

INITIAL STUDY

PROJECT TITLE: Ecology Control Industries		CALSTARS CODING:
PROJECT ADDRESS: 13738 Slover Avenue	CITY: Fontana	COUNTY: San Bernardino
PROJECT SPONSOR: Ecology Control Industries	CONTACT: Jerry White 19500 Normandie Avenue, Torrance, Ca 90502	PHONE: 310-767-3240

APPROVAL ACTION UNDER CONSIDERATION BY DTSC:

- Initial Permit Issuance Permit Renewal Permit Modification Closure Plan
 Removal Action Workplan Remedial Action Plan Interim Removal Regulations
 Other (specify):

STATUTORY AUTHORITY:

- California H&SC, Chap. 6.5 California H&SC, Chap. 6.8 Other (specify):

DTSC PROGRAM/ ADDRESS: Standardized Permitting and Corrective Action Branch	CONTACT: Ryan Batty	PHONE: 916-255-6699
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PROJECT DESCRIPTION:

The Department of Toxic Substances Control (DTSC) is considering approval of a Closure Plan (CP) of the Storage Tank Recycler with Environmental Protection Agency (EPA) identification (ID) Number CAD 982484933 for Ecology Control Industries, hereafter ECI Fontana. The CP includes procedures to be used to decontaminate and close the ECI Fontana facility. This CP was prepared and submitted following guidelines contained in California Code of Regulations, title 22, Section 66264.112. This Initial Study examines the potential impacts associated with closure verification activities. The CP and Soil Sampling Plan to Evaluate Site Conditions for Closure are incorporated by reference.

Location: The 1.4-acre site is located at 13738 Slover Avenue, in an incorporated area of the City of Fontana in the County of San Bernardino, California. The site is located in a mixed industrial and commercial area. The property fronts Slover Avenue to the south and is surrounded by Mulberry Street to the West, Calabash Avenue to the east, and Southern Pacific Railroad and Interstate 10 to the north. The project site occupies a 1.24-acre portion of lot 1033, which includes portions of Parcel # 0236-011-08-P001 and Parcel #236-01-1009-P001. The geographical coordinates for the facility are: latitude 34.063211 degrees and longitude 117.506009 degrees. Refer to the attached maps at the end of this document, "USGS Topographic Map," "ECI Facility Plot Plan," and "Area Traffic Map/Area Map."

Site History:

Superior Trailer, a trailer manufacturing company, which is located on the west border of the site, leases the site property to Ecology Control Industries. The ECI Fontana property was previously leased by Erickson Tank Services (Erickson) from Superior Trailer. Property development included the construction and operation of the tank processing area in the northern portion of the site. Erickson operated the facility as an environmental services and maintenance yard from 1988 through 1998 when the business was sold to ECI Fontana. ECI then assumed the property lease. ECI Fontana operations at the facility have been similar to those conducted by Erickson.

The Facility recycled drained storage tanks previously used to store fuel. Tanks and containers that were designated as Non- Resource Conservation and Recovery Act (RCRA) hazardous waste were shipped on a Uniform Hazardous Waste Manifest. The facility accepted empty tanks, and tank appurtenances as Non-RCRA-Hazardous Waste Solid (empty storage tanks). Wastes that were designated as RCRA hazardous wastes were not accepted at the facility. In order to confirm that all information is correct, a "Tank Receiving/Discrepancy Form" was completed before the tank was accepted at the facility. When waste conformance was confirmed, the

tank, piping, hoists, and related equipment, were assigned a tank receiving number by the Facility. Empty petroleum fuel tanks, hydraulic hoists and piping were profiled on a "Tank Certification" and "Tank Processing Facility Land Disposal Restriction Form". The Lower explosive level (LEL) readings were taken prior to tank shipment. Samples were taken from the wastes that were removed from the tanks.

Project Activities:

If approved, the CP would authorize ECI Fontana to conduct the following activities. The activities will be split due to timing constraints and thus have been characterized as distinct phases. Phase One activities will occur. Phase Two activities may occur subject to the findings of soil testing conducted in Phase One.

Phase One:

- ❖ All structures and equipment will be decontaminated by pressure washing as described in Section D of the Closure Plan. Rinsate water will be collected and transported to an approved recycling facility.
- ❖ To demonstrate the ability of the facility to meet clean-up standards, confirmation samples (chip, wipe and cleaning solution) will be obtained from equipment and structures. Concrete core samples will be collected in select locations during soil sampling activities. Concrete cores will be collated with soil samples. Shallow soil samples will be collected beneath the asphalt to determine if contaminants were released in the area and have penetrated through the asphalt. Samples will be collected at depths of six (6) inches and two (2) feet at the following locations: above ground storage tank areas, former tank unloading area, on and around the tank rinse pad, and areas suitable for background samples. Thirty-four (34) soil samples will be collected and ten (10) background samples will be collected. The samples will be tested for petroleum hydrocarbons and metals. The closure clean-up standard will be to background levels.
- ❖ Surface and subsurface soil confirmation samples will be collected and analyzed according to the sampling protocol provided in Section H and I of the Closure Plan, as well as the Soil Sampling Plan prepared for the facility in March 2006.

Phase Two:

- ❖ If the testing conducted in phase one indicates there is no contamination, then no further action will be taken. If contamination is found, the CP allows for the excavation and removal of up to 50 cubic yards of material at a depth of up to two feet.
- ❖ The figure of 50 cubic yards and depth of two feet is based on an estimate provided by ECI concerning contamination that may potentially exist. This allowance includes the presumption that any contamination found is incidental and discrete and is not part of a larger area of contamination comprising the majority of the site. If major contamination above this volume or depth is found a revised closure plan and new CEQA evaluation may be required.
- ❖ Prior to conducting any excavation of contaminated soil, ECI will submit to DTSC an excavation proposal along with their sampling report (to be prepared after Phase One is complete). This proposal will confirm details such as the excavation limits, the details of the facility receiving the contaminated material and the proposed backfill.

The following structures, buildings, and equipment will be decontaminated:

1. Rinsate tank
2. Secondary containment system for rinsate tank
3. Pipes, pumps, valves, hoses
4. Asphalt holding pad, concrete processing pad

Decontamination Procedures include the following:

1. Rinsate tank: tank entry will follow standard confined space entry Procedures as described below:
 - a. Pumps and piping must be drained and blinded prior to tank entry.
 - b. Prior to tank entry, vapor space will be tested and monitored utilizing a 4 gas confined space meter to assure the atmosphere is safe for entry and continued occupation.
 - c. The tank entry/decontamination team will consist of a minimum of three people. The job requires a "confined space supervisor" to complete the ECI confined space entry permit. A minimum of one "hole watch", and one entrant are required whenever it is necessary to enter into a tank. Entrants remove contaminated soils and sludge with a shovel or scraping tool. The tank will then be pumped to the rinsate holding tank with an air driven diaphragm pump.
 - d. Upon completion of the cleaning, the tank will be visually inspected for residues.

2. Facility Equipment: Facility equipment such as: pumps, hoses, shovels and piping associated with the rinsate tank, will be triple rinsed on the processing pad. The rinsate water will be collected with a vacuum truck for off-site recycling.
3. Tank Holding Pad and & Tank Processing Pad: Both pads will be triple rinsed using a pressure washer or if necessary a steam cleaner. A “simple green” cleaning solution will be utilized on heavily stained areas. The rinsate water will be collected using the above mentioned vacuum truck and transported off-site for recycling.

