enforce materials handling and storage regulations and site cleanup requirements. The Occupational Safety and Health Administration (OSHA) and the Department of Transportation (DOT) are authorized to regulate safe transport of hazardous materials.

Asbestos Hazard Emergency Response Act

The Asbestos Hazard Emergency Response Act (AHERA) provides guidance for the management of asbestos-containing materials (ACM) 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 ACM.²

US Department of Housing and Urban Development

The US Department of Housing and Urban Development's (HUD) "Guidelines for the Evaluation and Control of Lead-based Paint Hazards in Housing"³ provides comprehensive technical information on how to identify lead-based paint hazards in housing and how to control such hazards safely and efficiently. The goal of the guidelines is to help property owners, private contractors, and government agencies reduce exposure to lead without unnecessarily increasing the cost of housing. The guidelines address lead hazards posed by paint, dust, and soil in the residential environment. Paint that is found to have a lead concentration of at least 1 milligram per cubic centimeter (mg/cm²) is considered to be lead-based paint. Furthermore, interior or exterior paints that have greater than 90 parts per million (ppm) (0.009 percent) of lead are considered by the Consumer Products Safety Commission to be lead-based paint.⁴ Finally, any material containing detectable lead is subject to OSHA's Lead Exposure in Construction Rule,⁵ which requires employers to ensure that employees are not exposed to lead at

² US Code, Title 15, Section 2641 et seq. "Asbestos Hazard Emergency Response," contains the codified requirements of both AHERA and ASHARA.

³ US Department of Housing and Urban Development, "Guidelines for the Evaluation and Control of Lead-based Paint Hazards in Housing," *Federal Register*. 2012.

⁴ Consumer Product Safety Commission, Total Lead Content, Website: <http://www.cpsc.gov/en/Business--Manufacturing/Business-Education/Lead/Total-Lead-Content/>, accessed July 28, 2016

⁵ US Code of Federal Regulations, Title 29, Part 1926, "State Plan Responses to Federal OSHA Standards."

concentrations greater than 50 micrograms per cubic meter of air (50 µg/m³) averaged over an 8-hour period.

Resource Conservation and Recovery Act (RCRA)

RCRA is the public law that creates the framework for the proper management of hazardous and non-hazardous solid waste. The law describes the waste management program mandated by Congress that gave EPA authority to develop the RCRA program. The term RCRA is often used interchangeably to refer to the law, regulations, and EPA policy and guidance.

State Regulations

Department of Toxic Substances Control

The State Department of Toxic Substances Control (DTSC) is authorized by CAL 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) [a]ll hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code (HSC).”⁶

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.⁷

California Department of Conservation, Division of Oil, Gas, and Geothermal Resources

The California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR) is mandated by Section 3106 of the Public Resources Code to supervise the drilling, operation, maintenance, and abandonment of oil and gas wells for the purpose of preventing (1) damage to life, health, property, and natural resources; (2) damage to underground and surface waters suitable for irrigation or domestic use; (3) loss of oil, gas, or reservoir energy; and (4) damage to oil and gas deposits by infiltrating water and other causes. The regulations can be found in the California Code of Regulations (CCR) Title 14.

⁶ California Government Code, Title 22, Section 65962.5.

⁷ California Health and Safety Code, Section 25187.5.

DOGGR's Well Review Program assists developers in addressing issues associated with development near oil and gas wells.⁸

Lead-Based Paint Regulations

The CCR sets standards for lead hazard assessment and abatement, removal, certification of individuals engaged in lead-based paint activities, and accreditation of training providers.⁹ The CCR also contains regulations governing worker safety during lead-related construction activities, including demolition.¹⁰

These regulations cover

- (1) *demolition or salvage of structures where lead or materials containing lead are present;*
- (2) *removal or encapsulation of materials containing lead;*
- (3) *new construction, alteration, repair, or renovation of structures, substrates, or portions thereof, that contain lead, or materials containing lead;*
- (4) *installation of products containing lead;*
- (5) *lead contamination/emergency cleanup;*
- (6) *transportation, disposal, storage, or containment of lead or materials containing lead on the site or location at which construction activities are performed, and*
- (7) *maintenance operations associated with the construction activities described in this subsection.*¹¹

Local Regulations

Ventura County Air Pollution Control District

The Ventura County Air Pollution Control District (VCAPCD) is the local authority for hazardous emissions, including asbestos. The US EPA established the National Emission Standards for Hazardous Air Pollutants¹² (NESHAP) for asbestos in order to minimize the release of fibers during activities

⁸ California Division of Oil, Gas, and Geothermal Resources, *Well Review Program Introduction and Application*, 2007 ftp://ftp.consrv.ca.gov/pub/oil/Well_Review_Program.pdf.

⁹ California Code of Regulations, Section 35001 et seq.

¹⁰ California Code of Regulations, Section 1532.1 et seq.

¹¹ California Code of Regulations, Section 1532.1a.

