

## CALIFORNIA ENVIRONMENTAL QUALITY ACT INITIAL STUDY

The Department of Toxic Substances Control (DTSC) has completed the following document for this project in accordance with the California Environmental Quality Act (CEQA) [Pub. Resources Code, div. 13, § 21000 et seq] and accompanying Guidelines [Cal. Code Regs., tit. 14, § 15000 et seq].

PROJECT TITLE: Rho-Chem Corrective Measures		SITE CODING: 300226
PROJECT ADDRESS: 425 Isis Avenue	CITY: Inglewood	COUNTY: Los Angeles
PROJECT SPONSOR: Cemex, Inc. and Rho-Chem, LLC	CONTACT: Brian Mastin	PHONE: 909-239-7451
APPROVAL ACTION UNDER CONSIDERATION BY DTSC:  <input type="checkbox"/> Initial Permit Issuance <input type="checkbox"/> Permit Re-Issuance <input type="checkbox"/> Permit Modification <input type="checkbox"/> Closure Plan <input type="checkbox"/> Removal Action Workplan <input type="checkbox"/> Remedial Action Plan <input type="checkbox"/> Interim Removal <input type="checkbox"/> Regulations <input checked="" type="checkbox"/> Other (specify): Corrective Measures Study Report		
STATUTORY AUTHORITY:  <input checked="" type="checkbox"/> California H&SC, Chap. 6.5 <input type="checkbox"/> California H&SC, Chap. 6.8 <input type="checkbox"/> Other (specify):		
DTSC PROGRAM/ADDRESS: 9211 Oakdale Avenue, Chatsworth, CA 91311	CONTACT: Patrick Movlay	PHONE: 818-717-6542
PROJECT DESCRIPTION: <p>Pursuant to the Corrective Action Consent Agreement (CACA), the Department of Toxic Substances Control (DTSC) is proposing to select remedies recommended in a Corrective Measure Study (CMS) Report prepared by Cemex, Inc. and Rho-Chem, LLC (formerly known as Rho-Chem Corporation; Rho-Chem), collectively the Respondents, for the the Rho-Chem facility (site or facility). The CMS Report was required by the CACA, docket number HWCA P3-01/02-005, effective in November 25, 2002. The CACA was issued pursuant to the California Health and Safety Code, section 25187, which requires the owner/operator to clean up any spill, hazardous substances, and/or contaminants found at and adjacent to the site. Selecting the remedies would allow the Respondents to implement the corrective measures (CM) recommended in the CMS Report and obtain a Corrective Action Complete without Controls determination from DTSC for the site.</p> <p><b>Background</b></p> <p>Rho-Chem is a Resource Conservation and Recovery Act (RCRA)-equivalent Hazardous Waste Management Facility which is permitted under RCRA Part B to store, treat, transfer, and recycle hazardous wastes (Permit; United States Environmental Protection Agency [EPA] ID Number CAD008364432, effective August 28, 2008). The Rho-Chem facility is located at 425 Isis Avenue in the City of Inglewood, California, which is on an estimated 1.1-acre parcel of a predominantly industrial and commercial area approximately 1.5 miles north of the Los Angeles International Airport.</p> <p>Company operations began in about 1951 as American Better Chemicals (Brown and Caldwell, 1989) and operation at the site began in June 1953. Initial operations included the bulk storage and distribution of oils, lubricants, and solvents. The facility began recycling waste solvents in 1964. In 1974, the facility became the Rho-Chem Corporation, which handled and distributed virgin solvent (Brown and Caldwell, 1989).</p> <p>Current site operations include hazardous waste transfer, storage, and consolidation; laboratory packing/de-packing; liquid fuel blending; solvent recycling; and solvent distribution (DTSC, 2008). The current Permit authorizes the operation of eight hazardous waste management units and one proposed storage container as listed below:</p>		

- Area A—Drum Yard,
- Area B—Tank Farm,
- Area C—Fractionation Column System
- Area E—Thin Film Evaporation System and Batch Distillation System, and
- Areas F, G, J, and H—Container Storage (includes the one proposed storage container [i.e., Area H]).

Rho-Chem is also a registered hazardous waste transporter (DTSC, 2008). The incoming bulk chemicals are received by tank truck and unloaded into aboveground storage tanks (ASTs). Historically, incoming chemicals were also unloaded into underground storage tanks (USTs). Currently, only ASTs are used to store chemicals at the site, because the USTs have either been removed or closed in-place. Reclaimed solvents are subsequently shipped to clients in bulk or in containers ranging in size from 1 to 55 gallons (Ecology and Environment, 1988; DTSC, 2008). More detailed information about historical and current waste receiving, treatment, and management practices can be found in the Phase IV RCRA Facility Investigation (RFI) Report (AMEC Geomatrix, 2010a) and the current Permit (DTSC, 2008).

Numerous investigations of soil, soil vapor, and groundwater conditions have been conducted at the site and in the near vicinity of the site. Together, the Current Conditions Report (CCR; Geomatrix, 2009), the Phase IV RFI (AMEC Geomatrix, 2010a), the Human Health Risk Assessment (HHRA) Work Plan (Amec Foster Wheeler, 2015), Groundwater Pilot Study (AMEC, 2014; Amec Foster Wheeler, 2016a), and CMS (Amec Foster Wheeler, 2018) provide a comprehensive summary of previous investigations. In addition, a soil vapor extraction (SVE) interim measure (IM) is ongoing to reduce constituents of concern (COCs) mass within the on-site source areas. Operation of the SVE system began in July 2011.

Historical investigations and groundwater monitoring at the site have identified volatile organic compounds (VOCs) as the primary COCs in soil, soil vapor, and groundwater, with PCE and TCE as the predominant VOCs (Geomatrix, 2008; AMEC Geomatrix, 2010a and 2010b; Amec Foster Wheeler, 2018). In addition, these two compounds contribute to the majority of the human health risks as determined from the screening level HHRA (Amec Foster Wheeler, 2016b). The extent of COCs in soil, soil vapor, and groundwater is described in the CMS Report (Section 5.0; Amec Foster Wheeler, 2018).

The CMS includes a proposal to reduce the mass of COCs in the soil, soil vapor, and semi-perched aquifer (also referred to as the Water Table Groundwater Zone) underlying the site. However, achieving maximum contaminant level (MCL)-based drinking water standards in impacted groundwater may not be feasible, and performance-based remedial goals for groundwater may be required. Restoration of groundwater quality to drinking water standards may not be feasible due to hydrogeologic conditions at the site and/or the presence of other off-site sources of VOCs to soil and groundwater that are unrelated to COC impacts at the site. Performance-based remedial goals for groundwater, including soil and soil vapor, will be protective of human exposure and protection of groundwater to the greatest extent possible within the constraints posed by physical, chemical, and geologic factors at the site.

### **Project Activities**

With DTSC approval, the CMS recommends implementation of the following elements to control and/or limit existing soil, soil vapor, and semi-perched aquifer contamination at the site:

- land use controls;
- containment;
- Soil vapor extraction (SVE);
- hydraulic property boundary containment;
- on-site enhanced reductive dechlorination (ERD)/in-situ chemical oxidation (ISCO) recirculation;
- off-site groundwater extraction (GWE); and
- monitored natural attenuation (MNA).

### Land Use Controls

The recommended land use control includes a land use covenant (LUC) to restrict future site use and to minimize the potential for impact on human health and the environment. Provisions of the LUC may include:

- restriction on land development and use until relevant Corrective Action Objectives (CAOs)/Corrective Action Standards (CASs) are achieved;
- management of any excavated or exposed native soil in accordance with a DTSC approved soil management plan (SMP);
- restriction on groundwater use until relevant CAOs/CASs are achieved; and
- inspection and operation and maintenance (O&M) of remedial measures in accordance with a DTSC approved O&M Plan.

### Containment

Capping, while not meeting CAOs/CASs, is currently effectively mitigating risks associated with human contact with impacted soils and preventing or minimizing the vertical migration of COCs to underlying soil and groundwater. Capping should be maintained as an existing, complementary technology to other selected Corrective Measure (CM) alternative vadose zone technologies and should remain in-place until CAOs/CASs are achieved in the vadose zone. This element requires that the existing surface features (asphalt, concrete, building foundations) should be routinely inspected, repaired, and replaced as needed.

Sub-slab depressurization (SSD), while not meeting CAOs/CASs, is occurring as a result of SVE operations ongoing at the site and is effectively mitigating risks associated with vapor intrusion in on-site human occupied buildings. SSD should be maintained as an existing, complementary technology to other selected CM alternative vadose zone technologies and should remain in-place until CAOs/CASs are achieved in the vadose zone.

### Soil Vapor Extraction

SVE is ongoing as an IM at the site where it is currently extracting soil vapor from the vadose zone through an extraction well network consisting of 56 SVE wells. As a component of the selected CM alternative, the SVE system would be operated as the final remedial measure for vadose zone soil remediation and for protection of human health in on-site human occupied buildings (as an SSD system).

SVE data indicates that SVE is an effective source zone remedial technology as evidenced by its vacuum coverage and removal of over 119,000 pounds of VOCs from vadose zone soils since technology implementation. Soil vapor data from vapor monitoring probes indicates that currently and historically SVE is effectively remediating the entire lateral and vertical extent of the source zone and that extraction from shallow SVE wells is effectively acting as a SSD system and preventing soil vapor from leaving the subsurface and potentially infiltrating on-site human occupied buildings.

Under the selected CM alternative, SVE will continue to operate until concentrations of COCs in soil are reduced so that, in the absence of SVE, soil no longer provides a vapor risk in on-site human occupied buildings, human contact with soils no longer poses a risk and leaching to groundwater is no longer a threat to groundwater quality. The SVE system will continue to operate under its current configuration until influent soil vapor concentrations decrease to a level at which vapor phase granular activated carbon (VGAC) is a more cost-effective abatement technology. Additional SVE wells may be added to the existing network should soil vapor impacts be observed that are not currently being affected by the existing SVE well network.

### Hydraulic Property Boundary Containment

As a component of the selected CM alternative, GWE wells would be installed at, or very near, the northern and/or eastern boundaries of the site, hereafter referred to as "property boundary containment wells". The property boundary containment wells will be designed and installed to:

1. Provide hydraulic containment of dissolved-phase COCs in groundwater in the downgradient direction from the two former UST areas. The property boundary containment wells, after reaching hydraulic equilibrium, would

- prevent the lateral and/or vertical expansion of COC impacts in groundwater by extracting COC-impacted groundwater as it flows toward the downgradient property boundary.
2. Extract groundwater with dissolved phase VOC impacts within the hydraulic capture radius of each property boundary containment well.
  3. Induce an upward or, at a minimum, neutral vertical groundwater gradient to prevent impacts to the underlying Gage Aquifer.
  4. Increase the dissolution rate of soil sorbed mass in the saturated zone by inducing quicker groundwater flow through impacted saturated soils when compared to natural groundwater flow conditions.

Extracted groundwater would be pumped to an aboveground treatment system which utilizes bag and/or cartridge filters for particulate filtration followed by granular activated carbon (AGAC) for VOC abatement. Treated groundwater would be discharged either to a publicly owned treatment works (POTW) sewer or re-injected under a Waste Discharge Requirement (WDR) permit program. Groundwater reinjection may also be used as an enhancement to this technology to assist in controlling groundwater gradients and/or to create a groundwater recirculation system.

Under the selected CM alternative, GWE will continue to operate until concentrations of COCs in groundwater are reduced so that, in the absence of GWE, MNA is demonstrated to be appropriate.

#### On-Site ERD/ISCO Recirculation

As a component of the selected CM alternative, injection wells would be installed adjacent to the western site property boundary in the former, primary UST area. The injection wells would be used to inject extracted groundwater treated by filters and AGAC as well as extracted groundwater amended with persulfate or an appropriate bio-amendment.

These injection wells will be designed and installed to:

- Inject extracted groundwater to promote groundwater recirculation and an enhanced hydraulic gradient beneath the site and the adjacent transfer station.
- Inject persulfate or bio-amendment to increase dissolution rates of soil sorbed COCs in the former UST area.
- Inject persulfate or bio-amendment to target dissolved-phase COCs present beneath the site and the adjacent transfer station.

GWE wells will be installed along the eastern site boundary and the western boundary of the transfer station to work in concert with the injection wells. Additional GWE wells may be installed along the periphery of the site and transfer station to achieve hydraulic capture of injected amendments and potential remediation byproducts (e.g. hexavalent chromium).

The GWE wells will be designed and installed to:

1. Provide hydraulic containment of dissolved-phase COCs in groundwater in the downgradient direction from the two former UST areas. The GWE wells, after reaching hydraulic equilibrium, would quickly prevent the lateral and/or vertical expansion of COC impacts in groundwater by extracting COC-impacted groundwater as it flows toward the downgradient property boundary.
2. Extract groundwater with dissolved phase VOC impacts within the hydraulic capture radius of each GWE well.
3. Induce an upward or, at a minimum, neutral vertical groundwater gradient to prevent impacts to the underlying Gage aquifer.
4. Increase the dissolution rate of soil sorbed mass in the saturated zone by inducing quicker groundwater flow through impacted saturated soils when compared to natural groundwater flow conditions.
5. Increase the dissolution rate of soil sorbed mass in the saturated zone by enhancing the ability of the aquifer system to accept injected, amended groundwater.

Extracted groundwater would be pumped to an aboveground treatment system which utilizes bag and/or cartridge filters for particulate filtration followed by AGAC for VOC abatement. Treated groundwater would be discharged either to a POTW sewer or re-injected under a WDR permit program. Groundwater reinjection may also be used as an

enhancement to this technology to assist in controlling groundwater gradients and/or to create a groundwater recirculation system.