The estimated maximum waste inventory for the ECI Fontana facility CP is as follows:

- Rinsate Tanks: 5,200 gallon tank rinsate water and 1,850 gallon tank rinsate water.
- There are no underground fuel storage tanks (UST’s) on the site.
- There is no hazardous waste stored in drums or roll-off bins on the site.

It is estimated that the following wastes will be generated from closure activities:

- High-Pressure Washing: 10 gallons of wash water generated per 1 drum cleaned; 50 gallons of wash water generated for 1 pump & lines cleaned; 4 gallons of wash water generated per square foot of surface cleaned.
- Steam Cleaning: 4 gallons of wash water generated per square foot of surface cleaned.
- Sand Blasting: 0.62 gallons of sand per square foot of surface cleaned.
- Decontamination of tanks and tank area:
 - Tank Decontamination Water: 2463 gallons rinsate water from large poly tanks and 954 gallons rinsate from small poly tank; 1.50 cubic yards of solid from tank bottom, and 100 gallons from pumps and associated lines.
 - Structure and Equipment Decontamination Water: 14,420 gallons (3,605 square feet x 4 gallons/foot) from cleaning Tank Holding Pad; 3,200 gallons (800 square feet x 4 gallon/foot) from cleaning Tank Cleaning Pad; 4,860 gallons (1,215 square feet x 4 gallon/foot) from cleaning secondary containment area; 200 gallons from equipment.

Approximately 26,197 gallons of rinse water will be generated. The rinse water will be transported off-site for recycling.

The project is expected to commence in March 2007 and is expected to take no longer than the statutory 180 days to complete the closure plan activities.

References:
1,2,3

ENVIRONMENTAL IMPACT ANALYSIS:

1. Aesthetics

Description of Baseline Environmental Conditions:

ECI is located in industrially zoned vicinity and had operated from 1988 to 1998 as Erickson Inc. A chain link fence surrounds the entire 1.5-acre facility. A single-story office building is located in the southern portion of the property, and a parking area is adjacent to this building. The tank pad is located in the northern portion of the property. There is outdoor security lighting at night, and this is an existing light source.

Analysis as to whether or not project activities would:

The facility closure activities will be conducted from 7:00 A.M. to 6:00 P.M. Closure activities will not be conducted at night. The facility is not located within a scenic vista. The facility is expected to be clean closed and all buildings and structures will remain. If indicated by sampling results, up to 50 cubic yards of contaminated concrete and soil may be removed from the site. In the event more than 50 cubic yards of contaminated materials must be removed, a separate revised closure plan will be prepared. This revised closure plan would undergo a new CEQA review.

Refer to the above analysis for the responses to items a. through d.

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

Impact Analysis:

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 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:

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis:

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis:

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

1, 2,3

2. Agricultural Resources

Description of Baseline Environmental Conditions:

The area is currently zoned as industrial and has been since at least 1987.

Analysis as to whether or not project activities would:

The Closure (CP) would not change the zoning for the project location.

- 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:

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- b. Conflict with existing zoning or agriculture use, or Williamson Act contract.

Impact Analysis:

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- c. 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:

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

3

3. Air Quality

Description of Baseline Environmental Conditions:

The City of Fontana is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD) located within the South Coast Air Basin (SCAB) that consists of 6,480 square miles and includes Orange County, non-desert areas of Los Angeles, Riverside, and San Bernardino Counties. Air quality is a function of both the rate and location of pollutant emissions under the influence of meteorological conditions and topographical features. Air masses can move from basin to basin. As a result, pollutants, such as ozone and particulate matter can be transported across air basin boundaries. The prevailing daytime sea breeze tends to transport pollutants from coastal areas into the SCAB's inland valleys and further inland into neighboring areas. Concentrations of primary pollutants (those emitted directly into the air) are typically highest close to the sources that emit them. However, secondary pollutants (those formed in the air by chemical reaction of precursors) reach maximum concentrations some distance downwind of the sources that emit the precursors due to the polluted air mass moving inland many miles by the prevailing winds before maximum concentrations are reached. The SCAB's air quality varies with the seasons due to seasonal differences in the weather. All ozone exceedances occurred during the May to October "smog season." Particulate matter up to 10 microns or less in diameter (PM₁₀) and particulate matter up to 2.5 microns or less in diameter (PM_{2.5}) standards are exceeded at times throughout the year and do not have a clear pattern like ozone and carbon monoxide. PM_{2.5} exceedances, however, typically occur more frequently during late fall and early winter months. The standards were exceeded on 54 days in 2001 (37 days excluding PM_{2.5}). Attainment status for Ambient Air Quality Standards for the SCAB is listed in the table below.

2004 Area Designations for Ambient Air Quality Standards.

Criteria Pollutant	State Status	National Status
PM _{2.5}	nonattainment	nonattainment
PM ₁₀	nonattainment	nonattainment
Ozone	nonattainment	nonattainment
Carbon monoxide (CO)	nonattainment	nonattainment
Nitrogen dioxide (NO _x)	attainment	unclassified/attainment
Sulfur dioxide	attainment	attainment
Sulfates	attainment	no data
Lead	attainment	no data
Hydrogen sulfide	attainment	no data
Visibility reducing particles	unclassified	no data

The above data was extracted from the California Air Resources Board web site:
<http://www.arb.ca.gov/desig/adm/adm.htm>.

Analysis as to whether or not project activities would:

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

Impact Analysis:

As noted, the subject project is within the jurisdiction of SCAQMD. The District is primarily responsible for assuring that National and State ambient air quality standards are attained and maintained in the South Coast Air Basin. Regulation XI rules are air pollution control rules that apply to a wide range of existing stationary sources and generally regulate a single pollutant. Each Regulation XI rule applies to controlling emissions from a specific source category or type of equipment.

As previously indicated the closure operations have been characterized into two distinct phases, Phase One and Phase Two. The air quality analysis will also examine the impacts of the phases separately because the phases are distinctly different and their implementation will be separated in time (Phase Two is likely to follow Phase One by a month or more).

Phase One:

The activities conducted in Phase One are outlined below and will be completed within one week.

- Rinsing of the tank holding and process pads
- Rinsing of structures
- Decontamination of tanks, pumps, piping and valves
- Removal of tanks, pumps, piping and valves
- Sampling of soil and sub-soil as per soil sampling plan

The following vehicles will be used during phase-one closure activities.

Ten employee vehicles

One vacuum truck – removal of wash/rinse water generated in the decontamination process

Two medium flat bed trucks – removal of material and equipment

One truck (pick-up) mounted sampling rig – direct drive type

Analysis of the equipment and personnel required to complete Phase One tasks indicates that the threshold impact values outlined in Chapter Nine of the CEQA Air Quality Handbook (SCAQMD, 1993) will not be attained. Therefore, Phase One activities will not have a significant impact on air quality.

Phase Two:

Phase Two allows for the excavation and removal of up to 50 cubic yards of contaminated soil and associated concrete/pavement. The initial cursory analysis by DTSC indicated these activities warranted further examination.

The screening tables in Chapter Nine of the CEQA Air Quality Handbook were used in the analysis. The emissions calculated were compared to the threshold of significance values located in Chapter Six of this same document.

The excavation of contaminated soil was modeled on the construction of an industrial land use. This is reasonable because excavation down to a depth of two feet is a similar process to the preparation of a building foundation. The analysis considered the pollutants of primary concern namely; reactive organic compounds (ROC), Nitrous Oxides (NOx), Carbon Monoxide (CO), and particulate matter less than 10 microns in diameter (PM10). The emissions calculated using the screening tables were below threshold levels for all pollutants other than NOx. Further analysis showed that the screening tables overestimated NOx emissions for this project and actual emission will be well below threshold levels.