¹² US Code of Federal Regulations, Title 40, Part 61, "National Emission Standards for Hazardous Air Pollutants."

involving asbestos handling. VCAPCD regulates asbestos demolition and renovation operations using Rule 62.7 instead of the NESHAP.¹³

VCAPCD Rule 62.7 applies to all renovation and demolition operations, including those not previously regulated under NESHAP. The rule applies to operations at dwelling units and operations involving 100 or more square feet of ACM. Under Rule 62.7, written notification must be postmarked or delivered to VCAPCD at least 10 working days before work that may disturb ACM begins.

Ventura County Environmental Health Division

The Ventura County Hazardous Materials Program, administered by the County Environmental Health Division, is the Certified Unified Program Agency (CUPA) for the County. The CUPA provides regulatory oversight for the following programs: Hazardous Waste Generator, Hazardous Waste Generator On-Site Treatment (Tiered Permit), Underground Storage Tank, Aboveground Storage Tank Spill Prevention Control and Countermeasure Plan, Hazardous Materials Release Response Plans and Inventory (Business Plan), and Risk Management Plan.

In addition to conducting annual facility inspections, the Hazardous Materials Program is involved with hazardous materials emergency response, investigation of the illegal disposal of hazardous waste, public complaints, and stormwater illicit discharge inspections.

Ventura County Fire Protection District

The proposed project would be subject to requirements of the Ventura County Fire Protection District (VCFPD), which sets standards for water supplies, access, and fire protection equipment. Fire Prevention Standards 14.6. sets access road standards and includes requirements for secondary access.¹⁴

City of Camarillo

Safety Element

The *City of Camarillo General Plan Safety Element*¹⁵ addresses hazardous materials and their management.

The City of Camarillo, in conjunction with the County of Ventura, has adopted the Hazardous Waste/Materials Management Plan,¹⁶ which addresses the storage, disposal, and use of hazardous

¹³ Ventura County Air Pollution Control District, "Asbestos," <http://www.vcapcd.org/asbestos.htm>.

¹⁴ Ventura County Fire Department, "Standards and Guidelines" 2016, <https://vcfd.org/FP-Standards-Guidelines>

¹⁵ City of Camarillo, *City of Camarillo General Plan, "Safety Element,"* 2013.

materials. The City of Camarillo is implementing the plan by incorporating the parts of the plan which pertain to Camarillo into the General Plan Safety Element. The parts that pertain to County and regional programs which do not require actions by the City have not been incorporated into the City plan. This has occurred with the knowledge that the County will implement the regional components of the County Hazardous Waste Management Plan.

The overall objective of the hazardous waste management component of the Safety Element is to “ensure that safe, effective, and economical facilities for the management of hazardous wastes are available when they are needed, which protects public health and the environment” pursuant to state law.¹⁷

Hazardous materials in context of the plan are found throughout the City and encompass the paints and cleaning solvents commonly found in the home along with chemicals commonly used in the commercial and industrial areas of the City. No area in Camarillo is exempt from hazardous materials and procedures need to be established for the storage and disposal of these materials. The County plan outlines a countywide program for hazardous materials management which can be used in developing an expanded program for Camarillo.

“Hazardous material” refers to a substance or substances which, because of quantity or concentration, or physical, chemical, or infectious characteristic, may either (1) cause or significantly contribute to an increase in mortality or an increase in serious illness, or (2) pose a substantial present or potential hazard to human beings or the environment. The County Hazardous Waste/Materials Management Plan includes a strategy for the management of these materials Countywide.

The City has established a series of programs to address household hazard waste that are provided in the Hazardous Materials and Waste portion of the Safety Element.¹⁸ Implementation of these programs in Camarillo will minimize the risk of loss of life, injury, serious illness, damage to property, and economic and social dislocations resulting from the use, storage, and disposal of household hazardous waste.

Evacuation Routes

Planned evacuation routes in Camarillo are dependent upon the type of event triggering the need for evacuation.¹⁹ During a breach of the Bard Reservoir, the only required evacuation route would be the movement onto high ground out of the flood plain, which is generally north of Ponderosa, westerly of

¹⁶ City of Camarillo, *City of Camarillo General Plan, “Safety Element,”* (1989) 11.68–11,116.

¹⁷ California Health and Safety Code, Chapter 6.5, Division 20, Section 25100 et seq.

¹⁸ City of Camarillo, General Plan, “Safety Element,” Hazard Materials and Waste, May 2013. pp. 11.60.

¹⁹ City of Camarillo, General Plan, “Safety Element,” Evacuation Routes, May 23. p. 11.49.

Ponderosa and Las Posas and easterly of Calleguas Creek northerly of Ventura Freeway. In the event of a major chemical spill or other significant disaster, the City would be evacuated using Highway 101 for easterly and westerly traffic or Lewis Road for northerly or southerly traffic.