Under the selected CM alternative, GWE/injection would initially occur for a period of time until it is confirmed that hydraulic control has been achieved around the periphery of the recirculation cell (injection/extraction wells), injected groundwater is moving away from the injection wells and towards the extraction wells located on the western portion of the transfer station and eastern side of the site, and an upward/neutral vertical groundwater gradient had been achieved to prevent impacts to the underlying Gage aquifer. The groundwater will then be amended with persulfate or an appropriate bio-amendment until it is concluded that soil sorbed mass in the saturated zone has been reduced appreciably such that GWE/reinjection without amendment is appropriate. The recirculation cell will continue to operate until concentrations of COCs in groundwater are reduced so that, in the absence of GWE, MNA is demonstrated to be appropriate.

#### Off-Site Groundwater Extraction

As a component of the selected CM alternative, GWE wells would be installed northeast of the site in the downgradient direction. These GWE wells will be designed and installed to:

- Prevent migration of groundwater impacted by historical site activities beyond Hindry and Manchester Avenues.
- Provide capture of impacted groundwater without hydraulically influencing groundwater beneath downgradient properties with known soil and groundwater impacts.
- Extract and treat groundwater impacted by historical site activities present between these GWE wells and the property boundary containment wells.

Extracted groundwater would be pumped to the on-site aboveground treatment system described previously.

Under the selected CM alternative, GWE will continue to operate until concentrations of COCs in groundwater between these GWE wells and the property boundary containment wells are reduced so that, in the absence of GWE, MNA is demonstrated to be appropriate.

#### Monitored Natural Attenuation

Once relevant CAOs/CASs are achieved, the remedy will switch to a MNA strategy. The MNA phase of the alternative consists of continue quarterly groundwater monitoring (post-remedy), for two years to establish appropriate lines of evidence in accordance with EPA guidance (EPA, 1999) that MNA is appropriate. After two years of quarterly monitoring and reporting has been completed and it has been demonstrated that MNA is appropriate, the remedy would switch to semi-annual groundwater monitoring. Should MNA not appear to be appropriate in portions of the groundwater plume targeted by GWE, GWE will be partially reinitiated to address these areas.

#### **References Used**

AMEC Geomatrix, 2010a. Phase IV RFI Addendum Report, Rho-Chem Facility, Inglewood, California. December 8.

AMEC Geomatrix, 2010b. Phase IV RFI Addendum Report, Rho-Chem Facility, Inglewood, California. December 8.

AMEC Environment & Infrastructure, Inc., 2014, Implementation Report, Rho-Chem Facility, 425 Isis Avenue, Inglewood, California, May 13.

Amec Foster Wheeler, 2015. Human Health Risk Assessment Work Plan, Rho-Chem Facility, 425 Isis Avenue, Inglewood, California. October 23.

Amec Foster Wheeler, 2016a, Enhanced In Situ Bioremediation of Volatile Organic Compounds in Groundwater, Final Interim Report, Rho-Chem Facility, 425 Isis Avenue, Inglewood, California, May 17

Amec Foster Wheeler, 2016b, Human Health Risk Assessment, Rho-Chem Facility, 425 Isis Avenue, Inglewood,

California, November 30.

Amec Foster Wheeler, 2018, Corrective Measures Study Report, Rho-Chem Facility, 425 Isis Avenue, Inglewood, California.

Brown and Caldwell, 1989, Corrective Action Program, Rho-Chem Facility, Inglewood, California, prepared for Rho-Chem Corporation. June.

DTSC, 2002, HWCA P3-01/02-005, Corrective Action Consent Agreement, Rho-Chem Corporation, 425 Isis Avenue, Inglewood, California, EPA ID No. CAD008354432, issued to Rho-Chem Corporation (A Subsidiary of Philip Services Corporation) and Southdown (respondents), executed November 25, 2002.

DTSC, 2008, Hazardous Waste Facility Permit, Rho-Chem, LLC, 425 Isis Avenue, Inglewood, California 90301, Facility EPA ID Number CAD008364432; Effective Date August 28, 2008.

Ecology and Environment, Inc., 1988, RCRA Facility Assessment. September 6.

EPA, 1999, Use of Monitored Natural Attenuation at Superfund, RCRA Corrective Action, and Underground Storage Tank Sites, April 21.

Geomatrix, 2008, Site Soil Vapor Investigation Report, Rho-Chem Facility, 425 Isis Avenue, Inglewood, California, HWCA: P3-01/02-005, January 21.

Geomatrix, 2009. Current Conditions Report, Rho-Chem Facility, 425 Isis Avenue, Inglewood, California, February 7, 2003 (revised February 28, 2006 and November 2009).

## ENVIRONMENTAL IMPACT ANALYSIS:

### 1. Aesthetics

Project Activities Likely to Create an Impact: None

Description of Baseline Environmental Conditions: The facility is located in a predominantly industrial area that is characterized by large buildings, asphalt or concrete paved parking lots and driveways. The facility and others in the immediate vicinity have external machinery on various portions of their sites. At the Rho-Chem facility, these consist of tanks, piping, pumps, stills, drums, etc.

Most of the selected CM alternative will be below ground. The SVE system was installed at the site in 2011, and the groundwater extraction and treatment system (GWETS) is relatively small, having a footprint of approximately 625 square feet. Both the SVE system and GWETS compounds look similar to the other site industrial features on this and surrounding sites, such as tanks, stills, etc. In fact, the aboveground system components are smaller in size than most of the existing tanks, etc. The project will not add new light or glare, block views, obstruct scenic vistas, damage scenic resources, or result in an aesthetically unpleasant site. The current configuration of the facility will not be significantly altered.

Analysis as to whether or not project activities would:

- a. Have a substantial adverse effect on a scenic vista?

Impact Analysis: No, the site will not have a substantial adverse effect on any scenic vista. There is no scenic vista associated with the area which is designated as a light industrial area or M-1 pursuant to the City of Inglewood Land Use Planning Map.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Impact Analysis: No, the proposed project requires aboveground installation of only the GWETS. Associated underground piping trenches, and injection and extraction wells will be installed subgrade. These will not be located in an area that could affect any scenic building or highway pursuant to the references at the end of this section. The installation of the aboveground components of the GWETS will be on existing paving and therefore the project will not damage any scenic resources, including trees, rock outcropping and historic buildings within a state scenic highway.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- c. Substantially degrade the existing visual character or quality of the site and its surroundings?

Impact Analysis: No, the project will not degrade the existing visual character or quality of the site or its surroundings pursuant to the references at the end of this section.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- d. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?

Impact Analysis: No, the project will not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. No new lighting will be required as part of the GWETS installation or operation.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

*References Used:*

1. Current Condition Report, Rho-Chem Facility, Geomatrix Consultants, Inc., (GMX) February 7, 2003 (Page 27-29)

2. Corrective Measures Study Report, Rho-Chem Facility, 425 Isis Avenue, Inglewood, California, Amec Foster Wheeler Environment & Infrastructure, Inc., 2018

## 2. Agricultural Resources

Project Activities Likely to Create an Impact: No, the proposed project for implementing the selected CM alternative will not create an impact on the agricultural resources of the site.

Description of Baseline Environmental Conditions: The facility is located in a predominantly industrial area which is characterized by concrete tilt-up buildings and asphalt- or concrete-paved parking lots and roads. The site is not located at or even near any prime, unique, or statewide importance farmland (Farmland) pursuant to Farmland Mapping and Monitoring Program of the California Resources Agency.

The site is designated as a light industrial area as M-1 pursuant to the City of Inglewood Land Use Planning Map and there will be no conversion of usage associated with the proposed project. The selected CM alternative will be on-site and will occupy only approximately 1,000 square feet. There is no local agriculture at all. Therefore, the proposed project will not conflict with existing zoning or agriculture use, or Williamson Act contract, or involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland, to non-agricultural uses.

Analysis as to whether or not project activities would:

- a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on [the maps prepared pursuant to the Farmland Mapping and Monitoring Program](#) of the California Resources Agency, to non-agricultural use?

Impact Analysis: This proposed project will not involve in the conversion of any Farmland into non-agriculture use. The site is fully paved and is designated as a light industrial area or M-1 pursuant to the City of Inglewood Land Use Planning Map. There is no agricultural use anywhere in the area.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- b. Conflict with existing zoning for agricultural use, or a [Williamson Act](#) contract?

Impact Analysis: The site is fully paved and is designated as a light industrial area or M-1 pursuant to the City of Inglewood Land Use Planning Map. This project will not involve in the conversion of the Farmland into non-agriculture use, therefore, will not conflict with existing zoning or agriculture use, or William Act contract. There is no agricultural use anywhere in the area.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in [Public Resources Code section 12220\(g\)](#)), timberland (as defined by [Public Resources Code section 4526](#)), or timberland zoned Timberland Production (as defined by [Government Code section 51104\(g\)](#))?

Impact Analysis: The proposed project will not conflict with existing zoning for, or cause rezoning of forest land, timberland, or timberland zoned Timberland Production. Relatively small pieces of industrial equipment for the GWETS will be added to the site, which is already occupied with a large amount of relatively large equipment.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- d. Result in the loss of forest land or conversion of forest land to non-forest use?

Impact Analysis: The site is fully paved and is designated as a light industrial area or M-1 pursuant to the City of Inglewood Land Use Planning Map. This project will not involve in the conversion of forest land into non-forest use. There is no forest land anywhere in the area.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural uses?

Impact Analysis: The proposed project will not involve any changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agriculture uses. Relatively small pieces of industrial equipment for the GWETS will be added to the site, which is already occupied with a large amount of relatively large equipment.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

*References Used:*

1. Current Condition Report, Rho-Chem Facility, Geomatrix Consultants, Inc., (GMX) February 7, 2003 (Page 27-29)
2. Corrective Measures Study Report, Rho-Chem Facility, 425 Isis Avenue, Inglewood, California, Amec Foster Wheeler Environment & Infrastructure, Inc., 2018

### 3. Air Quality

Project Activities Likely to Create an Impact: Installation of a GWETS that would involve heavy equipment (drill rigs, backhoes, forklift, dump trucks), operation of the SVE system and GWETS, and worker commute in trucks and/or passenger vehicles for routine groundwater sampling and maintenance of the SVE system and GWETS.

Description of Baseline Environmental Conditions: The proposed project is located in the South Coast Air Basin (SCAB), a 6,600 square mile area. The basin is an area of high air pollution potential and is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). SCAB is designated a non-attainment area for federal and state standards for ozone, fine particulate matter (PM<sub>10</sub>), carbon monoxide (CO), and nitrogen dioxides (NO<sub>2</sub>). The facility performs its normal operations under a SCAQMD permit. In addition, another SCAQMD permit has been obtained for operation of the SVE system since 2011.

The air quality impacts are determined according to the criteria set on the federal, state and local pollution standards/regulations. A summary of federal and state air quality standards is provided in Table 1 and potential health effects are shown in Table 2. The EPA established national ambient air quality standards pursuant to adoption of federal Clean Air Act. The California Air Resources Board (CARB) establishes state air quality standards under the mandate of the Mulford-Carrell Act. Currently, federal and state standards for ozone, carbon monoxide, nitrogen dioxide, and suspended particulates are often exceeded in the Basin. The SCAQMD monitors criteria pollutant levels at various stations within the Basin. As shown in Table 3, criteria pollutant levels near the project site are based on data from the Southwestern Los Angeles County monitoring station (located approximately 10 miles from site). Impacts would be considered significant if the proposed project emissions met the following criteria:

SCAQMD suggested threshold criteria (SCAQMD CEQA Handbook, 1993):

Pollutant	Threshold criteria (lbs/day)	Operation (lbs/day)
ROG	55	55
CO	550	550
NO <sub>x</sub>	55	55
SO <sub>x</sub>	150	150
PM <sub>10</sub>	150	150
PM <sub>2.5</sub>	55	55

**Table 1. Federal and State Ambient Air Standards**

Pollutant	Averaging Time	Federal Standard	California Standard
Ozone	1 Hour	---	0.09 ppm
	8 Hour	0.070 ppm	0.070 ppm
Carbon Monoxide	1 Hour	35.0 ppm	20.0 ppm
	8 Hours	9.0 ppm	9.0 ppm
Nitrogen Dioxide	1 Hour	---	0.25 ppm
	Annual	0.05 ppm	---
Sulfur Dioxide	1 Hour	75 ppb	0.25 ppm
	24 Hours	0.14 ppm	0.04 ppm
	Annual	0.03 ppm	---
PM <sub>10</sub>	24 Hours	150 µg/m <sup>3</sup>	50 µg/m <sup>3</sup>
	Annual	---	20 µg/m <sup>3</sup>

ppm: Parts per million; ppb: Part per billion; µg/m<sup>3</sup>: Micrograms per cubic meter

Source: California Air Resources Board (May 4, /2016)

**Table 2. Air Pollutants Summary:**

Air Pollutant	Source	Health Effects
Ozone	Photochemical reaction between other pollutants	General respiratory irritation and Discomfort
Carbon Monoxide	Incomplete fuel combustion	Interference with normal oxygen transfer

		to the blood; oxygen deprivation
Nitrogen Oxides	Combustion	Respiratory irritation
Sulfur Dioxide	Combustion of fuels containing industrial, transportation, agriculture, construction activities	Upper respiratory irritation; lung tissue injury; adverse effects on respiratory system
Particulates		

Source: Bay Area Air Quality Management District (November 1985)

**Table 3. Summary Air Pollutant Data from Southwest Coastal LA County Monitoring Station (2014-2016)**

Pollutant	SCAQMD Station Data		
	2014	2015	2016
CO:			
Max. Conc.(ppm) 1 hour	3	1.7	1.6
Max. Conc.(ppm) 8 hours	1.9	1.4	1.3
Ozone:			
Max. Conc.(ppm) 1-hour	0.114	0.098	0.087
Max. Conc.(ppm) 8-hour	0.080	0.077	0.080
1-hours > 0.124 ppm (F)	0	0	0
8-hours > 0.070 ppm (F)	6	1	0
1-hours > 0.09 ppm (S)	1	1	2
8-hours > 0.070 ppm (S)	6	3	3
NOx			
Max. Conc.(ppb) 1-hour	87.3	87.0	81.8
98 <sup>th</sup> Percentile Conc. (ppb)	66.4	0.08	54.7
Annual Average (ppb)	11.9	10.9	10.1
SOx			
Max. Conc.(ppm) 1-hour	15.3	14.9	9.7
99 <sup>th</sup> Percentile Conc. ppm 1-hour	9.1	6.8	5.7
PM10			
Max. Conc.(µg/m <sup>3</sup> ) 24 hrs	46	42	43
Annual Average	22.0	21.2	21.6
Days > 150 µg/m <sup>3</sup> (F) 24 hrs	0	0	0
Days > 50 µg/m <sup>3</sup> (S) 24 hrs	0	0	0

NM: Not measured; µg/m<sup>3</sup>: Micrograms per cubic meter; ppb: Part per billion; ppm: Parts per million; F: Federal Standards; S: State Standards.

