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STATE CLEARINGHOUSE

March 25, 2019

Ms. Andrea Gilbert
City of Chino
13220 Central Avenue
Chino, California 91710

DRAFT ENVIRONMENTAL IMPACT REPORT FOR CHINO PARCEL DELIVERY FACILITY, CHINO (SCH NO. 2016121057)

Dear Ms. Gilbert:

The Department of Toxic Substances Control (DTSC) reviewed the Draft Environmental Impact Report (Draft EIR), dated February 2019, for Chino Parcel Delivery Facility, located south of Merrill Avenue and west of Flight Avenue, in the city of Chino.

The project proposes demolition of the existing residential and agricultural/dairy buildings and construction and operation of a parcel delivery facility on a 74.4-acre-land. The western portion of the site is occupied by two (2) residences, a dairy farm with approximately 700 head of cattle, and several agricultural support buildings (e.g., cattle pens and structures for shelter, feed, and water). The eastern portion of the site contains cultivated fields used to grow cattle feed.

DTSC's comments on the Draft EIR, Section 4.8., Hazards and Hazardous Materials, are as follows:

1. Section 4.8.4.A.3., Building Materials, Page 4.8-11 - The project site contains structures (including residential buildings) known to be constructed before 1978. Asbestos containing materials (ACMs) and lead based paint (LBP) may be present in these structures. Please include in this section that a survey and inspection by an accredited professional will be conducted prior to the structures demolition. If ACMs and LBP are identified, all building materials should be characterized and disposed of in accordance with all applicable laws and regulations.

2. Section 4.8.4.A 5, Pesticides, Page 4.8-12 – DTSC disagrees that organochlorine pesticides (OCPs) do not pose any risk to human health and the environment based on the rate of degradation and potential low concentration of pesticides used at the project site. These statements should be removed and replaced with sentences to indicate that the potential former use of OCPs at the project site is a recognized environmental condition (REC), and soil investigation is warranted. DTSC recommends that soil be investigated for agriculture related chemicals such as metals (lead and arsenic) and OCPs in accordance with DTSC's Interim Guidance for Sampling Agricultural Fields that are proposed for School Sites (<https://dtsc.ca.gov/assessingRisk/upload/Sampling-Ag-Fields-for-Schools.pdf>)

DTSC recommends that soil investigation, and remedial actions if necessary, should be conducted under workplans approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous substance cleanup.

3. Threshold d, Page 4.8-14 – Although the site is not located on any list of hazardous materials sites compiled pursuant Government Code Section 65962.5, the former use of the project site as an agricultural land is a REC. Soil investigation is needed as discussed in Comment 2. In addition, the Phase 1 Environmental Site Assessment (Phase 1 ESA) Report indicates that a release of oil and/or hazardous substances occurred in 2017 according to the Federal Emergency Response Notification System. The Draft EIR should specify the chemicals, quantity and location of the releases to assess whether the release is a REC. If such information is not available, a soil management plan should be prepared in case soil contamination is identified during the soil disturbance activities. DTSC recommends that this section be revised to discuss potential soil contamination associated with the former agricultural use and hazardous substances release and potential hazard associated with soil disturbance activities.
4. Section 4.8.7 Mitigation, Page 4.8-17- MM 4.8-1 shall also include long-term methane gas monitoring if soil gas mitigation measures (e.g., sub slab vapor barrier, sub-slab vent) are proposed in the project construction designs.
5. Appendix H2- DTSC disagrees with statements made in this appendix (e.g., Bullets 4 to Bullets 10 on Page 1). DTSC has been involved in overseeing investigation and remediation of several sites that were formerly used for agriculture. OCPs are highly persistent in the environment and may be present in soil at levels that pose significant risk to human health, ecological receptors and the environment. Re-distribution of the OCP contaminated soil across the site is an illegal treatment of hazardous waste. DTSC recommends the project site be investigated in accordance with DTSC's guidance mentioned in Comment 2. DTSC also recommends Appendix H2 be removed from draft EIR as it is not

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an appropriate supplemental document to Phase I ESA and presents misleading information.

DTSC appreciates the opportunity to review the Initial Study. Should you need any assistance in environmental investigation, please submit a request for Lead Agency Oversight Application which can be found at <https://www.dtsc.ca.gov/SiteCleanup/Brownfields/voluntary-agreements-guide.cfm>.

Should you have any questions regarding this letter, please contact me at (714) 484-5392 or by email at ChiaRin.Yen@dtsc.ca.gov.

Sincerely,



Chia Rin Yen
Environmental Scientist
Brownfields Restoration and School Evaluation Branch
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ar/cy/yg

cc: (via e-mail)

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