The City of Camarillo has formed a disaster preparedness team composed of the fire, police, City employees, and volunteer groups that will come together in the event of a community disaster, be it an earthquake, dam break, plane crash, or other emergency. This team conducts regular disaster preparedness drills and would coordinate the evacuation of areas of Camarillo.

6.8.5 EXISTING CONDITIONS

Local Setting

A records search for hazards sites near the proposed project site returned six sites within the 1-mile search radius. Several databases provide information on hazards sites. **Table 6.8-1, Hazards Databases**, lists the sources that returned results for the proposed project area and the types of sites that each database tracks. **Table 6.8-2, Recorded Hazards Sites in the Project Vicinity**, lists these sites and their locations.

Database	Description	Source
Cortese	Lists public drinking water wells with detectable levels of contamination, hazardous substances sites selected for remedial actions, sites with known toxic material identified through the abandoned site assessment program, sites with underground storage tanks (USTs) having a reportable release and all solid waste disposal facilities from which there is known migration.	Cal/EPA Office of Emergency Information
LUST	Lists reported leaking underground storage tank incidents.	State Water Resources Control Board
UST	Lists registered underground storage tanks.	State Water Resources Control Board
HIST UST	Lists historical registered underground storage tanks.	Environmental Data Resources
CA BWT	The business plan, hazardous waste producers, and operating underground storage tanks site address lists sites with hazards-related business plan, waste producer, or underground tank information.	Environmental Data Resources
Notify 65	Lists facility notifications about any release that could impact drinking water and thereby expose the public to a potential health risk.	State Water Resources Control Board
Cleaners	Lists dry cleaning and related facilities.	Environmental Data Resources

Database	Description	Source
Haznet	Data is extracted from California hazardous waste manifests.	Department of Toxic Substances Control

Source: *Environmental Data Resources, Inc. 2011.*

**Table 6.8-2
Recorded Hazards Sites in the Project Vicinity**

Facility	Address	Databases Listed	Distance from Project Site (miles)	Type of Facility/Listing	Case Status
Agland Services	2789 Somis Road	Cortese LUST UST HIST UST CA BWT HAZNET	< 0.25	Agricultural	Closed
St. John's Pleasant Valley Hospital	2309 Antonio Avenue	Cortese LUST	< 1.0	Medical Facility	Closed
St. John's Seminary	5012 Seminary Road	Cortese LUST	< 0	Educational Facility	Closed
Ojai Tapo Citrus Assoc.	3040 Somis Road	Notify 65	< 1.0	Agricultural	N/A
M. Nishimori Farms, Inc.	2901 Somis Road	UST HIST UST	< 0.5	Agricultural	N/A
Crossroads Cleaners	4421 Las Posas Road	Cleaners	< 0.5	Dry Cleaner	N/A
Bell Ranch	2901 Somis Road	HIST UST	< 0.5	Agricultural	N/A

Source: *Environmental Data Resources, Inc. 2011.*

Project Site

The earliest documented use of the proposed project site is agriculture (citrus orchards). As discussed in **Section 6.5, Cultural Resources**, the site was part of the Camarillo Ranch, and was under agricultural cultivation for most of the 20th century. Portions of the site are still under agricultural use. Existing structures on the site are on a septic wastewater disposal system.

Several area regulatory agencies were contacted during the preparation of the Phase I report in order to obtain information about potential hazards existing on the proposed project site. The Camarillo Building and Safety Department was contacted for information on existing structures on the proposed project site. The Ventura County Environmental Health Division (VCEHD) Leaking Underground Fuel Tank (LUFT), Individual Sewage Disposal System, Hazardous Material Program, Underground Tank, and Hazardous

Material Release Reports Databases were reviewed. The Ventura County Public Works Agency Water Resources Division provided information on water wells. DOGGR supplied information on oil wells on the proposed project site.

Hazardous Materials Storage and Use

Hazardous materials currently on the site were noted in the Phase I assessment, and were limited to a small quantity of hazardous materials:

- **Carport:** Flammable storage lockers contained small fuel containers for maintenance equipment, paint, and routine maintenance materials.
- **Recreation area/handball courts:** A small room on the east side of the handball courts contained a drum of unidentified lubricant and a drum of a fertilizer/pesticide.

No discolored soil or asphalt was found during the Phase I survey.

Sumps, Pits, and Clarifiers

An in-ground mechanic's pit is located in the small wood shop building east of the carport. The pit was covered and inaccessible at the time of the site survey. No other sumps, pits, or clarifiers were identified.

Electrical Transformers

Transformers owned by Southern California Edison (SCE) are located throughout the proposed project site. SCE has stated that none of their existing transformers contain polychlorinated biphenyls at concentrations requiring special management under US EPA regulations.

Oil Wells

DOGGR records identified one oil well, "St. John's Seminary 1-20," on the St. John's Seminary site. Well St. John's Seminary 1-20 was drilled and abandoned in 1984 without producing any significant oil. It appears to have been located in the southeastern portion of the site, in the vicinity of an existing aboveground water tank.

