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: Treatment/Storage/Disposal Facility Closure (Phase I), Romic Environmental Technologies Corporation		**CALSTARS CODING**: PCA: 25045 SITE: 200189-33 MPC: 71
PROJECT ADDRESS: 2081 Bay Road, East Palo Alto, California 94303	**CITY**: East Palo Alto	**COUNTY**: San Mateo
PROJECT SPONSOR: Bay Enterprises, formerly known as Romic Environmental Technologies Corporation	**CONTACT**: Mr. Wayne Kiso	**PHONE**: 650.462.2363

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 Actions Branch 8800 Cal Center Drive Sacramento CA 95826	**CONTACT**: Ms. Suhasini Patel	**PHONE**: 916.255.6428

PROJECT DESCRIPTION:

Bay Enterprises, formerly known as Romic Environmental Technologies Corporation (Romic) operated a large offsite recycling facility at 2081 Bay Road in East Palo Alto, San Mateo County, California, approximately 1/4-mile west of the San Francisco Bay shoreline (see Figures 1 and 2). The Romic facility (Facility) occupies an irregularly-shaped parcel of approximately 14 acres (Site) in the Ravenswood Industrial Area, approximately one mile southwest of the Dumbarton Bridge. Until August 2007, hazardous waste operations occurred at the Facility on approximately 2 of the Site's 14 acres.

Romic operated the Facility since 1964, although other operations at the Site date back to the 1950s. The Facility received hazardous wastes from industries and household hazardous waste collection programs. Some hazardous wastes were recycled for reuse while others were treated and disposed offsite. Romic handled and processed liquid and solid wastes, including fuels, solvents for reclamation, antifreeze for ethylene glycol recovery, corrosive wastes for neutralization, organic solids and contaminated industrial wastewater from many sources. Approximately 5 percent of materials received at the Facility consisted of dyes, photo processing chemicals, detergents and soaps, adhesives, metals, household chemicals and coatings.

Romic's hazardous waste operations were conducted primarily on the central portion of the Facility, which includes warehouses for storing and handling waste, tank farms, distillation processing equipment, a fuel blending operations area, and a field services chemical warehouse. A wastewater treatment plant is located on the south-central portion of the Site. The Facility's administration, laboratory, maintenance buildings, and parking lots are also located on the Site's southern portion. A paved driveway that is approximate 480-feet in length provides access to the site from Bay Road. The site is paved throughout, except for a narrow strip of unpaved area along the perimeter and a gravel parking area near the Bay Road entrance (see Figure 3). The site is sloped to capture drainage and is underlain by a system of drains and sumps.

The California Department of Toxic Substances Control has regulatory authority over the proposed closure activities at the Romic Facility, described within this document as "Phase I." Regulatory oversight of the Facility's corrective action and associated clean-up activities, or "Phase 2," is the responsibility of the United States Environmental Protection Agency (USEPA). USEPA and DTSC will coordinate plans for soil and groundwater remediation with the Facility's closure; however this Initial Study evaluates only the site closure, for which DTSC is the lead agency for California Environmental Quality Act (CEQA) compliance.
On August 29, 2007, DTSC's Enforcement Branch issued a Stipulation and Order to Romic. Romic was ordered to revise its Closure Plan, stop accepting offsite waste, and commence final closure. DTSC received a Draft Final TSD Facility Closure Plan from Romic dated October 26, 2007. The Closure Plan was reviewed by DTSC and USEPA; technical review comments were provided to Romic in a Notice of Deficiency (NOD) on November 27, 2007.

On December 3, 2007, USEPA and DTSC conferred to strategize on a course of action and agreed upon a two-phased approach for the closure of Romic Facility. Romic revised the Closure Plan to address Phase 1 closure activities and it was reviewed jointly by USEPA and DTSC prior to public notice and has been determined to be technically complete. The two agencies have a common goal – to achieve clean closure of Romic's East Palo Alto facility followed by the remediation of soil and groundwater contamination at the Site in a manner that is protective of human health and the environment as outlined below.

PHASE 1:
Closure of the Facility will include the Decontamination, Deconstruction and Disposal (D&D) of all of the above-ground units as listed in Table 1 (Attachment C).