(Source: SCAQMD Air Quality Data Tables, 2014-2016, Southwest Coastal LA County Station No. 820)

The short-term impacts on the air pollutants (i.e., ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, and PM10) from the fugitive dust and construction equipment due to construction of the SVE system was analyzed in the previous CEQA study. The unmitigated construction emissions were estimated to be lower than the suggested SCAQMD criteria. A permit has been obtained from SCAQMD for the control of emissions from the SVE system. Field personnel are currently and will continue to supervise the operation of the SVE system and perform periodic field screening to assure that SCAQMD emission requirements are met. The SVE system exhaust has emission controls meeting best available control technology (BACT) requirements (specified in the SCAQMD permit).

Activities that could potentially generate air pollutant emissions over the course of this project includes construction of the GWETS, long-term operation of the SVE system and GWETS and routine groundwater sampling. Construction of the GWETS will consist of drilling and installing of 23 wells, 8,640 square feet of trenching for underground piping and construction of 625 square feet of secondary containment pad for the GWETS. The construction activities above are

expected to be short-term (up to three months) and dust suppression measures will be implemented during construction as mitigation measures. Air emission impacts might temporarily result from the well installation and trenching activities. Specifically, particulates and air pollutants would be emitted by the engines of various drilling and construction equipment, and dust would be generated from soil excavation and back-filling. Use of water or other soil stabilizers which would be used to control fugitive dust, as required by SCAQMD Rule 403, can reduce emissions by a minimum of 50 percent. Based on the CMS (Amec Foster Wheeler, 2018), a total of 9 extraction wells, 14 injection wells, 8,640 square feet of trench opening and 625 square feet GWETS compound would be constructed after the Corrective Measures Implementation Plan (CMIP) is approved by the DTSC.

Operation of the SVE system and GWETS will consist of continuous operation of the two systems. Weekly site visit by a technician for maintenance and monitoring. Vapor and groundwater sampling will be conducted in accordance with the permits.

Air pollutant emissions and/or ambient concentration increments from existing, project related and cumulative sources that could potentially impact sensitive receptors within the project area or its vicinity have been estimated using the California Emissions Estimator Model 2016.3.2 (CalEEMod 2016.3.2). The air quality impact was evaluated on the short-term impacts due to construction activity, long term impacts due to project operation, and conformity with the AMP. SCAQMD emission factors were utilized by the CalEEMod to estimate emissions of air pollutants such as reactive organic gas (ROG) which is considered ozone precursors, carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>), and particle matters with aerodynamic radius less than 10 microns (PM<sub>10</sub>), during these construction activities. The estimated daily peak emissions for construction phase and operational phase are provided in the following table. The CalEEMod data input, assumptions and output are provided in Attachment A.

#### **Unmitigated Daily Peak Emission Estimates (pounds/day)**

Activities	ROG	CO	NO <sub>x</sub>	SO <sub>2</sub>	PM <sub>10</sub>
Construction of the GWETS	2.50	23.37	22.70	0.044	2.12
Operation of the SVE system and GWETS	2.85	18.60	19.68	0.037	0.96
Suggested SCAQMD Criteria - Construction	75	550	100	150	150
- Operation	55	550	55	150	150
Exceed Threshold Criteria	No	No	No	No	No

Source: SCAQMD Air Quality Significance Thresholds, Revision March 2015

These calculated data do not exceed the suggested SCAQMD criteria. Therefore, emissions that would be generated from implementation of the proposed project would not result in significant impact on air quality. Based on the information provided by the facility and the air quality analysis, the remedy selected activities will not significantly affect the air quality of the area. This project will not conflict with or obstruct implementation of the applicable air quality plan or violate any air quality standard or contribute substantially to an existing or projected air quality violation. This project will not result in cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors). This project will not expose sensitive receptors to substantial pollutant concentrations. This project will not create objectionable odors affecting a substantial number of people. This project did not involve in the removal of old building constructed before 1950 and the site is not located at any asbestos mine site lists, therefore, this project will not result in human exposure to Naturally Occurring Asbestos (see also Geology and Soils, item f.).

Analysis as to whether or not project activities would:

- a. Conflict with or obstruct implementation of the applicable air quality plan?

Impact Analysis: The project will not conflict or obstruct implementation of the applicable air quality plan. The reasons are provided in the foregoing description.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Impact Analysis: No, the reasons are provided in the foregoing description.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- c. Result in cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Impact Analysis: The proposed project will not result in cumulatively net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. The reasons are provided in the foregoing description.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- d. Expose sensitive receptors to substantial pollutant concentrations?

Impact Analysis: No, the project will not expose sensitive receptors to substantial pollutant concentrations. The reasons are provided in the foregoing description.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- e. Create objectionable odors affecting a substantial number of people?

Impact Analysis: This proposed project will not significant create objectionable odors affecting anyone much less a substantial number of people. SVE is specifically designed to capture vapors removed from the subsurface. The facility is located in a light industrial zone area. The closest residences, at most three, are at Hillcrest Street, about 1/4 miles south of the facility. Quarterly or annually monitoring activities and operation of the SVE system may allow exceeding small amounts, on the order of parts per billion by volume (ppbv), of VOCs to escape but are not expected to cause any objectionable odor --- even adjacent to the operating equipment.

## Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

**References Used**

1. Current Condition Report, Rho-Chem Facility, Geomatrix Consultants, Inc., (GMX) February 7, 2003 (Page 27-29)
2. Remediation Status Report, Second Semi-Annual 2016, Rho-Chem Facility, Amec Foster Wheeler, August 16, 2017.
3. Interim Measures Work Plan, Rho-Chem Facility, Geomatrix Consultants, Inc. (GMX), January 31, 2000.
4. Corrective Measures Study Report, Rho-Chem Facility, 425 Isis Avenue, Inglewood, California, Amec Foster Wheeler Environment & Infrastructure, Inc., 2018.
5. California Emissions Estimator Model User's Guide, Version 2016.3.2, 2016.
6. CEQA Initial Study Workbook, DTSC, April 2004.
7. CEQA Air Quality Handbook, SCAQMD, April 1993

**4. Biological Resources**

Project Activities Likely to Create an Impact: No, the proposed project will not create an impact on any biological resources at the site.

Description of Baseline Environmental Conditions: The site is located in a predominantly industrial area of the City of Inglewood, in Los Angeles County, and is characterized by large stucco/steel building and surrounding areas of asphalt-or concrete-paved parking and access roads. There is a very low potential for the site to support sensitive biological resources because of site improvements, including pavement and buildings and its general location in an industrialized area. The CCR of the Rho-Chem facility indicates that the search of the National Environmental Policy Act (NEPA) database reveals that there are no designated wilderness areas, wildlife preserves, wetlands, or 100-year floodplains located within 1 mile radius of the site. Review of available information in the California Biodiversity Database revealed two plants, the coastal dunes milk-vetch and the southern tar plant, as endangered species in the general vicinity. However, based on the information provided, the habitat for both plants is the coast dune and wetlands in southern California. This facility, however, is fully paved and is not suitable a habitat for these plants. The last observed occurrences of these plants were in the early 1900s.

No impacts to biological resources are expected as a result of the implementation of the project because the surrounding area is fully developed. Moreover, the proposed project will affect only a few hundred square feet of the facility which is itself fully paved. Therefore, the project will not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species, on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game, or U.S. Fish and Wildlife Service. The project will not have any impact on plant life in general, or rare and unique plant life or those ecological communities dependent on such plant life. There will not be any adverse effect on listed, threatened, and endangered plants, on species of plants listed as protected or identified for special management in the Fish and Game Code, the Public Resources Code, the Water Code, or regulations adopted there under, nor on marine and terrestrial plant species subject to the jurisdiction of the Department of Fish and Game or the ecological communities in which they reside. The project will not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. The project will not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. The project will not conflict with local policies or ordinances protecting biological resources,

such as a tree preservation policy or ordinance. The project will not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Analysis as to whether or not project activities would:

- a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the [California Department of Fish and Game](#) or [U.S. Fish and Wildlife Service](#)?

Impact Analysis: No impacts to biological resources are expected as a result of the implementation of the project because the facility is fully paved and surrounding region is thoroughly developed. Information gathered from the U.S. Fish and Wildlife Service indicated that 4 types of endangered or threatened birds and one type of insect can potentially be present on or near the project location. However, due to very limited vegetation and busy activity and traffic at or near the site, it's unlikely that there is wildlife habitat for these species. Also, the construction duration of the GWETS is expected to be only 2-3 months. Therefore, the project will not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species, on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game, or U.S. Fish and Wildlife Service.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the [California Department of Fish and Game](#) or [U.S. Fish and Wildlife Service](#)?

Impact Analysis: The proposed project will not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game, or U.S. Fish and Wildlife Service. The facility is fully paved and surrounding region is thoroughly developed. No run-off is expected to result from the proposed project.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- c. Have a substantial adverse effect on federally protected wetlands as defined by [Section 404 of the Clean Water Act](#) (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Impact Analysis: No, the project will not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. The facility is fully paved and surrounding region is thoroughly developed. No run-off is expected to result from the proposed project.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Impact Analysis: No, the project will not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. The facility is fully paved and surrounding region is thoroughly developed.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- e. Conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Impact Analysis: No impacts to biological resources are expected as a result of the implementation of the project because both the facility and surrounding region are developed thoroughly. The proposed project will not conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. There are no trees at the facility.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- f. Conflict with the provisions of an adopted [Habitat Conservation Plan](#), [Natural Community Conservation Plan](#), or other approved local, regional, or state habitat conservation plan?

Impact Analysis: No impacts to biological resources are expected as a result of the implementation of the project because both the site and surrounding region are developed thoroughly. The project will not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

*References Used:*

1. Current Condition Report, Rho-Chem Facility, Geomatrix Consultants, Inc., (GMX) February 7, 2003 (Page 27-29)

2. Corrective Measures Study Report, Rho-Chem Facility, 425 Isis Avenue, Inglewood, California, Amec Foster Wheeler Environment & Infrastructure, Inc., 2018

## 5. Cultural Resources

Project Activities Likely to Create an Impact: Drilling of wells and trenching for the installation of underground piping of approximately 2,880 lineal footage (approximately 8,640 square feet).

Description of Baseline Environmental Conditions: The facility has been previously graded and covered in asphalt and concrete. No additional grading is necessary for this project. The proposed project will affect approximately 10,000 square feet of the facility and off-site near the facility, which is already covered by concrete and asphalt. It is located in a primarily industrial area. No known unique ethnic cultural values or cultural resources have been observed by the DTSC project manager or have otherwise been reported at the facility. There are no bedrock exposures on-site or in the vicinity of the site and the fluvial nature of the underlying geological materials obviate the likelihood of any paleontological resources.

There are no reported unique ethnic cultural values, archeological resources or cultural/paleontological resources at the facility. The site is not on the historical properties/ buildings list pursuant to Office of Historic Preservation. The site is designated and zoned for light industrial use as M-1. The footprint of the SVE system and GWETS are less than 1,000 square feet. The GWETS will be installed on an existing concrete slab so that no excavation will be required. The trenching areas are estimated to be approximately 8,640 square feet and are located in area already covered by concrete and asphalt. All trenching area will be restored to the original condition after the conveyance piping has been installed. Small diameter boreholes, each with less than 12 square inches in area, scattered across the facility and off-site near the facility would represent a minimum invasion of the subsurface, even if the existing concrete concealed cultural or archeological resources. Logs from previous exploratory borings have not revealed any evidence of cultural or archeological resources. Operation of the SVE system and GWETS with soil vapor and groundwater monitoring activities removes vapor and groundwater from the subsurface, respectively, and cannot have any significant adverse impact on historical resources or archeological resources in any event. This proposed project will not cause an adverse change on a significance of a historical resources or archeological resource as defined in 15064.5.

Analysis as to whether or not project activities would:

- a. Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Impact Analysis: No building or other structure of the facility is on the historical properties/ buildings list pursuant to Office of Historic Preservation. The CM is primarily the continued operation of the SVE treatment system with soil vapor monitoring activities, and the installation and operation of a GWETS with groundwater monitoring activities which will not have any significant adverse impact on historical resources at the site as defined in 15064.5.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Impact Analysis: The site is not on the archeological resources list pursuant to electronic information provided through the California Native American Heritage Commission<sup>2</sup> and Office of Historic Preservation<sup>6</sup>. The site lies within the ancestral lands of the Gabrielino/Tongva which stretch from Topanga Canyon in Los Angeles County through Aliso Creek in Orange County<sup>2, 5</sup>. The facility does not lie on or near any reported sites of sacred importance to the Gabrielinos<sup>5</sup>. Importantly, the location has extensive previous disturbance due to some 30 or more USTs being removed<sup>4</sup>. Ground disturbance during construction of the GWETS will involve trenching for the

installation of underground piping and drilling of wells, which is expected to have little potential for inadvertent discovery since borings and trenching area would be made through the existing concrete cover. If an inadvertent discovery of archaeological resources is unearthed, all project activities shall cease and a qualified professional archaeologist shall be retained to assess the discovery and make recommendations to the appropriate persons and property owner as to the significance of the find.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Impact Analysis: This project will not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

d. Disturb any human remains, including those interred outside of dedicated cemeteries?