Asbestos-Containing Materials

An asbestos-containing materials (ACM) survey²⁰ was completed on the proposed project site in October 2004. The existing structures on the site were built in the early 1960s, prior to later restrictions on

²⁰ West Coast Environmental and Engineering, *Results of Asbestos and Lead Paint Survey*, 2004.

the use of ACM in construction. Potential ACM in buildings on the proposed project may include acoustical ceiling tiles, floor tiles and mastics, caulking and putties, decorative plaster, drywall and joint compounds, roofing materials, textured paint and coatings, sheet flooring, and vent cloth on ducting. Samples taken of suspected ACM during the survey returned positive results for asbestos. **Table 6.8-3, Areas with Identified Asbestos-Containing Materials**, lists the areas sampled during the asbestos survey that returned a positive result for ACM.

Table 6.8-3
Areas with Identified Asbestos-Containing Materials

Location	Type of Material	Results	Friability	Estimated Quantity
Bony Dorm, Room B115	Tan tile Black mastic	5% Chrysolite 3% Chrysolite	Nonfriable	Most of the building
Prayer Hall	Tan tile Black mastic	5% Chrysolite 3% Chrysolite	Nonfriable	3,853 square feet
Prayer Hall	Paint/coating	Trace Chrysolite	Nonfriable	Not determined
Classroom, Faculty Room B105	Tan/black mastic	5% Chrysolite	Nonfriable	1,000 square feet
Classroom, Rooms B215, 217, 218	Beige tile Black mastic	3% Chrysolite	Nonfriable	1,000 square feet per room
Classroom, Room B202	Beige tile Black mastic Brown mastic	3% Chrysolite Trace Anthophyllite	Nonfriable	125 square feet
Chapel, Room C107	Off-white tile Tan mastic	3% Chrysolite	Nonfriable	1,000 square feet (includes all areas covered by this tile)
Refectory/Kitchen, Room D101	Beige tile Black mastic	3% Chrysolite	Nonfriable	6,900 square feet
Refectory/Kitchen, Tan with White/Brown, Room D101	Black mastic	3% Chrysolite	Nonfriable	200 square feet
Convent, Room D152	Tan tile Black mastic	5% Chrysolite 3% Chrysolite	Nonfriable	Not determined (likely most of the building, which is carpeted)
Library, 2 nd Floor, Room 204	Tan tile Black mastic	3% Chrysolite	Nonfriable	4,700 square feet
Library Basement, Hallway	White fibrous material on vent ducting	90% Chrysolite	Friable	Not determined
Library roof	Black felts	35% Chrysolite	Nonfriable	7,175 square feet
Library roof	Roof mastic – black semifibrous tar	10% Chrysolite	Nonfriable	Various roof areas
Admin, Copy Room	Tan tile Black mastic	5% Chrysolite	Nonfriable	Likely most of the building
Admin, Kitchen, 2 nd Floor	Fibrous backing	70% Chrysolite	Nonfriable	200 square feet
Admin, Supply Closet, 2 nd Floor	Tan tile Black mastic	5% Chrysolite	Nonfriable	Likely most of the building
Bony Dorm, 2 nd Floor, in B215	Tan tile Black mastic	5% Chrysolite	Nonfriable	Most of the building
Paul Dorm, 2 nd Floor, Closet	Tan tile Black mastic	5% Chrysolite 5% Chrysolite	Nonfriable	Most of the building

Source: West Coast Environmental and Engineering 2004.

The following areas were sampled and returned a negative result for ACM:

- Baseboard mastics in dorms, prayer hall, and chapel
- Ceiling tiles in dorms, classrooms, and the recreation building, chapel, kitchen, convent, library, and administration building
- Tape joint materials in classrooms
- Vent wrapping in the mechanical room of the recreation building (Room B104) and in the kitchen area (Room D106)
- Linoleum flooring in the recreation building laundry room (Room B105)
- Plaster materials in the recreation building janitor's closet (Room B109), classroom (Room B202), chapel, kitchen area, administration building (copy room and Room M4), and Vibiana Dorm
- Ceiling tile mastic in Paul Dorm (near Room P111)

Samples of roofing materials were taken only at the library building. The asbestos survey concluded that, given the positive result for the library roof, the roofs of the other buildings should be assumed to have ACM present. Similarly, given the positive result for the cloth ducting sampled in the hallway basement of the library building, the asbestos survey report notes the possibility of other area of ducting in this and other buildings on the site. Transite pipe (an ACM) was noted in the pool pump room at the bathhouse building. Finally, the majority of the pipe and boiler wrapping noted in the boiler room, dorms, kitchen, and other buildings had been replaced, but residual ACM may exist in these areas, including cloth ducting, transite pipe, and block insulation.