PHASE 2:
Site wide investigation of subsurface contamination and cleanup led by USEPA after Phase 1 has been completed.

Primary Site Areas
The Romic facility consists of four main areas, with buildings and structures arranged as shown on the site plan (Figure 3):

Office and Laboratory Buildings
The office buildings and a laboratory are located in the entry area of the facility
The largest of the three structures is an office building adjacent to the main driveway (Office Building # 2). Office Building #2 has been used for administrative and support functions, but is now largely unoccupied. A second office building is at the north end of the driveway (Office Building #1). Office Building #1 was used for operations management, administrative, and

support functions. A laboratory (Office/Lab Building #3) also is located in this area, west of Office Buildings #1 and #2. There is a temporary structure used as portable offices southwest of the laboratory. The vehicle maintenance building in the southwest area of the facility houses maintenance, engineering, and transportation services.

Production/Process Area

The Production/Process Area is located in the central portion of the facility and contains Tank Farms A, B, CLR, D, G, H, I, J, MNO, and Q (Figure 3). These tank farms provided storage for both raw materials (unprocessed hazardous waste) and processed materials (treated hazardous waste). The Production Area is located down the center of the tank farms. The equipment for the recycling of solvents, such as distillation columns, vacuum pots, and thin film evaporators, are located in this area.

Equipment include waste storage and treatment tanks and tank-like waste treatment process vessels. Romic stored and treated waste in several tank systems with various tank configurations and constructed of materials compatible with the wastes stored.

The DTSC-regulated and unregulated tanks and process vessels currently present on the Facility are described below.

Cone-Bottom Tanks: Carbon steel tanks that would allow the primary settling and separation of sludges in the tanks.
Slope-Bottom Tanks: The sloped bottom design facilitates complete removal of waste from the tank, primarily used for storage.
Dished Tanks: Used in two main process areas – the fuel blending operation and the hazardous waste treatment equipment associated with distillation operations.
Flat-Bottom Tanks: Used primarily for industrial wastewater treatment.
Plastic Tanks: Flat-bottomed tanks made from cross-linked and linear-linked high-density polyethylene (HDPE).
Lined Tanks: Used for corrosive wastes and lined either with epoxy coating or with rubber.
Neutralization Portable Tanks: Used to handle corrosive hazardous wastes and made of cross-linked high density polyethylene.
Fractionators: Upright cylindrical vessels.
Thin Film Evaporators: Vessels with a motorized wipe assembly.
Vacuum Pots: Dished or cone-bottomed vessels with internal heating coils.

The tanks and process vessels are located within identified containment areas (tank farms, production area, liquefaction area), and are bounded by concrete berms or walls. Each containment area is large enough to hold the accumulation of a 25-year, 24-hour rain event, plus either the contents of the largest tank or 10 percent of the total capacity of all tanks in the containment area. There is a 500,000-gallon rainwater tank that was used for the collection of site rainwater.

Storage Buildings

These areas were used to store hazardous wastes that would be processed onsite as well as to store hazardous wastes to be transported offsite for processing. The storage buildings are corrugated metal structures that are open on one, two or three sides, with passive secondary containment systems. The configurations of these structures provide shelter from sun and rain, access for control of fires and spills, and adequate ventilation.

The container storage areas are designed to contain hazardous waste and other hazardous

materials in containers such as drums, sacks, tri-wall boxes, and totes. Each storage area also has secondary containment areas that have been equipped with a sprinkler system.

Two Drum Crushers are located in the North Storage Building; one along its northern edge and another on its southern wall. Adjacent to the North Storage Building is the South Storage Building and the Sampling Area, where container sampling was conducted. Adjacent to the Sampling Area is the drum pumping area, which is used for transferring liquid from drums to tanker trucks. West Storage Building #1 (West #1) is located adjacent to Tank Farm Q, and is separated into two compartments. A lab pack consolidation area is located within the West Storage Building #2. The lab pack area is equipped with an adjacent 23,000 cubic feet per minute (cfm) vapor scrubber unit that is designed to remove organic and inorganic contaminants from the air. Three 20,000-gallon sewer discharge batch tanks are just north of this building. They held water to be tested and discharged to the Palo Alto Regional Water Quality Control Plant.