The tanks processed at the ECI facility were diesel and gasoline storage tanks. It is, therefore, likely that any soil contamination, if present, will be hydrocarbons. The testing that will be conducted in Phase One will include testing for volatile organic compounds (VOC). If VOC is present in significant quantities, then the provisions of Regulation XI Rule 1166 'Volatile Organic Compound Emissions from Decontamination of Soil' will be followed. This would include preparation and certification of a mitigation plan.

In addition, regardless of whether VOC contamination is found, the provisions of Regulation XI Rule 403 'Fugitive Dust' will be followed (where applicable). Specifically, ECI will take note of the recommendations outlined in Table 1, 'Best Available Control Measures'. (Note: this project would not fall into the category of a large project as defined by this rule).

The Closure Plan also has details of the project controls that will be utilized such as water misting and the use of tarpaulins to cover the trucks during transportation.

One front end loader and one dump truck over two weeks (one week to excavate and one week to put fill back) are expected to be used for Phase Two activities if they occur. Emissions from this equipment will not result in a significant impact.

The types of vehicles used for Phase I and Phase II closure activities are similar to those used during the active daily facility operations.

Based on all of the above analysis, impacts on air quality of this project will be less than significant. The calculations and additional assumptions supporting this conclusion are located in Attachment E at the end of this document.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 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:

As noted in Subsection (a) above, the project activities are under the regulatory authority of the SCAQMD and that compliance with their standards related to ozone, PM 10, and PM 2.5 will not result in a significant impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 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:

Air quality standards for PM 10 (the main pollutant of concern with this project) in the region will not be attained. However, the calculations in Attachment E, that are summarized in (a) above, show that the impact will be very limited and not meet the significance thresholds set by the SCAQMD. In addition, the project controls included in the project will significantly limit dust emissions from the site and are expected to result in a less than significant impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- d. Expose sensitive receptors to substantial pollutant concentrations.

Impact Analysis:

The proposed project site is located in an industrial area. There are no sensitive receptors within a quarter mile of the project site.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis:

No objectionable odors are anticipated from the closure activities.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- f. Result in human exposure to Naturally Occurring Asbestos (see also Geology and Soils, f.).

Impact Analysis:

The project site is not located in an area that is known to have naturally occurring asbestos.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

1, 2, 12, 13, 19

4. Biological Resources

Description of Baseline Environmental Conditions:

ECl is located in an industrial zone. The facility has operated consistently as a tank processing base for approximately the past 15 years. The 1.24-acre leased property is partially paved and developed and is completely surrounded by a chain link fence. Unpaved areas contain sparse vegetation with weedy characteristics. The site is flat and does not contain any vegetation cover suitable for foraging or habitat. The site has undergone continuous disturbance due to ongoing facility operation. The site is located 0.2 miles south of the Interstate 10 Freeway between Calabash Ave. and Etiwanda Ave. The site is located in an industrial commercial zone. ECl is surrounded by a trailer manufacturing facility on the west, a pallet supply company on the east and a trucking yard across the street from Slover Ave. No residences have been identified within ¼ mile of the facility.

A September 20, 2006, Rarefind report for the Fontana quadrant was reviewed. Species that may be found near or in the general project vicinity include the following:

Burrowing owl (*Athene cunicularia*) – State species of Concern: This bird inhabits open, dry annual or perennial grasslands, deserts and scrublands characterized by low-growing vegetation. It is a subterranean nester that is dependent upon the burrows of other mammals, most notably, the California ground squirrel. Two adults were observed at a burrow site south of I-10, between South Fontana and Crestmore. The burrows were located in the bands of a wash in 1998 and again in 2002 in a vineyard.

Coast (San Diego) horned lizard (*Phrynosoma coronatum* [blainvillei]) - State species of Concern: This species inhabits coastal sage scrub and chaparral in arid a semi-arid climates. It prefers friable rock, or shallow, sandy soils. It was sighted south of I-10 in an area bordered by Sierra Avenue, Tamarind Avenue, Jurupa Avenue, and Slover Avenue, south of Fontana in 1998. In this location, it was sighted in a vineyard remnant, dominated by mustard and avena in loose delhi-series soils on flat topography surrounded by fallow agriculture. It is threatened by development and weed control. Two adults and four juveniles were observed at that time.

Coastal California gnatcatcher (*Poliophtila californica californica*) - State species of Concern: This bird resides in coastal sage scrub below 2500 feet elevations in Southern California in arid washes, on mesas and slopes. Not all areas classified as coastal sage scrub are occupied. Birds have been observed in the Jurupa mountain areas near Poplar Avenue, Willow Drive, and south of Savona Street. Approximately seven bird sightings occurred during 1994 and two in 1998.

Delhi Sands flower-loving fly (*Rhaphiomidas terminatus abdominalis*) – Federal Endangered: This species is found only in areas of the delhi sands formation in southwestern San Bernardino and northwestern Riverside Counties. It requires fine, sandy soils, often with wholly or partly consolidated dunes and sparse vegetation. A sighting occurred southeast of the intersection of Mango and Slover Avenues about two miles southwest of Bloomington in 2002. One adult male was observed.

Northwestern San Diego pocket mouse (*Chaetodipus fallax fallax*) – State Species of Concern: This mammal inhabits coastal scrub, chaparral, grasslands, and sagebrush. One animal was detected in 1999 in a site bordered by Sierra Avenue, Tamarino Avenue, Slover Avenue and Jurupa Avenue.

Analysis of Potential Impacts:

The barren, disturbed nature of the project site is not conducive to wildlife habitat. The immediate area around the facility has been developed for commercial use. This discourages wildlife from venturing further into the developed area. The site closure will include steps to clean close and decontaminate any impacted areas (such as concrete surfaces, tanks and bins). As discussed in project description, the site closure process would not have any adverse effect, either directly or through habitat modification, on any migratory or other species.

As previously stated, the site is located in an industrial area. Much of the site is disturbed due to continuous facility operations and does not contain any habitat. The project site does not possess creeks, marsh areas, sloughs, or other wetland, woodland, or grassland features, and the endangered species and special status species listed in the Rarefind report do not inhabit the project site area. As previously stated, the barren, disturbed nature of the project site is not conducive to wildlife habitation. The facility is expected to conduct closure in a manner that ensures that hazardous waste is not released on-site or off-site. Controls include complete capture of rinsate, sampling, and disposal at an approved off-site Hazardous waste facility. The nearest storm drain is located at the intersection of Slover Ave. and Mulberry Street. There are no drains, swales, curbs, culverts, or other rainwater controls located in the facility. The tank processing areas, including the holding pad, processing pad, and rinsate holding tanks are equipped with secondary containment that will capture rinsate during pad decontamination. All decontamination rinsate water will be pumped into holding tanks and managed until proper disposal.

According to an October 19, 2006, telephone conversation with Mr. Chema Ude, Senior Associate Planner for San Bernardino County, there are no environmental concerns for the property.

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:

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 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, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

Impact Analysis:

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 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:

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 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:

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 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:

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 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:

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

1,3,8,16,7

5. Cultural Resources

Description of Baseline Environmental Conditions:

The site is located in an industrial area. Much of the area is disturbed due to continuous facility operations and is not known to contain cultural resources.