Impact Analysis: No known unique ethnic cultural values or cultural/paleontological resources at the facility have been observed during site-visits by the project manager and other DTSC inspectors. No cemeteries were found during the extensive excavations done as a part closure of a number of USTs at the facility.

It is not anticipated that this project will disturb any human remains, including those interred outside of formal cemeteries. If, however, in the unlikely event of an inadvertent discovery of human remains, the project will cease activities in the immediate area and the county coroner contacted to assess the discovery. The appropriate authorities shall be contacted and the proper procedures followed pursuant to Public Resources Code 5097.9. The coroner will determine disposition within 48 hours. If the remains are Native American, the coroner will be responsible for contacting the NAHC within 24 hours. The NAHC will identify and notify the person(s) who might be the most likely descendent (MLD) who will make recommendations for the appropriate and dignified treatment of the remains (Public Resources Code, section 5097.98). The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the Site (CEQA Guidelines, CCR section 15064.5(e); HSC section 7050.5).

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

*References Used:*

1. Health and Safety Code 7050.5:

[http://leginfo.legislature.ca.gov/faces/codes\\_displaySection.xhtml?lawCode=HSC&sectionNum=7050.5](http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=HSC&sectionNum=7050.5).

2. California Native American Heritage Commission: <http://www.ca.gov/Agencies/Native-American-Heritage-Commission>

3. Current Condition Report, Rho-Chem Facility, Geomatrix Consultants, Inc., February 7, 2003, (Page 27-29)
4. Underground Storage Tank Removal Report, Rho-Chem Facility, GMX, February 13, 2003,
5. Interim Measures Work Plan, GMX, January 31, 2000
6. Gabrielino/Tongva sacred sites <http://www.gabrielinotribe.org/historical-sites-1/>
7. Office of Historic Preservation <http://ohp.parks.ca.gov>.
8. Corrective Measures Study Report, Rho-Chem Facility, 425 Isis Avenue, Inglewood, California, Amec Foster Wheeler Environment & Infrastructure, Inc., 2018

## 6. Energy

Project Activities Likely to Create an Impact: Installation of a GWETS that would involve heavy equipment (drill rigs, backhoes, forklift, dump trucks), operation of the SVE system and GWETS, and worker commute in trucks and/or passenger vehicles for routine groundwater sampling and maintenance of the SVE system and GWETS.

### Description of Baseline Environmental Conditions:

Originally developed in 2003 and updated in 2005 and 2008, the California Energy Action Plan identifies specific action areas to ensure that California's energy resources are adequate, affordable, technologically advanced, and environmentally sound. The plan's first-priority actions to address California's increasing energy demands are energy efficiency and demand response (i.e., reduction of customer energy usage during peak periods to address system reliability and support the best use of energy infrastructure). Additional priorities include the use of renewable sources of power and distributed generation.

The City of Inglewood has developed draft policies, objectives, strategies, and programs to address GHG emissions and climate change. These draft policies include improving energy efficiency, increasing renewable energy, reducing transportation emissions through vehicle and fuel strategies, reducing vehicle miles traveled through land use strategies, reducing vehicle miles traveled through public transit, transportation demand management, and active transportation strategies, reducing solid waste sent to landfill, and water conservation.

### Analysis as to whether or not project activities would:

- a. Result in potentially significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Activities that could potentially generate air pollutant emissions over the course of this project includes construction of the GWETS, long-term operation of the SVE system and GWETS and routine groundwater sampling. Construction of the GWETS will consist of drilling and installing of 23 wells, 8,640 square feet of trenching for underground piping and construction of 625 square feet of secondary containment pad for the GWETS. The construction activities above are expected to be short-term (up to three months) and dust suppression measures will be implemented during construction as mitigation measures.

The Proposed activities would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Construction of the project will require consumption of fuel to run construction vehicles and equipment. However, the work will be short-term and temporary. Implementation of best management practices, which minimize unnecessary construction vehicle idling time, will further reduce energy consumption. Therefore, impacts will be less than significant.

### Impact Analysis:

There will be no conflict or obstruction to state or local energy plans for renewable energy or energy efficiency from the Proposed Project activities.

### Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Impact Analysis:

There will be no conflict or obstruction to state or local energy plans for renewable energy or energy efficiency from the Proposed Project activities.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

References Used:

1. *California Energy Action Plan*. Accessed on April 19, 2019. Retrieved from: <https://www.energy.ca.gov/2008publications/CEC-100-2008-001/CEC-100-2008-001.PDF>
2. *City of Inglewood Energy Efficiency Climate Action Plan, December 2015*. Retrieved from: [http://www.southbaycities.org/sites/default/files/EECAP\\_Inglewood\\_Final\\_20151218.pdf](http://www.southbaycities.org/sites/default/files/EECAP_Inglewood_Final_20151218.pdf)
3. *City of Inglewood Supplemental Energy Climate Action Plan, January 2018*. Retrieved from: <http://southbaycities.org/sites/default/files/Inglewood%20CAP.pdf>
4. *U.S. Department of Energy 2019. 2009 American Recovery and Reinvestment Act Overview*. Accessed on April 19, 2019. Retrieved from: <https://www.energy.gov/oe/information-center/recovery-act>

## 7. Geology and Soils

Project Activities Likely to Create an Impact: No, the proposed project for installing, operating, and/or monitoring of the SVE system and GWETS will not create a significant impact on the geology and soils of the facility. The SVE system was installed in July 2011 and continues to operate.

Description of Baseline Environmental Conditions: The Rho-Chem facility is located in Section 32, Township 2 South, Range 14 West, San Bernardino Base and Meridian within the City of Inglewood, County of Los Angeles, California. Topographic map coverage of the site vicinity is provided by the U.S. Geological Survey, Inglewood and Venice, California Quadrangle 7.5 minute series (1954, 1964, and photo-revised in 1981). A copy of the modified Inglewood and Venice topographic quadrangle portraying the site location is provided in Figure 1.

The elevation of the site is approximately 100 feet above mean sea level (amsl) with a local topographic gradient of flat and slopes gently to the southeast. The site does not lie within 100-year flood plain. In addition, there are no waterways or wetlands within 1-mile radius of the facility.

The site is located in the Coastal Plain of the Los Angeles basin, within the northern portion of the West Coast subbasin, referred to as the West Coast Basin. Two other subbasins surround the West Coast Basin: the Santa Monica Basin to the north, and the Central Basin to the east (U.S. Geological Survey, 2003). The West Coast Basin boundaries are defined by the Newport-Inglewood Fault Zone (also referred to as the Newport-Inglewood Uplift) to the east, the Ballona Gap to the north (an abandoned erosional channel from the Los Angeles River), and the Pacific Ocean and Palos Verdes Hills to the west and south (California Department of Water Resources [DWR], 2004). Major geologic features in the area include the Charnock Fault, the Gardena Syncline, and the Newport-Inglewood Fault Zones. These features

trend from northwest to southeast in the basin. The Charnock Fault is located approximately ½ mile to the west of the site. The Gardena Syncline, a basin-wide structure, underlies the site, and Newport-Inglewood Fault is located approximately 2 miles east of the site. The geologic formation materials in this portion of the West Basin consist of approximately 200 feet of alluvial deposits of the upper Pleistocene-aged Lakewood Formation, underlain by approximately 400 feet of undifferentiated sediments of the lower Pleistocene-aged San Pedro Formation, which contain the primary drinking water aquifers (DWR, 1961). The depths and thickness of these aquifers vary across the basin. The major aquifers of concern from the oldest to the youngest (deep to shallow) are: Silverado, Lynwood, and Gage Aquifers. Most of these aquifers are separated by regionally extensive aquitards or low permeability units. However, areas within 2 miles radius of the Rho-Chem site where all of these aquifers merge are hydraulically connected.

Deposits at the site to approximately 150 feet bgs consist of the Lakewood Formation and can be categorized into the following six zones:

- Zones 1 and 2: clay with intervals of silt, to approximately 70 feet bgs (or 30 feet amsl);
- Zone 3: sandy soil with some silty sand to approximately 120 feet bgs (or -20 feet amsl);
- Zone 4: predominately fine-grained materials ranging from less than 10 feet to approximately 25 feet thick;
- Zone 5: sandy to silty sand with occasional gravel that makes up the Gage aquifer;
- Zone 6: Silts, clays, and silty sands.

Surficial deposits consist of a thick sequence of clay with intervals of silt, to approximately 70 feet bgs (or 30 feet amsl), designated as Zones 1 and 2. These surficial deposits are underlain by an interval of sandy soil with some silty sand to approximately 120 feet bgs (or -20 feet amsl), designated as Zone 3. It is within Zone 3 that the first groundwater zone is encountered and occurs under unconfined conditions.

Predominately fine-grained materials, making up Zone 4, underlay the Zone 3 sandy unit, and range in thickness from less than 10 feet to approximately 25 feet. At the GCW borings located in the southeast corner of the site, the fine-grained materials of Zone 4 are absent at two borings, GCW-3 and GCW-4. It is likely this fine-grained unit is of varying thickness across the general area of the site, and may be absent in other locations.

Underlying Zone 4 is a sandy to silty sand unit with occasional gravel intervals, which makes up the Gage aquifer, designated as Zone 5. Beneath the site, the Gage aquifer is approximately 70 to 80 feet thick and is encountered at approximately 130 to 150 feet bgs (or -20 to -50 feet amsl). Although the composition of the Gage aquifer varies across the Los Angeles Basin, the logs of borings installed at the site are consistent with descriptions of the Gage aquifer for the West Coast Basin, which is described as typically a fine to medium-grained sand with minor amounts of gravel, sandy silt, and clay. Materials below the Gage aquifer in the vicinity of the site consist of silts, clays, and silty sands, designated as Zone 6.

The proposed project will not result in unstable earth conditions or any changes to the underlying geological materials, topography, or ground surface. Extensive excavation has previously occurred across portions of the facility; however, no further excavation is anticipated except for trenching of the underground piping for the GWETS which will be located outside and away from the building in areas that are currently concrete or asphalt paved. The width of the trenches are no more than 3 feet and the depth of the trenches will be no more than 4 feet below the ground surface. The GWETS compound will be constructed on existing concrete-paved surface located outside and away from the building.

Therefore, no significant impacts are expected to the building foundations or the underlying soil structure from project activities. The facility is paved, there will be no exposure of surface soil and neither wind or water erosion of soil, can result, on-site or off-site. The facility is approximately 5 miles west of the Pacific Ocean and this proposed project will not affect deposition or erosion of beach sands. Because there will be no exposure of soils, neither siltation, deposition, or erosion will occur which may cause modification of a channel of a river or stream or the bed of the ocean or any bay, inlet or lake. In addition, it should be noted that the nearest surface drainage is Ballona Creek, a concrete-lined channel which is located approximately 4.5 miles northwest of the facility. The facility was reinforced and upgraded to meet requisite building code standards in 1995 and the main building is not expected to expose people or property to geologic hazards such as earthquakes, landslides, mudslides, or ground failure. No major fault is known to cross the facility.

Analysis as to whether or not project activities would:

- a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

Impact Analysis: The proposed project will not involve the on-site buildings. The GWETS will be constructed outside and away from the existing building and is not expected to cause substantial adverse effects, including the risk of loss, injury, or death.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to [Division of Mines and Geology Special Publication 42](#).

Impact Analysis: The proposed project will not involve the on-site buildings. The GWETS will be constructed outside and away from the existing buildings and is not expected to cause any exposure to people or structures due to the effects of surface rupture. No fault is known to cross the facility, therefore, the project is unlikely to be affected by surface rupture.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- ii) Strong seismic ground shaking?

Impact Analysis: The proposed project will not involve the building. The GWETS will be designed and installed following relevant California seismic codes. The GWETS will be constructed outside and away from the existing buildings and is not expected to cause any exposure to people or structures due to the effects of ground shaking. Strong seismic shaking is always a possibility in the LA basin, however, the proposed project is unlikely to expose people or structures to loss, injury, etc., as a result of such shaking.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- iii) Seismic-related ground failure, including liquefaction?

Impact Analysis: The proposed project will not involve the building. The GWETS will be constructed outside and away from the existing building and is not expected to cause any exposure to people or structures due to the effects of ground failure. The facility's site is level and groundwater is at 95 feet bgs, which prevents liquefaction issues.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

iv) Landslides?

Impact Analysis: The proposed project will not involve the building. The construction of a GWETS will be constructed outside and is not expected to cause any exposure to people or structures due to the effects of landslides. The facility's site is located on level ground , which prevents landslides issues.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

b. Result in substantial soil erosion or the loss of topsoil?

Impact Analysis: No construction activities are proposed that would involve substantial or significant grading. The trenching area will be paved with concrete or asphalt to match the original site condition, therefore, no soil erosion or the loss of topsoil is expected.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Impact Analysis: The proposed project will not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project. There will be no potential for project-related on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

d. Be located on [expansive soil](#), as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Impact Analysis: The proposed project will not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), and will not, therefore, create substantial risks to life or property

Conclusion:

- Potentially Significant Impact
- Less Than Significant With Mitigation Incorporated
- Less Than Significant Impact
- No Impact

- e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Impact Analysis: The facility is connected to a POTW sewer, and therefore the proposed project will not involve the use of septic tanks or alternative waste water disposal systems. Extracted groundwater would be pumped to an aboveground treatment system, which utilizes bag and/or cartridge filters for particulate filtration followed by AGAC for VOC abatement. Treated groundwater would be discharged either to a POTW sewer, to the storm drain under a National Pollutant Discharge Elimination System (NPDES) permit or re-injected into the groundwater table under a WDR permit program.