Lead-Based Paint

A survey for lead-based paint was conducted on the proposed project site in October 2004.²¹ **Table 6.8-4, Areas with Identified Lead-Based Paint**, list the results of the survey.

All of the lead-based paint identified was intact and in good condition at the time of the survey.

Table 6.8-4
Areas with Identified Lead-Based Paint

Building	Location	Type of materials	Quantity
Dormitory #1	1 st and 2 nd floor bathrooms	Ceramic tile walls and baseboards	3,000 square feet
Dormitory #2	1 st and 2 nd floor bathrooms	Ceramic tile walls and baseboards	3,000 square feet

²¹ McKenna Environmental, *Lead Investigation Report*, 2004.

Building	Location	Type of materials	Quantity
Dormitory #3	1 st and 2 nd floor bathrooms	Ceramic tile walls and baseboards	3,000 square feet
Administration Building #4	1 st and 2 nd floor bathrooms	Ceramic tile walls	1,700 square feet
Classroom/Recreation Building B	Basement and 1 st floor restrooms	Ceramic tile walls	650 square feet
Chapel Building C	Main floor restroom	Ceramic tile walls	100 square feet
Kitchen/Convent Building D	Main floor restrooms and bathroom	Ceramic tile walls	1,050 square feet
Carport Building E	Main floor bathroom	Ceramic tile walls	150 square feet
Bathhouse	Main floor bathroom	Ceramic tile walls	400 square feet

Source: McKenna Environmental 2004.

Agricultural Chemicals

Given the history of agricultural use on the proposed project site, the potential exists for agricultural chemicals to remain in on-site soils. Higher concentrations of chemicals in soils are generally associated with storage and mixing operations and localized to long-term farm staging areas. Several areas of this kind potentially exist on the proposed project site. Residual concentrations of agricultural chemicals tend to be relatively uniform, low in concentration, and confined to the upper 2 feet of soil (the typical depth of agricultural disturbance) over areas of routine application. Even low, uniform concentrations may exceed regulatory guidelines for certain land uses.

Wildfire Hazard

The City of Camarillo Municipal Code defines a high fire hazard area as:

*an area within 500 feet of uncultivated brush, grass, or forest-covered land when designated as such by the [Ventura County Fire Protection] District, based upon a determination by District that a potential fire hazard exists due to the presence of such flammable growth.*²²

No land within the proposed project site and the surrounding area is designated as within a Very High Fire hazard Severity Zone on state wildfire hazard maps (refer to **Figure 6.13-2, CalFIRE Very High Fire Hazard Severity Zones**). The *City of Camarillo General Plan Safety Element, Exhibit 11-7: High Fire Hazard*

²² City of Camarillo, Municipal Code, Section 16.04.125.

Zones, indicates that the project site has a low fire hazard and but is adjacent to areas of Very High Fire Hazard (refer to **Figure 6.13-3, City of Camarillo High Fire Hazard Zones**).²³

Access to the St. John' Seminary site is currently provided from Upland Road via Seminary Road. No secondary access exists.

6.8.6 THRESHOLDS OF SIGNIFICANCE

In order to assist in determining whether a project will have a significant effect on the environment, the *California Environmental Quality Act (CEQA) Guidelines*, City of Camarillo Threshold Guidelines (adopted from the *State CEQA Guidelines*, Appendix G) identify criteria for conditions that may be deemed to constitute a substantial or potentially substantial adverse change in physical conditions.

Under the following thresholds, a project may be deemed to have a significant impact if it would

1. Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials;
2. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school;
4. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to government code section 65962.5 and, as a result, would it create a significant hazard to the public or the environment;
5. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, result in a safety hazard for people residing or working in the project area;
6. For a project within the vicinity of a private airstrip, result in a safety hazard for people residing or working in the project area;
7. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or

²³ City of Camarillo, *City of Camarillo General Plan, "Safety Element,"* (2013) 11.25.

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

6.8.7 ENVIRONMENTAL IMPACTS

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

Impacts

Construction

Grading and construction activities are associated with certain routine hazardous materials including fuel, building materials, and paint. No acutely hazardous materials would be routinely transported to, used on, or disposed of on the proposed project site. The lead paint and asbestos surveys conducted for the proposed project identified quantities of ACM and lead-based paint in existing structures on the proposed project site.²⁴ Removal of these substances prior to demolition would pose a potentially significant impact.

Demolition activities would result in the removal of ACM and lead-based paint from the site. Under VCAPCD Rule 62.7, notification would be provided to VCAPCD prior to removal of ACM, along with information on the amount of ACM to be removed and plans for storage and disposal of ACM. All removal of ACM would be conducted by a licensed asbestos removal contractor using approved techniques and equipment and would be subject to the emissions requirements of VCAPCD Rule 62.7.

Lead-based paint would be removed and disposed of by a licensed lead removal contractor using approved techniques and equipment subject to the requirements of CCR Sections 1532.1 et seq. and 35001 et seq.