The Native American Heritage Commission (NAHC) performed a Sacred lands Search at DTSC's request and did not locate resources at the site. However, the NAHC did provide a list of Native American tribal contacts who may have an interest in the project. Letter will be sent to these contacts inviting them to participate in the comment period for this project. In the event resources are located during closure sampling activities, the provisions of Public Resources Code section 15064.5 and Health and Safety Code section 7050.6 will be complied with by the facility.

The Office of Historic Preservation, California Historical Landmarks for San Bernardino County, web site was reviewed on October 19, 2006. No records near the project site location were listed.

According to an October 19, 2006, telephone conversation with Mr. Chema Ude, Senior Associate Planner for San Bernardino County, there is no record of paleontological or cultural resources for the property.

Analysis as to whether or not project activities would:

The closure plan does not authorize any activities that will disrupt cultural resources. Site closure activities include taking soil samples at depth of six (6) inches to two (2) feet. If the sampling proves there is contamination on the site then the CP permits the removal of up to 50 cubic yards of soil at a depth of up to two feet.

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

Impact Analysis:

The project site is disturbed. No historical resources are known to exist at the project site.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis:

No archeological resources are known to exist at the site.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis:

No paleontological resources are known to exist at the site. No unique geologic feature is present at the site.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- d. Disturb any human remains, including those interred outside of formal cemeteries.

Impact Analysis:

No human remains, including those interred outside of formal cemeteries are known to exist at the site.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

1,3,14,15,17,18

6. Geology and Soils

Description of Baseline Environmental Conditions:

The ECI facility is topographically situated on a plain. ECI Fontana has ceased accepting and recycling activities.

Analysis as to whether or not project activities would:

Closure activities will include soils sampling from six (6) inches up to two (2) feet. Forty-four (44) samples will be collected. A pickup truck-mounted, direct-push sampling rig equipped with a two (2) foot long, 2-inch diameter core barrel sampler will be used to obtain a continuous core of the soil to the desired depth at each sample location. Soil samples will

be retained for laboratory analysis. Samples will be handled using appropriate United States Environmental Protection Agency (EPA Method No. 5036) methods. A concrete saw will be used to extract concrete samples. Samples will be delivered to the lab using appropriate chain-of-custody procedures. After sample collection, each borehole will be abandoned by placing the cutting into its respective borehole. The remainder of each borehole will be filled with Portland cement to bring the level to grade.

If the sampling proves there is contamination on the project site, then the CP permits the removal of up to 50 cubic yards of soil and associated concrete at a depth of up to two feet. Contaminated soil and associated concrete would be transported off site for treatment at an approved facility. The material removed will be replaced with certified backfill and compacted to local standards. The backfill material will be of equal or better quality to the material analyzed in the background sampling. If more than 50 cubic yards of materials must be removed, a revised closure plan and a new CEQA evaluation will be conducted.

The project would not destroy, cover, or modify any unusual or unique geologic or physical features. Closure activities will include facility structures and pad washing and soil sampling as discussed above. If contamination is found it is likely to be in small localized 'pockets' and near the soil surface. The closure activities are temporary and limited in scope and will not create geological hazards.

- a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
- 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).
 - Strong seismic ground shaking.
 - Seismic-related ground failure, including liquefaction.
 - Landslides.

Impact Analysis:

Refer to the statements above for items a through d.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis:

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 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:

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 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:

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis:

No septic tanks or waste water disposal systems is being proposed for the site closure.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- f. Be located in an area containing naturally occurring asbestos (see also Air Quality, f.).

Impact Analysis:

The site is not located in an area that is known to have naturally occurring asbestos.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

1,2,3,20

7. Hazards and Hazardous Materials

Description of Baseline Environmental Conditions:

ECI Fontana has ceased operation and no longer accepts or recycles UST's.

Analysis as to whether or not project activities would:

The closure plan will remove all remaining equipment and include soil sampling to determine if any hazardous waste releases have occurred during past facility activities.

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

Impact Analysis:

All hazardous waste has been removed from the property. Rinse water will be captured and transported off site to an appropriate disposal facility. Also refer to the Geology and Soils section above for soils sampling activities. Soils testing for metals and petroleum hydrocarbons will be performed. The closure cleanup standard will be to background levels. No groundwater sampling is proposed at this time. Soil quality data collected during this initial investigation will be reviewed, and a Sampling Report will be prepared.

If the soil is found to be contaminated ECI will submit with their Sampling Report an Excavation Proposal (EP). This proposal will characterize how the excavation and removal will be conducted and will be subject to approval by DTSC staff. The requirements of the EP are outlined in the CP.

Prior to commencing work at the site, the contractor will be required to prepare a Health and Safety Plan in accordance with applicable laws to ensure the safety of the contractor and any subcontractors on-site during the duration of the project, and to protect the health and safety of the public.

The Health and Safety Plan will address all of the following issues:

- Potential chemical and physical hazards at the site
- Personal protective equipment for contractors and employees
- Site controls, such as site security and sanitation
- Decontamination procedures
- Emergency response procedures
- Training, medical surveillance and recordkeeping

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 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:

In the event soil and associated concrete is found, the transportation of contaminated materials from the site will require a Hazardous Waste Manifest. Waste will be shipped by an appropriately licensed transporter and will be delivered to an appropriately licensed facility in compliance with state and federal laws. In the event more than 50 cubic yards of soil and associated concrete must be removed, a revised closure plan and a new CEQA evaluation will occur.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of and existing or proposed school.

Impact Analysis:

There are no schools within one quarter mile of the project site. Kaiser High School is located 1.0 mile to the South East of the project site and Chaparral Elementary School is located 1.3 miles to the South of the project site.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 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 public or the environment.

Impact Analysis:

The facility is not a listed site.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis:

Closure activities will not interfere with emergency plans.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

1,3

8. Hydrology and Water Quality

Description of Baseline Environmental Conditions:

There are no injection or withdrawal wells located on the project site. There are no known wells within the 2,000-foot radius of the project site. The nearest wells to the facility are described below:

- ❖ Well 01S/05W-21D02, located at 9715 Alder Ave. Bloomington, CA. It is approximately 5 miles Northeast of the project site.
- ❖ Well located at 18850 Orange Street, Bloomington, CA. It is approximately 5.5 miles east of the project site.
- ❖ Well 1S/6W-F21, Located at the Corner of Slover Ave. and Live Oak Avenue, Fontana, CA. It is approximately 1.5 miles east of the project site.

The nearest storm drain is located at the intersection of Slover Avenue and Mulberry Street. There are no drains, swales, curbs, culverts, or other rainwater controls located in the ECI Fontana facility. The tank processing areas, including the tank staging pad, tank rinse pad, and rinsate holding tanks, are equipped with secondary containment that will capture rain water. All rain water that falls inside these process areas is pumped into the rinsate holding tank and managed along with the rinsate process water.

Analysis as to whether or not project activities would:

- a. Violate any water quality standards or waste discharge requirements.

Impact Analysis:

All waste water generated during closure activities will be containerized and shipped off-site to an appropriate recycling facility

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficient 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:

The closure activities are not expected to affect water volumes or the local groundwater table level.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 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 closure activities are not expected to affect existing drainage. There are no water courses located on-site.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 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:

Refer to the responses to items b. and c. Drainage will not be affected.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 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:

Refer to the responses to items a. through d. Rinse water used will be transported off-site for recycling.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- f. Otherwise substantially degrade water quality.

Impact Analysis:

There are no closure project activities that are expected to degrade water quality. Rinse water will be tested prior to off-site disposal.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis:

No structures will be built under the closure project.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- h. 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:

There are no closure project activities that are expected to result in flooding, or levee or dam failure.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

i. Inundation by sieche, tsunami or mudflow.