Conclusion:

- Potentially Significant Impact
- Less Than Significant With Mitigation Incorporated
- Less Than Significant Impact
- No Impact

*References Used:*

1. Current Condition Report, Rho-Chem Facility, Geomatrix Consultants, Inc., (GMX) February 7, 2003 (Page 27-29)
2. Corrective Measures Study Report, Rho-Chem Facility, 425 Isis Avenue, Inglewood, California, Amec Foster Wheeler Environment & Infrastructure, Inc., 2018.
3. Geohydrology, Geochemistry, and Ground-Water Simulation-Optimization of the Central and West Coast Basins, Los Angeles County, California, Water-Resources Investigations Report 03-4065, U.S. Geological Survey, 2003,.
4. California Department of Water Resources (DWR), 1961, Planned Utilization of the Groundwater Basins of the Coastal Plain of Los Angeles County, Appendix A, Groundwater Geology, Bulletin 104, June.
5. California's Groundwater Bulletin 118 – Coastal Plain of Los Angeles County Groundwater Basin, West Coast Subbasin, DWR, February 27, 2004.

## 8. Greenhouse Gas Emissions

Project Activities Likely to Create an Impact: Implementation of the proposed project consists of construction of the GWETS, operation and maintenance of the SVE system and GWETS as well as routine groundwater monitoring. Activities which likely would create an impact on greenhouse gas emissions includes:

1. Construction activities during installation of the GWETS.
2. Operation of the SVE system and GWETS.
3. Offsite transportation of waste generated during construction of the GWETS and during O&M of the SVE system and GWETS
4. Field staff commuting to the site for routine O&M and groundwater monitoring
5. Delivery of materials and supplies (AGAC, filters, persulfate) for the SVE system and GWETS by vendors.

Description of Baseline Environmental Conditions: In the absence of an adopted local Greenhouse Gas (GHG) reduction ordinance or other requirement, such as an element of the General Plan, the SCAQMD's tiered approach is used to determine whether GHG emissions from a project are significant. Under this approach, a project emissions will include direct, indirect, and, to the extent information is available, life cycle emissions during construction and operation. Construction emissions will be amortized over the life of the project, defined as 30 years, added to the operational emissions, and compared to the applicable interim GHG significance threshold tier 1. The

following description of Tiers 1 through 3 is taken from the SCAQMD's Interim CEQA GHG Significance Threshold guidance document.

- Tier 1 -- consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA. If the project qualifies for an exemption, no further action is required. If the project does not qualify for an exemption, then it would move to the next tier.
- Tier 2 -- consists of determining whether or not the project is consistent with a GHG reduction plan that may be part of a local general plan. The concept embodied in this tier is equivalent to the existing concept of consistency in CEQA Guidelines §§15064(h) (3), 15125(d), or 15152(a). The GHG reduction plan must, at a minimum, comply with AB 32 GHG reduction goals; include emissions estimates agreed upon by either CARB or the AQMD, have been analyzed under CEQA, and have a certified Final CEQA document. Further, the GHG reduction plan must include a GHG emissions inventory tracking mechanism; process to monitor progress in achieving GHG emission reduction targets, and a commitment to remedy the excess emissions if GHG reduction goals are not met (enforcement).

If the proposed project is consistent with the qualifying local GHG reduction plan, it is not significant for GHG emissions. If the project is not consistent with a local GHG reduction plan, there is no approved plan, or the GHG reduction plan does not include all of the components described above, the project would move to Tier 3.

- Tier 3 -- establishes a screening significance threshold level to determine significance using a 90 percent emission capture rate approach as described above.

Under Tier 3, the 90 percent capture rate GHG significance screening level in Tier 3 for stationary sources was derived using the following methodology. Using AQMD Annual Emission Reporting (AER) Program staff compiled reported annual natural gas consumption for 1,297 permitted facilities for 2006 through 2007 and rank-ordered the facilities to estimate the 90th percentile of the cumulative natural gas usage for all permitted facilities. Approximately 10 percent of facilities evaluated comprise more than 90 percent of the total natural gas consumption, which corresponds to 10,000 metric tons of CO<sub>2</sub> equivalent emissions per year (MTCO<sub>2</sub>eq/yr) (the majority of combustion emissions are comprised of CO<sub>2</sub>). This value represents a boiler with a rating of approximately 27 million British thermal units per hour (mmBtu/hour) of heat input, operating at an 80 percent capacity factor. It should be noted that this analysis did not include other possible GHG pollutants such as methane, N<sub>2</sub>O; a life-cycle analysis; mobile sources; or indirect electricity consumption.

There is no need to discuss tiers higher than Tier 3, as further explained below.

Analysis as to whether or not project activities would:

- a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Impact Analysis: GHG emissions associated with the proposed project were estimated using guidance and emission model CalEEMod provided by the SCAQMD. During construction of the GWETS, direct GHG emissions arise from operation of drilling and construction equipment, transporting of waste off site, delivery of construction materials as well as daily commute of workers in truck and passenger vehicles. The construction of the GWETS would generate an estimated 133 metric tons of unmitigated CO<sub>2</sub> equivalent emissions per year, well below the significance threshold (10,000 metric tons of CO<sub>2</sub> equivalent emissions per year (MTCO<sub>2</sub>eq/yr), established by the SCAQMD in Tier 3.

During operational phase, GHG emissions arise from electricity and water usage (indirect emissions) and truck and passenger vehicle traffic (direct). The SVE system uses an estimated average 80,630 kWhr of electricity per month. The estimated monthly electricity usage for the GWETS is approximately 3,600 kWhr. Vehicle traffic includes

weekly commute to the site for routine O&M of the SVE system and GWETS and delivery of materials and supplies by various vendors. Based on emission factors provided in the CalEEMod, GHG emissions based on this usage are calculated to be 3,505 metric tons of CO<sub>2</sub> equivalent emissions per year, well below the significance threshold established by the SCAQMD in Tier 3.

These assumptions are based on typical daily maximums, and thus are conservative and overstate annual average conditions. Therefore, the GHG generated from this project will not have a significant impact on the environment.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- b. Conflict with an applicable plan, policy or [regulation](#) adopted for the purpose of reducing the emissions of greenhouse gases?

Impact Analysis: The applicable policy is the SCAQMD's GHG policy, which is to reduce GHG emissions to stabilize climate change. As part of this policy, the SCAQMD established performance standards and target GHG reduction objectives that will ultimately contribute to reducing GHG emissions. Further, the SCAQMD policy is to also fully implement the Governor's Executive Order S-3-05 and the Global Warming Solutions Act of 2006 (AB 32). There is to reduce GHG emissions 80 percent below 1990 levels or 90 percent below current levels by 2050. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for projects where the SCAQMD is lead agency.

This Project is consistent with the SCAQMD's policy and the Governor's Executive Order and AB 32 because the Project has been designed to ensure that operational, construction, and electricity-related GHG emissions are below the SCAQMD's GHG thresholds.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

*References Used:*

1. CEQA and Climate Change, Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, California Air Pollution Control Officers Association (CAPCOA), January 2008.
2. California Climate Action Registry, 2009. General Reporting Protocol, version 3.1.
3. South Coast Air Quality Management District, 2008. Interim CEQA GHG Significance Threshold for Stationary Sources, Rules, and Plans for use by the AQMD.

## 9. Hazards and Hazardous Materials

Project Activities Likely to Create an Impact: The operation of the SVE system and GWETS.

Description of Baseline Environmental Conditions: The Rho-Chem facility operates as a solvent recycler and is obligated to comply with the DTSC permit conditions /limitations for the safe management of hazardous wastes and

materials. It is located in a commercial/manufacturing area. There are only three residences within ¼ mile, and these are primarily used for businesses. The facility routinely transports, uses and treats hazardous and non-haz materials. A major transportation artery, Manchester Boulevard, is located within ½ block and links to the 405 Freeway within 1 mile of the facility. Therefore, transportation of any hazardous materials from the project would not be on residential streets.

As opposed to the routine transport of liquid wastes to the facility for treatment as part of its permitted operations, hazardous material or waste discharge due to the proposed project would be limited to chemical condensate generated by the GEO C3 cryogenic-compression-condensation vapor treatment system (C3 System) operating as part of the SVE system and persulfate (stock solution in totes or solid stored supersacks) stored inside the GWETS compound for groundwater treatment. Soil cuttings from well installation and trenching for underground piping of the GWETS are anticipated to be characterized as non-hazardous although a small potential for hazardous classification exists. The purged groundwater generated during routine groundwater sampling events might be hazardous.

Chemical condensate generated by the C3 System will be transferred and stored in chemical totes and managed by the on-site permitted hazardous waste management unit(s) or recycled in the existing facility treatment operations at a frequency of at least every 90 days. Persulfate will be delivered to the site periodically by authorized hazardous material transporters. Persulfate will be stored inside the secured GWETS compound under a Los Angeles County Fire Department Certified Unified Program Agency (CUPA) permit. Soil cutting and purged groundwater profiled as hazardous waste will be transported off-site by a certified hazardous waste hauler with appropriate hazardous waste manifest.

There are limited health hazards or safety risks that could potentially impact the surrounding community due to hazardous material or waste discharge related to this project. The health and safety plan, monitoring plans and contingency plan that will be part of the GWETS design documents provide detailed measures to prevent or limit the hazardous material or waste discharged into the environment. The contingency plan at the site provides procedures to control or minimize the damage if spill or fire occurred. The facility is also connected with the private, local, and state emergency response groups within short time periods (approximately 15 to 30 minutes response time) to minimize any potential impacts from the hazards. In addition, the personnel who will implement the cleanup activities will be trained regarding potential safety and health risks associated with the activities as described in the CM-Health and Safety Plan.

There is no existing or proposed school within ¼ mile of the facility. The proposed project is not 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, it would not create a significant hazard to public or the environment. The proposed project will not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.

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 project will not create a significant hazard to the public or the environment throughout the routine transport, use or disposal of hazardous materials. The hazardous materials associated with the proposed project that requires transportation includes persulfate for the GWETS, condensate collected from the C3 System, and small amount of soil cutting and purged groundwater. Persulfate will be delivered to the site by a certified hazardous chemical transporter. Any waste from the selected CM alternative that needs to be sent off-site for hazardous waste disposal or treatment will be conducted at a frequency of at least every 90 days. A certified hazardous waste hauler with appropriate hazardous waste manifests will be used for transportation of any generated wastes that are shipped off-site. These wastes will be treated or disposed of at approved hazardous waste management facility.

Conclusion:

- Potentially Significant Impact
- Less Than Significant With Mitigation Incorporated
- Less Than Significant Impact
- No Impact

- b. 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?

Impact Analysis: The project will not 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. The personnel who will implement the proposed project will be trained regarding potential safety and health risks associated with the activities as described in the CM-Health and Safety Plan. Daily safety meetings will be held prior to on-site work. The health and safety training and monitoring plans will prevent or limit the hazardous material or waste discharged into the environment. The implementation of a contingency plan at the site will control or minimize the damage if spill or fire occurs. The facility is contracted with the private, local, and state emergency response groups to provide emergency response within short time periods (approximately 15 to 20 minutes response time) to control/respond to the upset and accident conditions to minimize any resultant hazards .

Conclusion:

- Potentially Significant Impact
- Less Than Significant With Mitigation Incorporated
- Less Than Significant Impact
- No Impact

- c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within ¼ mile of an existing or proposed school?

Impact Analysis: There is no existing or proposed school within ¼ mile. Impacted soil vapor and groundwater will be treated before being emitted or discharged from the treatment system. Emissions from the SVE system is permitted by SCAQMD. The GWETS will be permitted by the Los Angeles Regional Water Quality Control Board for injecting treated groundwater under a Waste Discharge Requirements, and by the Sanitation District of Los Angeles County for discharging to a POTW or by the Los Angeles Regional Water Quality Control Board for discharging to storm drains under a NPDES permit.

Conclusion:

- Potentially Significant Impact
- Less Than Significant With Mitigation Incorporated
- Less Than Significant Impact
- No Impact

- d. 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?

Impact Analysis: The proposed project is not 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, will not create a significant hazard to public or the environment.

Conclusion:

- Potentially Significant Impact

- Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- e. 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, would the project result in a safety hazard for people residing or working in the project area?

Impact Analysis: The proposed project will not create a safety hazard to people residing or working in the project area.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

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

Impact Analysis: The proposed project is not located on a private airstrip and, as a result, would not create a safety hazard to people residing or working in the project area.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- g. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

Impact Analysis: Neither the construction, operation or monitoring associated with the proposed project will impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- h. 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?

Impact Analysis: Neither the construction, operation or monitoring associated with the proposed project will result in a significant risk of loss, injury, or death involving wildland fires.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

i. Result in human exposure to Naturally Occurring Asbestos?

Impact Analysis: The site is not located in an area containing naturally occurring asbestos.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

*References Used:*

1. Current Condition Report, Rho-Chem Facility, Geomatrix Consultants, Inc., (GMX) February 7, 2003 (Page 27-29)
2. Corrective Measures Study Report, Rho-Chem Facility, 425 Isis Avenue, Inglewood, California, Amec Foster Wheeler Environment & Infrastructure, Inc., 2018

## 10. Hydrology and Water Quality

Project Activities Likely to Create an Impact: No, the proposed project for installing, operating, and monitoring of the SVE system and GWETS will not create an impact on the hydrology and water quality at the facility.

Description of Baseline Environmental Conditions: The site is located in the Coastal Plain of the Los Angeles basin, within the northern portion of the West Coast subbasin, referred to as the West Coast Basin. Two other subbasins surround the West Coast Basin: the Santa Monica Basin to the north, and the Central Basin to the east (U.S. Geological Survey, 2003). The upper 500 to 1,000 feet of sediments in the West Coast Basin encompass all of the San Pedro and Lakewood Formations, which contain the primary water-supply aquifers. The primary aquifers in the West Coast Basin used for water supply, from oldest to youngest (deep to shallow), consist of the Silverado, Lynwood, and Gage aquifers. These aquifers are separated by regionally extensive aquitards or low-permeability units. The Silverado aquifer, which ranges from 100 to 500 feet thick, is the most productive aquifer in the West Coast Basin (DWR, 2004). Regionally, first-encountered groundwater occurs within the shallow semi-perched aquifer (also referred to as the water table groundwater zone) of the Lakewood Formation. The semi-perched aquifer is not used for municipal water supply.