The County of Ventura *Hazardous Materials Business Plan* (HMBP) provides regulations for disposal of hazardous materials using approved haul routes.²⁵ The presence of hazardous materials associated with demolition and construction activities on the proposed project site would be subject to stringent regulation and would be temporary. Compliance with all applicable regulations would reduce impacts to less than significant.

²⁴ West Coast Environmental and Engineering, *Results of Asbestos and Lead Paint Survey*, 2004.

²⁵ County of Ventura, Certified Unified Program Agency, Hazardous Materials Program, website: <http://www.vcrma.org/envhealth/cupa/index.html>. November 2016

Operation

The proposed project would provide 300 units of senior citizen housing development. During project operation, typical household chemicals such as cleaning solvents would be used in the project residences. However, these products do not pose a substantial risk to people or property and are not likely to be hazardous to the environment if correctly disposed of. Operational impacts for hazards and the use of hazardous substances by the project site would not have the potential to result in significant impacts associated with the transportation, use, or disposal of these household chemicals. The City of Camarillo maintains a household hazardous waste program that provides for the disposal of these materials. Impacts would be less than significant.

Regulatory Compliance Measures

- 6.8-1:** Prior to the issuance of demolition permits, a licensed asbestos assessment contractor shall conduct a study of all on-site structures to identify all asbestos-containing materials, and submit a report presenting the findings of the study to the City of Camarillo for review and approval. Furthermore, all asbestos-containing materials shall be removed by a licensed asbestos removal contractor according to the requirements of VCAPCD Rule 62.7. Certification of removal shall be approved by VCAPCD or the City of Camarillo prior to demolition of any existing structure.
- 6.8-2:** Prior to the issuance of demolition permits, a licensed lead-based paint assessment contractor shall conduct a study of all on-site structures to identify all lead-based paint, and submit a report presenting the findings of the study to the City of Camarillo for review and approval. All lead-based paint materials shall be removed by a licensed lead-based paint removal contractor according to the requirements of CCR Sections 1532.1 et seq. and 35001 et seq. Certification of removal shall be approved by the City of Camarillo prior to demolition of any existing structure.

Residual Impacts

Impacts would be less than significant.

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.

Impacts

Construction

Existing structures on the proposed project site contain both ACM and lead-based paint. As part of the demolition of these structures, these hazardous materials would be removed and disposed of by a licensed contractor, in accordance with VCAPCD Rule 62.7 and state lead-based paint regulations.²⁶

Construction of the proposed project would involve the routine use and transport of hazardous materials such as fuel, building materials, and paint. No acutely hazardous materials would be used or transported.

The County of Ventura HMBP provides regulations for disposal of hazardous materials using approved haul routes. The presence of hazardous materials associated with demolition and construction activities on the proposed project site would be subject to stringent regulation and would be temporary. Compliance with all applicable regulations would reduce impacts to less than significant.

Operation

During operation of the project, typical household chemicals such as cleaning solvents would be used and stored within residences, but would not present a significant threat of accidental release. The City of Camarillo holds monthly household hazardous waste collection events, which afford City residents an opportunity to safely dispose of household chemicals. The General Plan also contains programs for the implementation of permanent household hazardous waste drop-off sites, public education on source reduction and proper disposal, and the development of revenue sources to expand household hazardous waste programs. The project site has not been involved with the use of radioactive materials, and does not pose a release or explosion threat to residents. Therefore, impacts would be less than significant in regard to a risk of accidental explosion or release of hazardous substances.

Mitigation Measures

No mitigation is required.

²⁶ California Code of Regulations, Sections 1532.1 et seq. and 35001 et seq.

Residual Impacts

Impacts would be less than significant.

Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school.

Impacts

Construction

The nearest public school, La Mariposa Elementary, is approximately 0.4 mile from the project site. The existing St. John's Major Seminary is located within 0.25 mile of the proposed project site. No new schools are proposed within 0.25 mile of the proposed project site.

Demolition of existing structures on the proposed project site would require the removal of ACM and lead-based paint. Removal and transportation of these hazardous materials within 0.25 mile of the existing St. John's Seminary would be a potentially significant impact. As part of the demolition of the existing structures, these hazardous materials would be removed and disposed of by a licensed contractor, in accordance with VCAPCD Rule 62.7 and state lead-based paint regulations.²⁷

Construction of the proposed project would involve the routine use and transport of hazardous materials such as fuel, building materials, and paint. No acutely hazardous materials would be used or transported. Emissions from construction of the proposed project are further discussed in **Section 6.3, Air Quality**.

Compliance with all applicable regulations would reduce impacts to less than significant.

Operation

The residential uses proposed on the project site would not emit hazardous emissions or result in the use of any acutely hazardous materials. Typical household chemicals such as cleaning products would be used and stored on the project site, but these substances would not present a significant risk to adjacent uses. Impacts would, therefore, be less than significant.

Mitigation Measures

No mitigation is required.