Impact Analysis:

There are no closure project activities that are expected to result in sieche, tsunami, or mudflows.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

1,2,3

9. Land Use and Planning

Description of Baseline Environmental Conditions:

ECI is located in the incorporated City of Fontana, San Bernardino County, in an industrial use zone. The facility has ceased operations and no longer accepts or recycles UST's. The ECI property is located in a predominately industrial area and is bounded to the north and west by the Superior Trailer manufacturing yard, to the south by Slover Avenue, and to the east by Sammy's Pallet Service. The Southern Pacific Rail Road is located to the north of the ECI property.

Analysis as to whether or not project activities would:

- a. 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 closure plan will not affect land use.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- b. Conflict with any applicable habitat conservation plan or natural community conservation plan.

Impact Analysis: There will be no effects on a conservation plan.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

1,2,7,9

10. Mineral Resources

Description of Baseline Environmental Conditions:

There are no known mineral resources at the facility property.

Analysis as to whether or not project activities would:

Closure plan activities will occur at a maximum of two feet below grade level. No mineral resources are known to exist at the property.

- 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:

No impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

Impact Analysis:

No impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

1,2,3,9

11. Noise

Description of Baseline Environmental Conditions:

ECI is located in an industrially-zoned area. ECI Fontana has ceased operations and no longer accepts or recycles UST's. All hazardous waste has been removed from the property.

The City of Fontana Municipal Code provides that construction activities may be conducted between the hours of 7:00 a.m. and 6:00 p.m. on weekdays, and between the hours of 8:00 a.m. and 5:00 p.m. on Saturdays. Outside these times, a permit is required. The code also provides that: (a) No person shall create or cause to be created any sound which exceeds the noise levels in this section as measured at the property line of any residentially zoned property. The code further provides that: (1) The noise level between 7:00 a.m. and 10:00 p.m. shall not exceed 65 decibels (db)(A), and. (2) The noise level between 10:00 p.m. and 7:00 a.m. shall not exceed 70 db (A).

The nearest residence is approximately one quarter mile away.

Analysis as to whether or not project activities would:

- 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:

Closure plan activities are comparable to Industrial ambient noise levels. The noise levels will be attenuated by distance. At the property line, levels must not be exceeded pursuant to the City of Fontana Municipal Code, as described above. The closure plan activities will comply with these requirements to ensure that the 65 dBA is not exceeded between 7:00 a.m. and 10:00 p.m. and that the 70 dBA level is not exceeded between 10:00 PM and 7:00 AM. Construction activities are expected to occur between the hours of 7:00 a.m. and 6:00 p.m.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis:

There would be a minimal amount of exposure from the trucks movement but it would be comparable to Industrial ambient noise levels.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 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:

The closure plan activities will be temporary and time limited and will conducted within levels established by the City of Fontana Municipal code. Closure activities will be less than the statutory requirement of 180 days.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 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:

Refer to the response to item c above. Project activities will be conducted within acceptable noise limits.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

1,3,9,18

12. Population and Housing

Description of Baseline Environmental Conditions:

ECI Fontana has ceased operations and no longer accepts or recycles USTs.

Analysis as to whether or not project activities would:

Closure activities will not affect housing or populations in the area. Closure activities are short-term and time-limited.

- 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:

Refer to the analysis above for items a and b. Closure activities will not affect housing or populations in the area.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated

- Less Than Significant Impact
 No Impact

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

Impact Analysis:

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis:

There will be no displacement of people or replacement of housing resulting from this project.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

1,2

13. Public Services

Description of Baseline Environmental Conditions:

A chain link fence surrounds the site. Confined space precautions and procedures will followed.

Analysis as to whether or not project activities would:

Confined space precautions and procedures will be followed. Access to the site while work is in progress will be restricted to those persons authorized by the facility. Consequently, no impacts on public services are anticipated.

- 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:

- Fire protection
- Police protection
- Schools
- Parks
- Other public facilities

Impact Analysis:

An underground Service Alert will be contacted at least 48 hours prior to digging. Any required permits and/or oversight agency notifications will be made in advance of field activities. Soil borings and sample collection can be completed within five (5) to 10 days of sample receipt by the designated laboratory.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

9,10

14. Recreation

Description of Baseline Environmental Conditions:

ECI Fontana has ceased operations and no longer accepts or recycles UST's. There are no public recreational areas or facilities within one mile of ECI.

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:

Refer to the Baseline Environmental Conditions. There are no recreational areas near the project site.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis:

Refer to the response to item a. There are no recreational areas near the project site.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

3

15. Transportation and Traffic

Description of Baseline Environmental Conditions:

The ECI property is located in a predominately industrial area and is bounded to the north and west by the Superior Trailer manufacturing yard, to the south by Slover Avenue, and to the east by Sammy's Pallet Service. The Southern Pacific Rail Road is located to the north of the ECI property. ECI Fontana has ceased operations and no longer accepts or recycles UST's. Other industrial operations in the area continue to operate along access roads, Mulberry Street, Calabash Avenue, and Slover Avenue.

Analysis as to whether or not project activities would:

- a. Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections).

Impact Analysis:

Approximately 22,940 gallons of rinse water will be generated and shipped off-site for disposal. It will require no more than three trucks to facilitate the shipping of the rinse water off-site. The rinse water is planned to be shipped to a distance of 46 miles from the facility. Three trucks are anticipated to be used to transport the rinse water at the conclusion of decontamination activities. If contaminated soil and concrete materials must be transported, one end dump will be used to transport up to 50 cubic yards of materials. The drill rig used for obtaining soil samples will be transported to the site on a truck and be transported away when closure activities are complete. Due to the limited,

phased, and short duration of the closure activities, the project is not expected to substantially impact daily industrial activities. The disposal facility is located in Adelanto, California. The route to be taken to the facility is as follows: West from Slover Avenue, left at Foothill Boulevard, right I-15 North, US-395 to Adelanto. The facility is located at 12328 Hibiscus Road, Adelanto, California 92301.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- b. Exceed, either individually or cumulatively, a level of service standard established by the country congestion management agency for designated roads or highway.

Impact Analysis:

Refer to description above

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis:

There are no planned changes to design features, and there will be no incompatible uses under the project.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- d. Result in inadequate emergency access.

Impact Analysis:

The closure plan activities are not expected to interfere with emergency access.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- e. Result in inadequate parking capacity.

Impact Analysis:

Parking will not be affected. Vehicles will be parked on-site.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- f. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks).

Impact Analysis:

No effects to plans or policies will result from the closure plan activities.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

1,3,7

16. Utilities and Service Systems

Description of Baseline Environmental Conditions:

ECI Fontana has ceased operations and no longer accepts or recycles UST's.

Analysis as to whether or not project activities would:

No new facilities will be constructed and all rinse water associated with site closure plan activities will be collected and shipped off-site for disposal.

- a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.

Impact Analysis:

Refer to the analysis above for the responses to items a through c.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 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:

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 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:

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 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:

ECI Fontana is connected to the city water, and it is adequate for planned closure plan activities.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- e. 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.

Impact Analysis:

As stated above, ECI Fontana is connected to the city water, and it is adequate for planned closure plan activities.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- f. Be served by a landfill with sufficient permitted capacity to accommodate the projects solid waste disposal needs.