The West Coast Basin is bounded on the west and south by the Pacific Ocean. The aquifers are also intersected by structural features and faults that act as partial barriers to groundwater flow: the Newport-Inglewood Fault Zone separating the West Coast and Central basins, and the Charnock Fault in the West Coast Basin. As a result of these features, the depths and thickness of these aquifers vary across the region. The Charnock Fault offsets the San Pedro Formation Lynwood and Silverado aquifers, but does not extend into the Gage aquifer. The Charnock Fault is present in the northern half of the West Coast Basin and does not appear to be present in the southern half of the West Coast Basin. Groundwater elevations from upper San Pedro Formation wells are consistent with this hypothesis and show a groundwater elevation offset in the northern West Coast Basin (Water Replenishment District of Southern California [WRD], 2014, 2015).

Hydrogeologic units beneath the site to about 250 feet bgs consist of Lakewood Formation units, and include a semi-perched aquifer (Zone 3) and the Gage aquifer (Zone 5). The semi-perched aquifer is separated from the underlying Gage aquifer by a fine-grained unit (Zone 4). The Gage aquifer is in turn separated from the underlying San Pedro Formation Lynwood aquifer by another fine-grained unit (Zone 6). Groundwater is first encountered in the semi-perched aquifer (Zone 3) at about 90 to 100 feet bgs at the site and in the vicinity of the site. Based on review of the groundwater elevations collected between 1994 and 2016 from the semi-perched aquifer wells that are part of the site's groundwater monitoring network, interpreted historical groundwater flow directions in the semi-perched aquifer is generally to the

north-northeast. In the underlying Gage aquifer, interpreted groundwater flow direction is generally to the south-southeast, based on the groundwater elevations collected from the Gage aquifer wells that are part of the site's groundwater monitoring network.

Based on review of analytical data for groundwater samples collected between 1994 and 2016 from the semi-perched aquifer wells that are part of the site's groundwater monitoring network, concentrations of PCE and TCE greater than 10,000 µg/L were detected in the semi-perched aquifer at all three on-site wells (MW-2, MW-3, MW-11) and in discrete-depth groundwater samples collected from the boring GCW-5 near MW-11. Detected concentrations of PCE and TCE at off-site wells in the semi-perched aquifer are presented below (using a logarithmic order of magnitude) based on their hydraulic position relative to the site:

- Upgradient off-site wells MW-9 and MW-15 south of the site: in the range of 1,000 µg/L to greater than 10,000 µg/L;
- Upgradient to cross-gradient off-site well MW-8 southeast of the site: in the range of 1,000 µg/L to greater than 10,000 µg/L
- Cross-gradient off-site well MW-4 southeast of the site: in the range of 100 µg/L to greater than 10,000 µg/L;
- Cross-gradient off-site well MW-14 southeast of the site: in the range 1 µg/L;
- Cross-gradient off-site well MW-10 to the west of the site on the transfer station: in the range of 1,000 µg/L to greater than 10,000 µg/L;
- Cross-gradient off-site wells GCW-7 and GCW-8 to the west of the site near MW-10 on the transfer station: in the range of 100 µg/L to greater than 1,000 µg/L (in discrete-depth groundwater samples collected from the borings for GCW-7 and GCW-8);
- Cross-gradient off-site well MW-12 to the west-northwest of the site: in the range of 100 µg/L to greater than 1,000 µg/L;
- Downgradient well MW-7 to the east-northeast of the site: in the range of 100 µg/L to greater than 10,000 µg/L; and
- Downgradient well MW-6 to the northeast of the site: generally in the range of 1 µg/L to less than 1,000 µg/L, with one sample just above 1,000 µg/L.

Of the off-site wells listed above, a notable increase in PCE and TCE concentrations to just above 10,000 µg/L began in August 2014 at one downgradient well MW-7. This well is located adjacent to the former Avaya property with known soil and groundwater impacts related to VOCs. TCE concentrations in the semi-perched aquifer were in the range of greater than 1,000 µg/L at the former Avaya property approximately 600 feet east to northeast of the site, and in the range of 100 µg/L to greater than 10,000 µg/L at the Glasgow property approximately 825 feet northeast of the site. The PCE concentrations at these two properties were in the range of 100 µg/L to just above 1,000 µg/L. Based on the known soil and groundwater impacts at these two downgradient properties, the detections of TCE and PCE in the semi-perched aquifer beneath these properties are likely the result of contributions from releases at these two properties.

Concentrations of detected PCE and TCE in the discrete-depth groundwater samples collected from the Gage aquifer at on-site wells GCW-4 and GCW-5 near MW-11 were in the range of 10 µg/L to 100 µg/L. Detected concentrations of PCE and TCE at off-site wells in the Gage aquifer are presented below based on their hydraulic position relative to the site:

- Up to cross gradient Gage aquifer well MW-6G to the northeast of the site: in the range of 1 µg/L to 10 µg/L; and
- Downgradient off-site wells MW-4G and MW-9G to the southeast and south of the site: in the range of 1 µg/L to just above 300 µg/L.

The site is located in a highly industrial area, with a number of sites undergoing environmental assessment and remediation for VOCs. As such, detections of PCE and TCE in the semi-perched and Gage aquifers monitoring wells located hydrologically upgradient of the site and farther off site are likely attributed to regional groundwater impacts or impacts from other sites, some with known soil and groundwater impacts.

The most recent Watermaster report (DWR, 2014) indicates that four groundwater extraction wells (all of which are industrial water supply wells) are located within a radius of approximately 2 miles of the site. Three public water supply wells (owned by the City of Inglewood) and seven industrial water supply wells (owned by others) are located approximately 2 to 3 miles north and southeast of the site that reported groundwater extraction between July 2013 and June 2016 (DWR, 2014 and WRD, 2016). The public water supply wells extract groundwater from deeper aquifers (the Lynwood and Silverado aquifers at depths of approximately 300 to 325 feet and 400 to 600 feet, respectively). These deeper aquifers are separated from the Gage aquifer by regionally extensive thick aquitards or low-permeability stratigraphic units (up to 100 feet thick). Recent analytical data provided by the WRD for two drinking water supply wells (3S/14W-10F02S and 3S/14W-03D03S), and three industrial water supply wells (3S/14W-03K04S, 3S/14W-03K05S, and 3S/14W-09M01S) located 2 to 3 miles from the site indicated no detection of VOCs (WRD, 2016).

### **Surface Water**

There are no surface waters within 1 mile of the site. The nearest surface water body appears to be the Centinela Park Reservoir located approximately 2 miles to the northeast. Surface water run-off at the site is collected by storm drain catch basins on-site and either treated on-site or directed to off-site storm water drains.

This proposed project is directed at removing contaminated soil gas from the vadose zone beneath the facility and contaminated groundwater from the semi-perched aquifer beneath the facility and downgradient of the facility. This contaminated soil gas and groundwater might otherwise find its way downward into the groundwater and Gage aquifer, respectively. Therefore, the proposed project will act to prevent further degradation of water quality. However, the proposed project will not involve nor result in any physical change of any surface water body, water course, nor wetland nor will it change any currents, courses of direction of water movement, in either marine or fresh water, alter the flow of flood waters or expose people to water-related hazards. There is no riparian land, rivers, streams, water courses, or wet-lands under state or federal jurisdiction at or near the facility. Further, since the proposed project does not include any grading, no alterations of any surface water bodies, etc. would be possible in any event. There is no “downstream” from the facility since there are no nearby surface water courses. Moreover, there are no drinking water intakes along any natural surface water bodies within 15 miles of the site. The California Department of Fish and Game, has indicated in its Natural Diversity Data Base (October 19, 1991) that there are no sensitive environments located within 15 miles “downstream” of the facility.

No discharge of waste waters will be made to any marine or fresh waters. On-site surface run-off, a.k.a. non-industrial waste water (rainwater) and storm water in the site vicinity is reportedly conveyed via subsurface storm drains to the Dominguez Channel, located approximately 3.5 miles southeast of the site. The Dominguez Channel eventually discharges into San Pedro Bay, located approximately 15 miles south/southeast of the site. The proposed project does not include any grading or paving and therefore will not result in changes in absorption rates, drainage patterns, or the rate, interfere with groundwater recharge, and amount of surface run-off. The facility is not located within a 100-year or 500-year flood plain, is not near any topographic expression, is not near any surface water bodies, is 5 miles from the ocean, and is at an elevation of 200 feet amsl, none of the flooding, seiching, mudflow, or tsunami-related concerns are applicable. The proposed project will involve the construction of approximately 625 square feet area concrete pad for the GWETS on the existing concrete of the southwestern corner of the site and associated shallow (<2 feet depth) underground piping that connect the injection and extraction wells with the GWETS and that connects the GWTP with the POTW sewer line or storm drain. This will not result in alterations to the course or flow of flood waters.

The proposed project would extract groundwater which would be pumped to an aboveground treatment system. The GWETS would utilize bag and/or cartridge filters for particulate filtration followed by AGAC for VOC abatement. Treated groundwater would be discharged either to a POTW sewer, re-injected under a WDR permit program, or discharged to a storm drain under a NPDES permit. Groundwater reinjection may also be used as an enhancement to this technology to assist in controlling groundwater gradients and/or to create a groundwater recirculation system. The proposed project will not discharge extracted groundwater into surface waters. As such alteration of surface water quality, including but not limited to, temperature, dissolved oxygen or turbidity will not occur.

Analysis as to whether or not project activities would:

- a. Violate any [water quality standards or waste discharge requirements](#)?

Impact Analysis: As a component of the selected CM alternative, the proposed project is directed at removing contaminated soil and soil gas from the vadose zone and thereby reducing the threat to the underlying groundwater as a result of leaching. The contaminants would be primarily captured by the SVE system as either a chemical condensate or VGAC adsorbate and transported off-site.

As a component of the selected CM alternative, extracted groundwater would be pumped to an aboveground treatment system which utilizes bag and/or cartridge filters for particulate filtration followed by AGAC for VOC abatement. Treated groundwater would be discharged either to a sewer line under a POTW permit, re-injected to groundwater under a WDR permit program, or discharged to a storm drain near the GWETS compound under a NPDES permit after further treatment to meet the NPDES discharge limitations. Groundwater reinjection may also be used as an enhancement to this technology to assist in controlling groundwater gradients and/or to create a groundwater recirculation system.

The WDR permit requires that the treated groundwater to be injected into subsurface meet treatment criteria specified in the WDR permit, and the re-injection of treated groundwater be limited to the same aquifer where the impacted groundwater was withdrawn from for treatment. Re-injection of treated groundwater to which material or amendments have been added will be limited to the same aquifer and within the treatment zone. The WDR permit also requires that an adequate groundwater monitoring network is in place to monitor and evaluate the effect of the re-injection to groundwater quality outside of the treatment zone. Under the POTW permit, discharge to the sewer system will meet the regulated discharge limitations so that the discharge will not negatively impact the operation of the sewer treatment plant. Under a NPDES permit, groundwater will be treated to meet NPDES discharge limitations so that the discharge does not have negative impact on the water quality of the surface water body to which the storm drains are connected to.

Conclusion:

- Potentially Significant Impact
- Less Than Significant With Mitigation Incorporated
- Less Than Significant Impact
- No Impact

- b. Substantially deplete [groundwater](#) supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Impact Analysis: As a component of the selected CM alternative, extracted groundwater would be pumped to an aboveground treatment system and discharged either to a POTW sewer, re-injected under a WDR permit, or discharged to a storm drain under a NPDES permit. A majority of the groundwater extracted from the aquifer will be re-injected to the same aquifer. Groundwater reinjection is used as an enhancement to this technology to assist in controlling the hydraulic of groundwater flow to minimize displacement of impacted groundwater, and to create groundwater recirculation to enhance distribution of bio-amendments or oxidant within the treatment zone. Treated groundwater will be discharged into the POTW sewer or storm drain only if the extracted groundwater volume exceeds the volume of groundwater that can be re-injected back to aquifer. Therefore, groundwater will be extracted at a rate that will not result in a depletion of groundwater supplies.

There is no grading, coverage of bare ground surface or diversion of surface water run-off from the facility proposed as part of the project. Therefore, the proposed project will have no effect on groundwater recharge. Any water generated from vapor condensate will have negligible effect on recharge since the soil moisture that evaporated into the removed gas is trapped beneath paving to begin with and moreover will be of insignificant volume (on the order of a few ten's of gallons).

Conclusion:

- Potentially Significant Impact
- Less Than Significant With Mitigation Incorporated
- Less Than Significant Impact
- No Impact

- c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off-site?

Impact Analysis: The proposed project does not include any grading and the facility and surrounding street area are fully paved as it now exists. Therefore, the proposed project will not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off-site.

Conclusion:

- Potentially Significant Impact
- Less Than Significant With Mitigation Incorporated
- Less Than Significant Impact
- No Impact

- d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site?

Impact Analysis: The proposed project does not include any grading and the facility is fully paved as it now exists. Therefore, the proposed project will not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site.

Conclusion:

- Potentially Significant Impact
- Less Than Significant With Mitigation Incorporated
- Less Than Significant Impact
- No Impact

- e. Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?

Impact Analysis: The proposed project will not create or contribute run-off water at all. Therefore there would be no effect such as exceeding the capacity of existing or planned storm water drainage systems or providing substantial additional sources of polluted runoff.

Conclusion:

- Potentially Significant Impact
- Less Than Significant With Mitigation Incorporated
- Less Than Significant Impact
- No Impact

- f. Otherwise substantially degrade water quality?

Impact Analysis: The proposed project will remove contaminated soil gas and semi-perched groundwater and thereby prevent it from migrating downward and degrading the water quality of underlying groundwater. There will be no surface water run-off effects from the proposed project since any spillage will be within the existing containment systems designed to handle such occurrences from site operations.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- g. Place housing within a 100-year flood hazard area as mapped on a [federal Flood Hazard Boundary](#) or [Flood Insurance Rate Map](#) or other flood hazard delineation map?