²⁷ California Code of Regulations, Sections 1532.1 et seq. and 35001 et seq.

Residual Impacts

Impacts would be less than significant.

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, create a significant hazard to the public or the environment.

Impacts

Construction

The long-term agricultural use of the site indicates the potential for agricultural chemicals in on-site soils. Given the potential for chemical contamination of site soils, impacts related to existing site conditions would be potentially significant.

One on-site well was drilled in 1984 in the general vicinity of the water tank located in the southeastern portion of the site. This well did not produce any significant quantities of oil and was abandoned in the same year. Construction and grading activities may disturb the well, which would be a potentially significant impact. Implementation of **Mitigation Measure 6.8-3** would ensure proper soil sampling before the issuance of any grading permits. This measure would establish a remediation process in the event of uncovering contaminated soils on the project site.

Operation

All existing conditions on the proposed project site will be subject to remediation during project construction. Impacts would, therefore, be less than significant.

Regulatory Compliance Measure

The following mitigation shall be implemented:

- 6.8-3:** Prior to the issuance of grading permits, soil sampling shall be conducted in areas where agricultural activities have historically occurred, or where agricultural chemicals have been stored, to characterize any residual agricultural chemicals. If sampling identifies contaminated soils, such soils shall be remediated subject to the approval of the City of Camarillo and/or VCEHD.

Residual Impacts

Impacts would be less than significant.

For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, result in a safety hazard for people residing or working in the project area.

Impacts

The proposed project site is not located within an airport use plan or within two miles of a public airport or public-use airport. The nearest public airport is Camarillo Airport, located approximately four miles southwest of the proposed project site. Impacts would, therefore, be less than significant.

Mitigation Measures

No mitigation is required.

Residual Impacts

Impacts would be less than significant.

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

Impacts

The proposed project site is not located within the vicinity of a private airstrip. The nearest aviation facility is Camarillo Airport, located approximately four miles southwest of the proposed project site. Impacts would therefore be less than significant.

Mitigation Measures

No mitigation is required.

Residual Impacts

Impacts would be less than significant.

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

Impacts

Construction

Vehicular access to the proposed project site would be provided via a new main entrance on Upland Road. Secondary access would be provided via Seminary Road (past the St. John's Major Seminary) to Upland Road. Development of the primary access roads would be subject to the requirements of VCFPD Standard 14.6.4, which requires both primary and secondary access roads be at least 24 feet wide within a minimum 30-foot easement. The fire access plan for the proposed project showing primary and secondary access alignments and design standards has been submitted to, and approved by, the City Planning Department and VCFPD.

Operation

As previously discussed, vehicular access to the proposed project site would be provided via a main entrance from Upland Road, with secondary access provided via Seminary Road to Upland Road. Primary access is designed to meet VCFPD standards. The fire access plan for the proposed project showing primary and secondary access alignments and design standards has been submitted to, and approved by, the City Planning Department and VCFPD.

The General Plan does not identify evacuation routes for fire, as these would necessarily be determined according to unpredictable fire conditions.²⁸ The areas near the proposed project site, north of Highway 101 and east of Calleguas Creek identified as the flood plain during a breach of Bard Reservoir, would be subject to evacuation (refer to **Figure 6.6-5, Dam Inundation Areas**). During a breach of the Bard Reservoir, evacuation routes would generally be toward higher ground and out of the flood plain. In the event of a chemical spill or other significant disaster, City-designated evacuation routes would be Highway 101 for evacuation to the east or west and Lewis Road for evacuation to the north or south.²⁹ The proposed project would, therefore, not impair the implementation of or interfere with an adopted emergency response plan or evacuation plan. Impacts would be less than significant.

²⁸ City of Camarillo, *City of Camarillo General Plan, "Safety Element,"* (2013).

²⁹ City of Camarillo, *City of Camarillo General Plan, "Safety Element,"* (2013), 11.49.

Mitigation Measures

No mitigation is required.

Residual Impacts

Impacts would be less than significant.

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

Impacts

The proposed project site is surrounded by and contains agricultural and urbanized land uses. Existing agricultural uses on the proposed project site would be removed and replaced with irrigated landscaping, roads and paved areas, and residential uses. As indicated in **Section 6.13, Public Services – Fire Protection**, the proposed project site does not contain any areas designated as having high fire hazard on state wildfire hazard maps. Refer to **Figure 6.13-2, CalFIRE Very High Fire Hazard Severity Zones**, and **Figure 6.13-3, City of Camarillo High Fire Hazard Zones**, for a depiction of fire hazard designations in the project vicinity.

Development of the proposed project would be subject to VCFPD requirements for access, water supplies, and fire protection systems. All structures constructed as part of the proposed project would contain automatic fire suppression systems, and fire protection facilities would be subject to review and approval by VCFPD. **Section 6.13, Public Services – Fire Protection**, analyzes fire hazards on the proposed project site and provides mitigation measures to reduce the significance of potential impacts.