Impact Analysis:

ECI Fontana has ceased operations and no longer accepts or recycles UST's. Remaining equipment and materials will be removed during the closure plan implementation and will be shipped off site to an appropriate facility in accordance with state and federal laws. The remaining materials and equipment removed will not be significant. Up to 50 cubic yards of contaminated soil and associated concrete may be removed. In the event more than 50 cubic yards of materials require removal, a revised closure plan and a new CEQA evaluation will be prepared.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- g. Comply with federal, state, and local statutes and regulations related to solid waste.

Impact Analysis:

Refer to section f above. Any remaining materials and equipment resulting from closure activities will be shipped to an appropriately authorized facility.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

1

Finding Of De Minimis Impact To Fish, Wildlife And Habitat (Optional)¹
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¹ Complete only if a Finding of De Minimis Impact to fish, wildlife and habitat is proposed in lieu of payment of the Department of Fish and Game Notice of Determination filing fee required pursuant to section 711.4 of the Fish and Game Code. A finding of "no potential adverse effect" must be made to satisfy the requirements for the Finding of De Minimis Impact as required by title 14, California Code of Regulations, section 753.5.

The following provides substantial evidence as to why the project will have **no potential for adverse effect** on the listed resources as defined by section 711.2 of the Fish and Game Code:

- a. Riparian land, rivers, streams, watercourse, and wetlands under state and federal jurisdiction.

Discussion:

Please refer to the Biological Resources section of this Initial Study. ECI is located in an industrial, disturbed area. No rivers, streams or water courses under state or federal jurisdiction are located at the facility.

Finding:

No potential for adverse effect.

- b. Native and non-native plant life and the soil required to sustain habitat for fish and wildlife.

Discussion:

There is no plant life at the facility that provides sustenance for habitat for fish or wildlife.

Finding:

No potential for adverse effect.

- c. Rare and unique plant life and ecological community's dependent on plant life.

Discussion:

There is no unique plant life or ecological community existing at the site.

Finding: No potential for adverse effect.

- d. Listed threatened and endangered plant and animals and the habitat in which they are believed to reside.

Discussion:

As stated in the Biological Resources section and in items a, b and c, there are no endangered plants or animals present at the site.

Finding: No potential for adverse effect.

- e. All species of plant or animals as listed as protected or identified for special management in the Fish and Game Code, the Public Resources Code, the Water Code, or regulation adopted there under.

Discussion:

Please refer to the responses to the above items. No endangered plants or animals are present at the site.

Finding: No potential for adverse effect.

- f. All marine and terrestrial species subject to the jurisdiction of the Department of Fish and Game and the ecological communities in which they reside.

Discussion:

Please refer to the Biological and Hydrological Resources sections of this Initial Study. There are no species present at the site, and the site does not provide habitat for species.

Finding: No potential for adverse effect.

- g. All air and water resources the degradation of which will individually or cumulatively result in a loss of biological diversity among the plants and animals residing in that air and water.

Discussion:

There are no water resources present at the site.

Finding: No potential for adverse effect.

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.

Based on the analysis in the air, biological, geological, hazardous, and hydrological sections of this Initial Study, the project will 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.

The project has not demonstrated effects on air, water, soils, hazards, or transportation to date. No other future projects are planned. No similar projects are currently being implemented in the area of ECI Fontana.

- c. The project has does not have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly.

Based on the analysis in the air, biological, geological, hazardous, and hydrological sections of this Initial Study, there will be no significant impacts from this project.

Determination of Appropriate Environmental Document:

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

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

The proposed project COULD HAVE a significant effect on the environment. However, 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.

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

The proposed project MAY HAVE a "potentially significant impact" or "potentially significant unless mitigated" 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.

The proposed project COULD HAVE a significant effect on the environment. However, 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.

Approvals:

Ryan W Batty 12 / 1 / 06
Preparer's Signature Date

Ryan Batty Hazardous Substances Engineer (916) 255-6699
Preparer's Name Preparer's Title Phone #

Mohinder Sandhu 12 / 1 / 06
Branch Chief Signature Date

Mohinder Sandhu Chief, Standardized Permitting and
Corrective Action Branch (916) 255-3716
Branch Chief Name Branch Chief Title Phone #

ATTACHMENT A

REFERENCES

ECI Fontana

1. Standardized Permit Closure Application, July 2006.
2. Soil Sampling Plan to Evaluate Site Conditions for Closure March 2006.
3. Part B Operational Plan dated May 2004 and last revised January 11, 2005.
4. USGS Topographic (Attachment B).
5. ECI Facility Plot Plan (Attachment C).
6. Area Traffic Map and Area Map (Attachment D).
7. California Department of Fish and Game Natural Diversity Database, Rarefind Report, September 20, 2006.
8. City of Fontana General Plan:
http://www.fontana.org/main/Comm_dev/gen_plan/gen_plan_docs/ch03_land_use.pdf
9. City of Fontana Municipal Code: <http://municipalcodes.lexisnexis.com/codes/fontana/>
10. SCAQMD Permit Number F64154, March 1, 2005.
11. California Air Resources Board web site: <http://www.arb.ca.gov/desig/adm/adm.htm>
12. South Coast Air Quality Management District web site: http://www.aqmd.gov/aqump/docs/2003_AWMP_Chap_2.pdf
13. http://www.ceres.ca.gov/geo_area/counties/Contra_Costa/landmarks.html
14. Native American Heritage Commission, letter, September 26, 2006.
15. Observation by DTSC Project Manager, Ms. Leona Winner.
16. Office of Historic Preservation, California Historical Landmarks for San Bernardino County, October 19, 2006,
<http://www.ohp.parks.ca.gov>.
17. City of Fontana Municipal Code: <http://www.municode.com>
18. Telephone conversation with Mr. Chema Ude, Senior Associate Planner for San Bernardino County, October 19, 2006.
19. South Coast Air Quality Management District, CEQA Air Quality Handbook, April 1993.
20. Department of Toxic Substances Control web site: http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm
21. Attachment E, Construction Emissions Calculations and Additional Assumptions.

ATTACHMENT B

USGS Topographical Map

(See Next Page)