Impact Analysis: No structures are being proposed as part of this project which would be within a 100-flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map. The facility is not within a 100-year flood hazard area. The GWETS will not be constructed as a building structure, and moreover will have a small footprint, no more than 625 square feet, and will be placed inside a secondary containment.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- h. Place within a 100-flood hazard area structures which would impede or redirect flood flows?

Impact Analysis: No structures are being proposed as part of this project which would be within a 100-flood hazard area which would impede or redirect flood flows. The facility is not within a 100-year flood hazard area. The GWETS will not be constructed as a building structure and moreover will have a small footprint, no more than 625 square feet, and will be placed inside the secondary containment.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Impact Analysis: The project does not include construction or reliance on a levee or a dam. Neither levees nor dams exist within a several mile radius of the facility.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact

No Impact

j. Inundation by seiche, tsunami or mudflow?

Impact Analysis: The proposed project is many miles inland and not subject to threat of tsunami. There are no adjoining surface water bodies, not even swimming pools, which can be affected by seiching. The facility is located in flat terrain with no nearby source of material to sustain a mudflow. Therefore, the proposed project will not be subject inundation by sieche, tsunami or mudflow.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

*References Used:*

1. Current Condition Report, Rho-Chem Facility, Geomatrix Consultants, Inc., (GMX) February 7, 2003 (Page 27-29)
2. Corrective Measures Study Report, Rho-Chem Faciltiy, 425 Isis Avenue, Inglewood, California, Amec Foster Wheeler Environment & Infrastructure, Inc., 2018.
3. Guidelines for Evaluating and Mitigating Seismic Hazards in California, Department of Conservations, Division of Mines and Geology, March 13, 1997.
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5. California's Groundwater Bulletin 118 – Coastal Plain of Los Angeles County Groundwater Basin, West Coast Subbasin, DWR, February 27, 2004.
6. Watermaster Service in the West Coast Basin, Los Angeles County, July 1, 2013 – June 30, 2014, DWR, Southern Region, September 2014.
7. Well Production, Water Level, and Water Quality Reports, <http://gis.wrd.org/wrdmap/index.asp>, Water Replenishment District of Southern California (WRD), July 2016.
8. Regional Groundwater Monitoring Report, Water Year 2012-2013, Central and West Coast Basins, Los Angeles County, California, WRD, April 2014.
9. Regional Groundwater Monitoring Report, Water Year 2013-2014, Central and West Coast Basins, Los Angeles County, California, WRD, February 2015.

## 11. Land Use and Planning

Project Activities Likely to Create an Impact: The proposed project will not create any impact on the local land use and planning or the status of the facility.

Description of Baseline Environmental Conditions: The site is located in the City of Inglewood which is part of the metropolitan area of Los Angeles County. The City of Inglewood Urban Water Management Plan, dated August 2015, indicates that in 2015 the population in the city is estimated of approximately 115,966 people. The site is designated or zoned as M-1, which is industrial. The site is located south of Manchester Avenue. Land use in the vicinity of the site is zoned for industrial and commercial purposes. Based on the existing conditional use permit, the facility is compatible with existing zoning both for it and surrounding area.

This project does not include a change of the land use designation. Therefore, it will not conflict with any applicable land use plan such as the General Plan, zoning ordinance, regulation, or policy of the City of Inglewood which has jurisdiction over the proposed project. The facility is not within the coastal zone and is not subject to any local coastal program. There is no any applicable City of Inglewood habitat conservation plan or natural community conservation plans. Finally, this proposed project does not contain any elements requiring grading, paving, etc. of unpaved area, which would affect habitat or community.

Analysis as to whether or not project activities would:

a. Physically divide an established community?

Impact Analysis: The proposed project will not physically divide an established community.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Impact Analysis: The proposed project will not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

c. Conflict with any applicable habitat conservation plan or natural community conservation plan?

Impact Analysis: The proposed project will not conflict with any applicable habitat conservation plan or natural community conservation plan.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

*References Used:*

1. Current Condition Report, Rho-Chem Facility, Geomatrix Consultants, Inc., (GMX) February 7, 2003 (Page 27-29)
2. Corrective Measures Study Report, Rho-Chem Facility, 425 Isis Avenue, Inglewood, California, Amec Foster Wheeler Environment & Infrastructure, Inc., 2018
3. 2015 Urban Water Management Plan, City of Inglewood, August 2016.

## 12. Mineral Resources

Project Activities Likely to Create an Impact: No, the proposed project for operating and monitoring of the SVE system and construction, operation, and monitoring of the GWETS will not create an impact on the mineral resources of the site.

Description of Baseline Environmental Conditions: The facility is located in an industrial area which is characterized by large industrial buildings and paved parking lots and City streets. Limited shallow trenching and repaving will likely occur on City streets for the GWETS conveyance piping. Neither this facility nor the surrounding area are currently used for the extraction or use of mineral resources.

No locally-important mineral resource recovery site is delineated on any local general plan, specific plan or other land use plan for the City of Inglewood. Moreover, no grading or excavation is proposed, only shallow trenching and minor paving, therefore, this proposed project will not result in the loss of availability of any resource.

Analysis as to whether or not project activities would:

- a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Impact Analysis: This proposed project will not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- b. Result in the loss of availability of a known [mineral resource](#) that would be of value to the region and the residents of the state?

Impact Analysis: The proposed project will not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

*References Used:*

1. Current Condition Report, Rho-Chem Facility, Geomatrix Consultants, Inc., (GMX) February 7, 2003 (Page 27-29)
2. Corrective Measures Study Report, Rho-Chem Facility, 425 Isis Avenue, Inglewood, California, Amec Foster Wheeler Environment & Infrastructure, Inc., 2018

### 13. Noise

Project Activities Likely to Create an Impact: Operating SVE system and GWETS.

Description of Baseline Environmental Conditions: The facility is located in a primarily industrial area which is characterized by airport and vehicle noise. In addition, the facility itself operates heavy machinery and equipment which makes noise as do some of the neighboring industrial sites. The closeness of the airport means that there can be substantial noise from aircraft landing and taking off and along the flight path surrounding the airport. A two-lane surface street is located in front of the facility. The foregoing represents ambient sound for the area of the facility.

The ambient sound at the property line is not expected to be significantly increased since the site is currently operating and the proposed project is set back several hundred feet from the 'two-lane street. Intermittent construction of the extraction and treatment components of the GWETS and installation of the extraction and injection wells portion for the GWETS will last for 1-2 months. The construction noise will be short term and will be for a few days on and off during that period. Construction of the GWETS will involve the use of several pieces of equipment that will create noise. These include a truck-mounted drill rig, jack hammer or concrete corer, and light construction equipment such as forklifts, bobcats and small cranes.

The main operating components of the SVE system include a blower for creating negative pressure in the subsurface and the C3 System which treats the contaminants above ground. The C3 System unit operates well below 65 dB(A) while the proposed blower operates at 75 dB(A) without shielding or barrier. Shielding was installed to provide a noise barrier. These pieces of equipment, with appropriate shielding for the blower, are compatible with the existing baseline noise caused by industrial activities in the area, the air traffic related to the Los Angeles International Airport, and vehicle traffic on surrounding streets. Noise from components of the GWETS are expected to be negligible. Moreover, the equipment is at a corner of the facility which is further baffled on one side by parked transport vehicles in Rho-Chem's transport yard and on another by a two-story concrete wall, with no openings, of an adjoining bakery. The equipment will be some 10 to 20 feet from the neighboring bakery and 50 feet from the nearest point of the Rho-Chem building. It will be some 300 feet from the nearest street. This proposed project will not expose persons to or generate noise levels in excess of standards established by the City of Inglewood as being 65 dB(A) in its local general plan and noise ordinance, or applicable standards of other agencies (i.e. OSHA). It will not generate excessive ground-borne vibration or ground-borne noise levels. This proposed project will not have a substantial temporary, or periodic, or permanent increase in ambient noise levels in the vicinity above levels existing without the project. For example, passing vehicles, including motorcycles, on Isis Street exceed 75 dB(A). This project will not have any site-specific or cumulative noise impacts.

During the operation phase, a small number of delivery vehicles will visit the project location to deliver consumables and haul off wastes described elsewhere in this document. Other project-related trips are passenger vehicles for technician visits for equipment maintenance, which may occur once per week, as well as two to three days quarterly of annually sampling activities over the proposed project period. Vehicle visits are not expected to impact existing noise levels. It is expected that the noise created by sampling activities will be well below 65 dB(A) and will not increase either ambient or peak noise levels of the site.

Analysis as to whether or not project activities would result in:

- a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Impact Analysis: This proposed project will not result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, or ambient existing noise.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Impact Analysis: This proposed project will not result in exposure of persons to or generation of excessive ground-bourn vibration or ground-bourn noise levels.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- c. A substantial permanent increase in ambient noise levels in the vicinity above levels existing without the project?

Impact Analysis: This proposed project will not result in substantial permanent increase in ambient noise levels in the vicinity above levels existing without the project.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Impact Analysis: The noise generated during operation of the SVE system is expected to be no more than the noise level from the routine operation of the facility. This proposed project will not result in substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- e. 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, would the project expose people residing or working in the project area to excessive noise levels?

Impact Analysis: The proposed project will not expose people residing or working in the project area to excessive noise levels.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Impact Analysis: The proposed project is not located within the vicinity of a private airstrip. The proposed project will not expose people residing or working in the project area to excessive noise levels.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

*References Used:*

1. Current Condition Report, Rho-Chem Facility, Geomatrix Consultants, Inc., (GMX) February 7, 2003 (Page 27-29)
2. Corrective Measures Study Report, Rho-Chem Facility, 425 Isis Avenue, Inglewood, California, Amec Foster Wheeler Environment & Infrastructure, Inc., 2018.

## 14. Population and Housing

Project Activities Likely to Create an Impact: No, the proposed project for operating and monitoring of the SVE system and installing, operating, and monitoring of the GWETS will not create an impact on the population and housing of the site.

Description of Baseline Environmental Conditions: The facility is located in the City of Inglewood in a metropolitan area of Los Angeles County. In 2015, the population in the city was estimated at approximately 115,966 people [City of Inglewood Urban Water Management Plan, August 2016]. The facility is located in an area designated for industrial use.

There is no construction, conversion or demolition of buildings, either homes or commercial/industrial, associated with the proposed project. The proposed project will not require any additional permanent workers at the facility. Therefore, this project will not affect existing housing, public services, infrastructure, or creates demands for additional housing. Because no additional permanent workers are required and the project does not displace any existing housing or workplaces, the proposed project will not alter the location, distribution, density, or growth rate of the human population of the area. There are no existing recreational opportunities at the facility and neither operation of the SVE system and construction/operation of the GWETS will impact the quality or quantity of existing recreational opportunities either at the facility or in the area. Since there is no additional permanent workforce, no additional infrastructure and no new homes associated with the proposed project, there will be no direct or indirect inducement for any population growth in area. There is no construction or demolition of buildings proposed as part of the project. Therefore, there will not be displacement of any existing housing or population and no necessity of construction of replacement housing elsewhere.

Analysis as to whether or not project activities would:

- a. Induce substantial population growth in area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Impact Analysis: The proposed project will not induce any population growth in the area, either directly or indirectly.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

Impact Analysis: The proposed project will not displace any existing housing, and will not necessitate construction of replacement housing elsewhere.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

Impact Analysis: The proposed project will not displace any people or necessitate construction of replacement housing elsewhere.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

*References Used:*

1. Current Condition Report, Rho-Chem Facility, Geomatrix Consultants, Inc., (GMX) February 7, 2003 (Page 27-29)
2. Corrective Measures Study Report, Rho-Chem Facility, 425 Isis Avenue, Inglewood, California, Amec Foster Wheeler Environment & Infrastructure, Inc., 2018
3. 2015 Urban Water Management Plan, City of Inglewood Public Works, August 2016.

## 15. Public Services

Project Activities Likely to Create an Impact: No, the proposed project for operating and monitoring of the SVE system and installation, operating and monitoring of the GWETS will not create an impact on public services for the facility or for the area.

Description of Baseline Environmental Conditions: Emergency Services are provided by the City of Inglewood Police Department and the Los Angeles County Fire Department. The nearest police station is the City of Inglewood Police Department Station, located approximately 2 miles northeast of the facility on Manchester Avenue. Response to a structural fire is provided by fire station number 171, whose emergency response time would be approximately four to five minutes. The nearest hospital is Centinela Hospital Medical Center which is located within approximately 5 miles from the facility. The hospital has an approximate cumulative capacity of 370 beds. The closest four-year college, University of West Los Angeles, is approximately 0.25 miles to the south of the facility. The Northrop Rice Aviation Institute of Technology is located on the same campus. Non-hazardous municipal waste generated in City of Inglewood is collected by three private haulers, Waste Management, B.F.I. and Crown Disposal.

The hazardous wastes generated from this project are VOC condensate from the C3 system, small amount of soil cuttings from well installation and purged groundwater from sampling events. The VOC condensate will be managed at the facility. Hazardous soil and groundwater will be managed by a certified off-site hazardous waste treatment or disposal vendor contracted directly by this project. Non-hazardous waste generated from this project includes soil cuttings from well installation and trenching activities, and spent carbon from the SVE and GWETS operation. All non-hazardous waste will be transported to off-site waste disposal facilities contracted directly by this project.

The proposed project is not expected to have any impact on the public services. Less than 10 workers will be associated with the proposed project during construction phase of the GWETS system. During routine groundwater monitoring events and operation of the SVE and GWETS system, on average one or two workers will be on-site at any point in time. Therefore, the probability for any significant impact on emergency services is minimal. The SVE and GWETS operations are not particularly risky from the perspective of fire. The project will not require provision of new government facilities or any physical alteration to existing ones. Since no such construction is necessary, the proposed project will not have any effect on acceptable service ratios, response times or other performance objectives for any public services.

Analysis as to whether or not project activities would:

- a. Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:

i. Fire protection?

Impact Analysis: This proposed project will not result in any adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection public services.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

ii. Police protection?

Impact Analysis: This proposed project will not result in any adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection public services.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

iii. Schools?