Mitigation Measures

The project shall implement **Mitigation Measures 6.13-1 through 6.13-6**.

Residual Impacts

Impacts would be less than significant.

6.8.8 CUMULATIVE ANALYSIS

Impacts

The hazards impacts associated with a proposed project usually occur on a project-by-project basis rather than cumulatively. Because project implementation would comply with regulatory controls to abate site-specific hazards, any potential cumulative impacts associated with the project are expected to be decreased, as the harmful substances will have been removed from the site. Cumulative impacts associated with the proposed project are, therefore, considered less than significant.

The issues of placing cumulative residential units near wildfire hazard areas are cumulative, due to evacuation and emergency egress, and the possible traffic impacts that may occur if dense developments were evacuated simultaneously. The proposed project offers an emergency route for the sole purpose of emergency egress that would help offset the amount of vehicles using the primary route out of the project site. Furthermore, traffic impacts identified in **Section 6.18** indicate that emergency vehicle impacts would be less than significant. The cumulative impact of the project site on wildfire hazards would be considered less than significant.

Mitigation Measures

No mitigation is required.

Residual Impacts

Impacts would be less than significant.

6.8.9 CONSISTENCY WITH GENERAL PLANS

The *City of Camarillo General Plan Safety Element*³⁰ provides the following applicable goals and policies for hazards and hazardous materials. An analysis of the consistency of the proposed project with each of the applicable goals, objectives, and policies is provided below.

Policy SAF-1.1b Review public safety infrastructure and staff resources as new development is planned or proposed within the City of Camarillo Planning Area.

³⁰ City of Camarillo, *City of Camarillo General Plan, "Safety Element,"* 2013.

Analysis: The proposed project would be subject to review and approval by City and by County agencies regulating hazards. The proposed project, therefore, would not conflict with this policy.

Policy SAF-5.1a Promote the handling of hazardous wastes and hazardous materials so that waste reduction through alternative technology is the first priority, followed by recycling and on-site treatment, with disposal as the last resort.

Analysis: The proposed project consists primarily of residential uses, and would, therefore, be expected to include only household chemicals such as cleaning products. The City of Camarillo holds monthly household hazardous waste collection events, which afford City residents an opportunity to safely dispose of household chemicals. The proposed project, therefore, would not conflict with this policy.

Policy SAF-5.1c Locate potentially hazardous facilities and operations in areas that would reduce exposure of the public to a significant risk of injury, loss of life, or property damage.

Analysis: Existing hazardous waste on the proposed project site, including asbestos-containing materials, lead-based paint, and contaminated soils, have been identified in a Phase 1 ESA and an asbestos and lead-paint survey, as described in Section 6.8.3. The waste would be removed in accordance with the requirements of regulatory agencies. Hazardous wastes would be transported using City-designated haul routes. The proposed project, therefore, does not conflict with this policy

Policy SAF-5.1d Raise public awareness of appropriate disposal for household hazardous waste, and publicize collection events and locations.

Analysis: The proposed project consists primarily of residential uses, and would, therefore, be expected to include only household chemicals such as cleaning products. The City of Camarillo holds monthly household hazardous waste collection events, which afford City residents an opportunity to safely dispose of household chemicals. The proposed project, therefore, would not conflict with this policy.

Policy SAF-5.2a Require new development that will generate hazardous wastes or utilize hazardous materials to identify hazardous waste reduction, recycling, and storage areas on site plans

Analysis: The proposed project consists primarily of residential uses, and would, therefore, be expected to include only household chemicals such as cleaning products. The City of Camarillo holds monthly household hazardous waste collection events, which afford City residents an opportunity to safely dispose of household chemicals. The proposed project, therefore, would not conflict with this policy.

Policy SAF-5.2b Ensure that land uses involved in the production, storage, handling, or disposal of hazardous materials are located and operated to reduce risk to other land uses.

Analysis: The proposed project consists primarily of residential uses, and would, therefore, be expected to include only household chemicals such as cleaning products. The City of Camarillo holds monthly household hazardous waste collection events, which afford City residents an opportunity to safely dispose of household chemicals. The proposed project, therefore, would not conflict with this policy.

Policy SAF-5.2e Designate appropriate transportation routes for the movement and transport of hazardous materials within and throughout the City.

Analysis: Existing hazardous waste on the proposed project site, including asbestos-containing materials, lead-based paint, and contaminated soils, would be removed in accordance with the requirements of regulatory agencies. Hazardous wastes would be transported using City-designated haul routes. The proposed project, therefore, does not conflict with this policy

Policy SAF-5.3d Develop an educational awareness program for residents and businesses about the dangers of hazardous materials and proper disposal methods

Analysis: The City of Camarillo holds monthly household hazardous waste collection events, which afford City residents an opportunity to safely dispose of household chemicals. The proposed project, therefore, would not conflict with this policy.

Summary

The proposed project is consistent with the City's General Plan.