DRAWING NUMBER 119731-A1

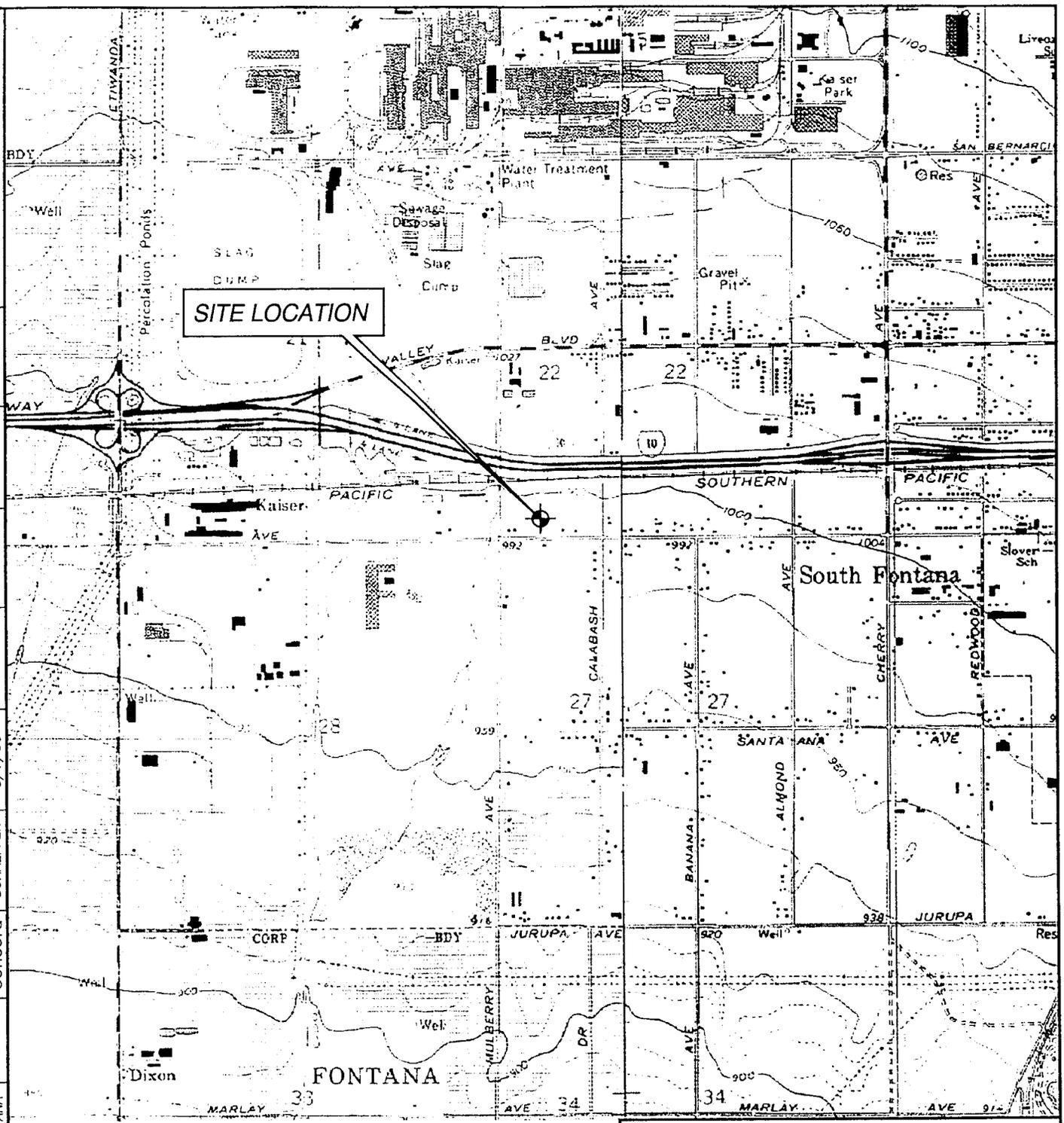
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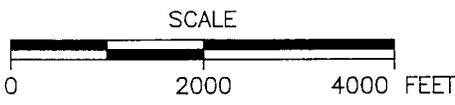
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X-REF FONTANA



REFERENCE:
 7.5' USGS TOPOGRAPHIC QUADRANGLE OF "GUASTI, CA"
 DATED 1978; PHOTOREVISED 1981; SCALE=1:24000



Shaw Shaw Environmental, Inc.

ECOLOGY CONTROL INDUSTRIES
 TORRANCE, CALIFORNIA

FIGURE 1

SITE VICINITY MAP
 ECI FACILITY
 13738 SLOVER AVENUE
 FONTANA, CALIFORNIA

ATTACHMENT C
ECI Facility Plot Plan
(See Next Page)

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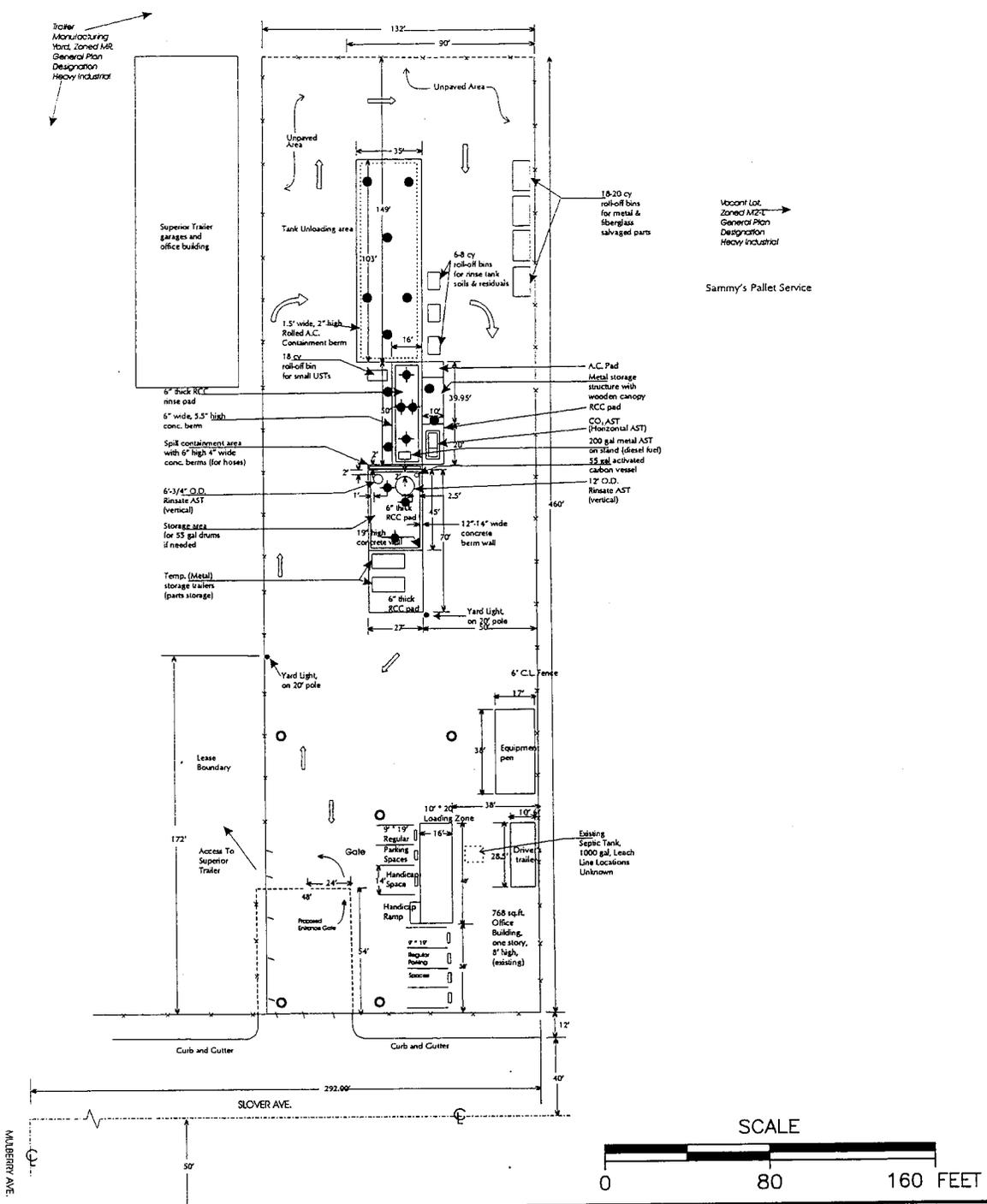
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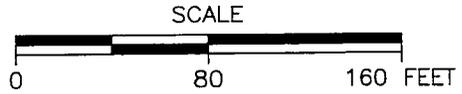
SCHAEFFER 3/7/06

Concord



Vacant Lot
Zoned M2-L
General Plan Designation
Heavy Industrial

Sammy's Pallet Service



LEGEND

- SOIL SAMPLING POINT, COLLECTED 6" AND 2' BELOW SURFACE GRADE
- ◆ CO-LOCATED SOIL AND CONCRETE CORE SAMPLING LOCATIONS, SOIL COLLECTED AT 6" AND 2' BELOW SURFACE GRADE
- BACKGROUND SAMPLES
- FENCE