Impact Analysis: This proposed project will not result in any adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

iv. Parks?

Impact Analysis: This proposed project will not result in any adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

v. Other public facilities?

Impact Analysis: This proposed project will not result in any adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

*References Used:*

1. Current Condition Report, Rho-Chem Facility, Geomatrix Consultants, Inc., (GMX) February 7, 2003 (Page 27-29)
2. Corrective Measures Study Report, Rho-Chem Facility, 425 Isis Avenue, Inglewood, California, Amec Foster Wheeler Environment & Infrastructure, Inc., 2018

## 16. Recreation

Project Activities Likely to Create an Impact: No, the proposed project for operating and monitoring of the SVE system and construction, operating and monitoring of the GWETS will not create an impact on recreation in the vicinity of the facility.

Description of Baseline Environmental Conditions: The facility is located in the City of Inglewood in a metropolitan area of Los Angeles County. In 2015, the population in the city is estimated of approximately 115,966 people (City of Inglewood Urban Water Management Plan, dated August 2016). There are no recreational sites nearby the facility.

The facility is in an area designated for industrial use which has no recreational sites near the facility. The proposed project will not add either population or housing, will add only a few workers for limited times over any given quarter, and will therefore, not alter the location, distribution, density, or growth rate of the human population of the area. Because the proposed project neither adds homes or residents, it will not affect existing housing, public services, infrastructure, or create demands for construction or expansion of additional recreational facilities. Because the

proposed project is contained within the facility, it will not impact the quality or quantity of existing recreational opportunities.

Analysis as to whether or not project activities would:

- a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Impact Analysis: This proposed project will not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of those facilities would occur or be accelerated.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- b. Does the project include recreational facilities or require construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Impact Analysis: The proposed project will not include recreational facilities or require construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

*References Used:*

1. Current Condition Report, Rho-Chem Facility, Geomatrix Consultants, Inc., (GMX) February 7, 2003 (Page 27-29)
2. Corrective Measures Study Report, Rho-Chem Facility, 425 Isis Avenue, Inglewood, California, Amec Foster Wheeler Environment & Infrastructure, Inc., 2018
3. 2015 Urban Water Management Plan, City of Inglewood, August 2016.

## 17. Transportation and Traffic

Project Activities Likely to Create an Impact: None.

Description of Baseline Environmental Conditions: Regional access to the facility is provided by the eight-lane "I-405" San Diego Freeway and four-lane Manchester Avenue. Primary local access is from Manchester Avenue via Isis Avenue. Isis Avenue is a two-lane, north-south street, with traffic signal at the intersection with Manchester Avenue. Manchester Avenue is a four-lane main east-west thoroughfare, approximately 3/4 mile west of the San Diego Freeway, and serves industrial and commercial areas in the City of Inglewood. Aviation Avenue runs parallel to and one block to the west of Isis Avenue. It is a four-lane thoroughfare. Traffic flow is heavy on both Aviation and Manchester Avenues. A one day traffic car count was performed on March 19 2008 by the City of Los Angeles Department of Transportation at the intersection of Manchester Avenue and Florence Avenue. This is the nearest and most recent volume measurement near the Rho-chem facility. The hourly traffic flow volume from four directions at the intersection ranged from 541 vehicles to 1,382 vehicles, depending direction of approach and the time of the day . Data are not available for Isis Avenue, however, the Inglewood Department of Public Works estimates that the

average 24-hour daily traffic flow volume on Isis Avenue near Manchester Avenue is approximately 2,000 to 3,000 vehicles.

Construction of the GWETS would require 2-3 months of approximately 2 to 3 additional vehicles ingressing and egressing the facility each day. This is a fraction of a percent of even the traffic estimated for Isis Avenue. Maintenance and monitoring of the SVE system and GWETS and monitoring of the progress of the cleanup will require 1 to 2 vehicles ingressing and egressing the facility each week. Transporting GWETS consumables and generated waste is anticipated to require 1 to 2 vehicles ingressing and egressing the facility over each month. This is even less of an impact than the construction phase and will not result in a significant increase in compared to the existing traffic flow and pattern. Therefore, there will not be any significant impact to the environment. The proposed project will not exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highway. No changes to site paving- or adjoining- roads is proposed. Therefore, the project will not substantially increase hazards due to a design. The equipment necessary to the proposed project will not be incompatible with approved uses of the existing roadways. The construction and maintenance activities necessary for the proposed project will not result in inadequate emergency access since these activities must comply with the site safety plan. The estimated 2 to 3 vehicles each day for several months during construction of the GWETS and 1 to 2 vehicles thereafter each week will not result in inadequate parking capacity, or conflict with adopted policies, plans, or programs supporting alternative transportation. The additional vehicles will be handled on-site.

Analysis as to whether or not project activities would:

- a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Impact Analysis: This proposed project will not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Impact Analysis: This proposed project will not conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact

No Impact

- c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Impact Analysis: This proposed project will not change the air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Impact Analysis: This proposed project will not substantially increase hazards due to a design feature.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- e. Result in inadequate emergency access?

Impact Analysis: This proposed project will not result in inadequate emergency access.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Impact Analysis: This proposed project will not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

*References Used:*

1. Current Condition Report, Rho-Chem Facility, Geomatrix Consultants, Inc., (GMX) February 7, 2003 (Page 27-29)

2. Corrective Measures Study Report, Rho-Chem Facility, 425 Isis Avenue, Inglewood, California, Amec Foster Wheeler Environment & Infrastructure, Inc., 2018

## 18. Tribal Cultural Resources

This proposed project will not cause an adverse change on a significance of a historical resources or archeological resource as defined in 15064.5.

Project Activities Likely to Create an Impact: Drilling of wells and trenching for the installation of underground piping of approximately 2,880 lineal footage (approximately 8,640 square feet).

Description of Baseline Environmental Conditions: The facility has been previously graded and covered in asphalt and concrete. No additional grading is necessary for this project. The proposed project will affect approximately 10,000 square feet of the facility and off-site near the facility, which is already covered by concrete and asphalt. It is located in a primarily industrial area. No known unique ethnic cultural values or cultural resources have been observed by the DTSC project manager or have otherwise been reported at the facility. There are no bedrock exposures on-site or in the vicinity of the site and the fluvial nature of the underlying geological materials obviate the likelihood of any paleontological resources.

The site lies within the ancestral lands of the Gabrielino/Tongva which stretch from Topanga Canyon in Los Angeles County through Aliso Creek in Orange County. The facility does not lie on or near any reported sites of sacred importance to the Gabrielinos. Importantly, the location has extensive previous disturbance due to some 30 or more USTs being removed.

Analysis as to whether or not project activities would: DTSC's Office of Environmental Justice and Tribal Affairs has been notified of this project and will contact all concerned tribal members historically associated with the Inglewood area to determine if their concerns are being addressed and if any mitigation measures should be employed.

- a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
  - i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

Impact Analysis: DTSC's Environmental Justice and Tribal Affairs (EJ/TA) Office submitted a request to the Native American Heritage Commission (NAHC) regarding their records. NAHC conducted a search of the Sacred Lands File with negative results for the area of the Rho Chem, LLC. (Site); however, they provided a list of five Tribes that might have additional information. On December 12, 2018, the EJ/TA Office mailed letters to the five Tribal contacts listed and included two maps (as enclosures) that identified the location of the Site. DTSC received no request(s) for consultation regarding this project and considers the Tribal engagement process complete.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resource Code Section 5024.1. In applying

the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Impact Analysis: As indicated above in the analysis for 17 a.i., no resources were identified that meet the referenced Public Resource Code Section.

Ground disturbance during construction of the GWETS will involve trenching for the installation of underground piping and drilling of wells, which is expected to have little potential for inadvertent discovery since borings and trenching area would be made through the existing concrete cover. Although no Tribal Cultural Resources are anticipated, In the event of accidental discovery of potential cultural or archaeological resources, immediately suspend excavation activities in the immediate area and surrounding 50 feet and contact Mr. Matthew Teutimez with the Gabrieleno Band of Mission Indians – Kizh Nation at 844-390-0787. DTSC staff and property owner are also to be immediately notified and informed. After discussion with their Tribal Chairperson or respective Cultural Resources Managers or Tribal Historic Preservation Officers and in collaboration with DTSC (including the Office of Environmental Justice and Tribal Affairs) and the property owner, implement any measures deemed necessary to record and/or protect the cultural or archaeological resource(s).

Conclusion:

- Potentially Significant Impact
- Less Than Significant With Mitigation Incorporated
- Less Than Significant Impact
- No Impact

*References Used:* NAHC Response  
DTSC's Letters to Tribes

## 19. Utilities and Service Systems

Project Activities Likely to Create an Impact: No, the proposed project for operating and monitoring of the SVE system and installing, operating, and monitoring of the GWETS will not create an impact on the utilities and services systems.

Description of Baseline Environmental Conditions: Electricity is provided by Southern California Edison. Natural gas is provided by The Southern California Gas Company. Water needs are met by the City of Los Angeles Department of Water and Power. Sewage is disposed through Los Angeles County Sanitation Districts and is generally treated at the Hyperion Water Reclamation Plant.

No new or expanded utility systems or significant alteration to the existing service systems will be needed for this proposed project. Continued operation of the SVE system and construction and operation of the GWETS will require use of electricity and a new sewer line or storm water discharge line for the potential discharge of treated groundwater. Electrical requirements are not anticipated to be significant when compared to current usage. Most of the treated groundwater is expected to be re-injected back to the groundwater aquifer. In cases when some of the injection wells need to be taken off line for maintenance or repair, the amount of treated groundwater discharge into the existing POTW sewer line or storm drains is expected to be no more than 6 gallons per minute. This project will not require or result in the construction of new wastewater treatment facilities, new storm water drainage facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects. This project will not result in determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the projects projected demand in addition to the providers existing commitments. The

proposed project's solid waste disposal needs will be minimal and will be served by a landfill with sufficient permitted capacity. This project will comply with federal, state, and local statutes and regulations related to solid waste.

Analysis as to whether or not project activities would:

- a. Exceed wastewater treatment requirements of the applicable [Regional Water Quality Control Board](#)?

Impact Analysis: the proposed project will not exceed wastewater treatment requirements of LARWQCB. A WDR permit will be obtained from the Los Angeles Regional Water Quality Control Board prior to reinjection of treated groundwater. The proposed remedial reagents to be injected into the water table groundwater zone are authorized injection material amendments listed in Appendix A of the General WDR Order No. R4-2014-0187. The GWETS will be operated and regular groundwater monitoring will be performed in accordance with the WDR permit during injection and re-circulation.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Impact Analysis: This proposed project will not require or result in the construction of new public water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Extracted groundwater would be pumped to an on-site aboveground treatment system which utilizes bag and/or cartridge filters for particulate filtration followed by AGAC for VOC abatement. Treated groundwater would be discharged either to a POTW sewer under a POTW permit, discharged to a storm drain under a NPDES permit, or re-injected under a WDR permit program. It is estimated that treated groundwater would be discharged to the POTW sewer or storm drain at no greater than 6 gpm, which the exiting sewer system or storm water infrastructure site is expected to be able to accommodate.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Impact Analysis: This proposed project will not require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Impact Analysis: This proposed project will have sufficient water supplies available to serve the project from existing entitlements and resources. No new or expanded entitlements are needed.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Impact Analysis: This proposed project is not anticipated to result in determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Impact Analysis: This proposed project will be served by a landfill with sufficient permitted capacity to accommodate the projects solid waste disposal needs.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- g. Comply with [federal](#), [state](#), and local statutes and regulations related to solid waste?

Impact Analysis: This proposed project will comply with federal, state, and local statutes and regulations related to solid waste.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

*References Used:*

1. Current Condition Report, Rho-Chem Facility, Geomatrix Consultants, Inc., (GMX) February 7, 2003 (Page 27-29)
2. Corrective Measures Study Report, Rho-Chem Facility, 425 Isis Avenue, Inglewood, California, Amec Foster Wheeler Environment & Infrastructure, Inc., 2018

## 20. Wildfire

Project Activities Likely to Create an Impact:

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project: The project is not in or near a state responsibility area or lands classified as very high fire hazard severity zones; consequently, no additional analysis is required.

Analysis as to whether or not project activities would:

- a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

Impact Analysis:

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Impact Analysis:

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Impact Analysis:

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

### **Mandatory Findings of Significance**

Based on evidence provided in this Initial Study, DTSC makes the following findings:

- a. The project  has  does not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.
- b. The project  has  does not have impacts that are individually limited but cumulatively considerable. (“Cumulatively considerable” means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)
- c. The project  has  does not have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly.

### **Determination of Appropriate Environmental Document**

On the basis of this initial evaluation:

I find the proposed project COULD NOT HAVE a significant effect on the environment. A **Negative Declaration** will be prepared.

I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **Mitigated Negative Declaration** will be prepared.

I find the proposed project MAY HAVE a significant effect on the environment. An **Environmental Impact Report** is required.

I find the proposed project MAY HAVE a “Potentially Significant Impact” or “Less Than Significant With Mitigation Incorporated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **Environmental Impact Report** is required, but it must analyze only the effects that remain to be addressed.

I find the proposed project COULD HAVE a significant effect on the environment. All potentially significant effects (a) have been analyzed adequately in an earlier Environmental Impact Report or Negative Declaration pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier Environmental Impact Report or Negative Declaration, including revisions or mitigation measures that are imposed upon the proposed project. **Therefore, nothing further is required.**

### **Certification:**

I hereby certify that the statements furnished above and in the attached exhibits, present the data and information required for this initial study evaluation to the best of my ability and that the facts, statements and information presented are true and correct to the best of my knowledge and belief.



Preparer's Signature

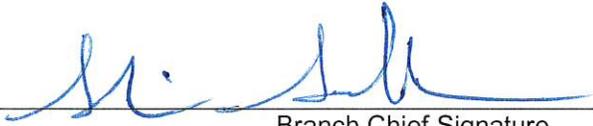
10/3/2019

Date

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