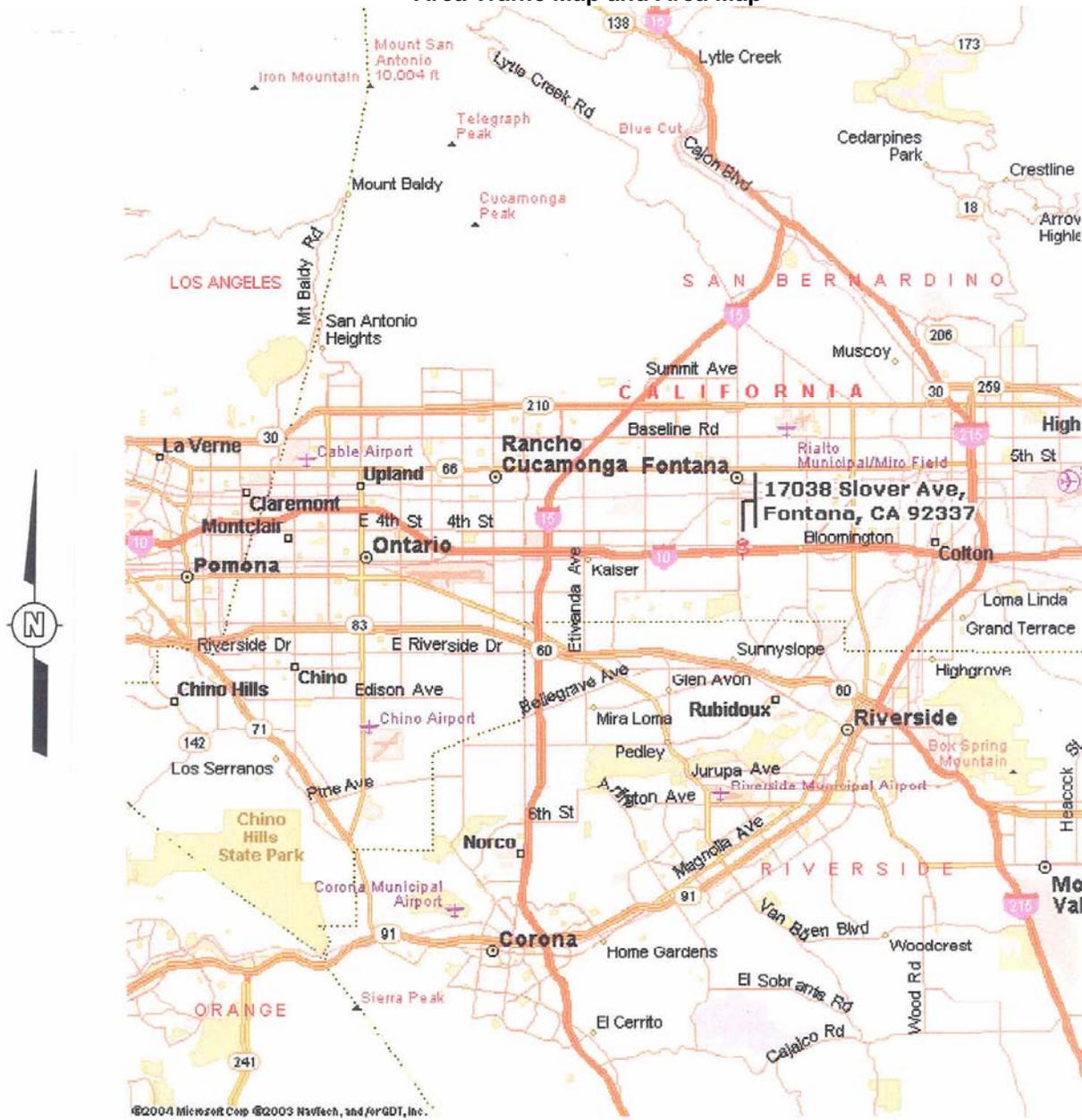


ECOLOGY CONTROL INDUSTRIES
TORRANCE, CALIFORNIA

FIGURE 2
CONFIRMATION SOIL SAMPLE
LOCATIONS
ECI FACILITY
13738 SLOVER AVENUE
FONTANA, CALIFORNIA

ATTACHMENT D

Area Traffic Map and Area Map



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AREA MAP

17038 SLOVER AVE.
FONTANA, CA 92337



ATTACHMENT E

Construction Emissions Calculations and Additional Assumptions

Phase One:

The following vehicles will be used during phase-one closure activities. As previously mentioned phase-one activities will be completed within one week.

- Ten employee vehicles
- One vacuum truck – removal of wash/rinse water generated in the decontamination process
- Two medium flat bed trucks – removal of material and equipment
- One truck (pick-up) mounted sampling rig – direct drive type

Phase Two:

- Equipment to be used:
- One Front End Loader
 - One Dump Truck

The screening tables in Chapter nine of the CEQA Air Quality Handbook (SCAQMD) will be utilized in this analysis.

This analysis will consider the pollutants of primary concern i.e. ROC, NOx, CO and PM10.

The analysis will model the closure as a construction activity using Table 9-1. The ground floor area (GFA) will be determined by adding up the sealed area that will be decontaminated. This area includes the tank holding and processing pads and the rinsate tanks secondary containment.

Tank staging pad	35' x 103'
Tank processing pad	16' x 50'
Area adjacent to processing pad	10' x 60'
Rinsate tanks secondary containment	27' x 45'
Total area	6220 ft ²

The project emissions will be calculated using the following formula

$$E = (\text{Project square footage} / 1,000) \times (\text{Table 9-1 emission factor}) / (\text{Number of days to construct})$$

Pollutant	Emission Factor [lbs / construction period]
ROC	32.79
NOx	481.88
CO	104.79
PM10	34.22

Additional inputs
 Number of days to construct 10 (i.e. two weeks)

The following project emissions were calculated

Pollutant	Emission [lbs / day]	Threshold [lbs / day]	Threshold exceeded [Y / N]
ROC	20.5	55	N
NOx	300	55	Y
CO	65.2	550	N
PM10	21.3	150	N

Only one pollutant, NO_x, had emission above the threshold value.

NO_x emission in phase two will come from two major sources, the dump truck and the loader. These two pieces of equipment will be analyzed to determine if the screening tables accurately predict the emissions.

Dump Truck

Assuming a dump truck holds 10 cubic yards the maximum number of trips per day required will be one. The proposed disposal facility is located 45 miles from the site therefore the round trip will be 90 miles.

Daily truck travel = 90 miles/trip x 1 trips/day
 = 90 miles/day

Investigation has shown that a heavy duty dump truck will produce approximately 15 g of NO_x per mile traveled.

NO_x generated = 15 g/mile x 90 miles/day
 = 1350 g/day
 = 2.98 lbs/day

Front End Loader

The trip to unload the contaminated soil is anticipated to take between 90 minutes and two hours. Loading the dump truck is also estimated to take approximately two hours (we anticipate the balance of the time in each day will be used determining where to dig etc). A dump truck and loader are similar sized vehicles therefore it is reasonable to assume the emissions from both vehicles will be similar.

Using this logic it is reasonable to assume the loader will contribute approximately 3.0 lbs/day of NO_x. Therefore the combined NO_x emissions from the loader and the dump truck are 6.0 lbs/day. Even when construction worker emissions are included in the calculation the emission will not approach the 55 lbs/day threshold.