Support Areas, Access and Parking

The building at the southwest corner of the property provides housing for truck maintenance, plant maintenance and engineering. A truck wash is located adjacent to the rainwater holding tank, near the southerly site boundary. The Romic facility has a narrow driveway that extends to Bay Road and provides vehicular access to the site.

A six- to eight-foot chain link fence and block wall topped with three strands of barbed wire surround the facility, with a video monitored electronic security gate across the driveway from Bay Road (South Gate #1). Two gates near the end of the entry driveway are inactive; two gates are on Tara Road at the western edge of the site (#8 and #9); and two gates (#6 and #7) are located at the north end of the site. A gravel parking area is near the facility entrance on Bay Road, and truck parking is provided along the southerly site boundary.

SUMMARY OF DECONTAMINATION PROCESS

All equipment will be decontaminated before it is considered for resale, scrap or disposal as waste. The decontamination must meet the following decontamination criteria.

1. Equipment exteriors must be configured to allow for full visual inspection and configured internally for adequate flushing and rinsing. In some cases, partial disassembly may be required for thorough decontamination.

2. Equipment must be inspected for any significant erosion, corrosion, cracks, or evident bulging. If such effects are present, the affected piece or detachable component must be discarded as scrap.

3. Internal chambers and voids must be drained of free liquids.

4. Insure that interior spaces do not exhibit greater than 10% Lower Explosive Limit (LEL)

If volatile vapors are present at or above 10% LEL then the equipment will be vacuumed out using a pneumatic vacuum system having an activated carbon filtering scrubber or similar emissions devise.

Free liquids would be removed only over a drip pad placed on top of secondary containment or completely absorbed using an inorganic material.

The scope of decontamination is to conduct wet decontamination work in-place and within the confines of the secondary containment area, including all areas of overspray. Structural fixtures will be dismantled and decontaminated within the confines of secondary containment. All decontamination work and verification of decontamination must be concluded for each item of equipment prior to its removal.

Decontamination setup will begin with a visual inspection and pH testing of structural surfaces and floors for evidence of surface corrosion and to ascertain safe access and the most effective decontamination approach. Decontamination setup considerations will include location within the containment area, placement of temporary berms around non-containment concrete areas, spray barriers or protective sheeting, placement of washing equipment and supplies, water sources and wash water collection points, plugging or sealing of stormwater collection basins, transfer and containment of spent decontamination solution, identification of specific ingress and egress points, and the set up of emergency equipment and Personal Protect Equipment (PPE) decontamination stations.

Gradients and slope will also be considered when determining where to allow pressure wash rinsate to flow for collection and if any temporary filling of cracks or holes (if present) must be completed prior to washing.

If decontamination must be conducted on non-containment areas, then stormwater collection basins will be plugged or sealed using tension plugs or rubber covers so as to prevent seepage of wash water into the stormwater collection system. Washing will be conducted so as to allow spent decontamination water to flow via gravity towards the nearest stormwater collection sump or to be vacuumed up concurrently. For non-containment areas, temporary berms may be used where curbing is not present, to keep wash water contained. The berms may be made of weighted down 4 ft. x 4 inch planks wrapped in 6 milliliter plastic sheeting and placed along the outer edge of the concrete pads. Decontamination work will consist of pressure-washing exterior portions of un-insulated painted or non-painted metal surfaces using a high pressure cold water/low phosphate surfactant solution wash (at or above 2500 psi), working from the highest physical point downward.

Each square foot of surface area will be exposed to direct pressure spray for a minimum of 15-30 seconds. As external surfaces are to be pressure-washed downward, then pressure washing of internal chambers and voids will be conducted at the same vertical level using the same high pressure cold water/low foam surfactant wash inserted into or through each interior using a mole or wide angle rotor washing attachment.

Flushing of interior surfaces may be conducted if pressurized washing and rinsing fails to achieve desired results. Flushing will consist of spraying or pouring a concentrated wetting agent such as Alconox® or Sodium hydroxide solution to reach and remove contamination lodged into small recesses or hidden interior spaces. The flushing solution or “flushate” will be allowed to soak in-place for approximately 15 minutes while keeping the internal surface wet. A flushing rinse using pressurized clean water will follow until the rinsate has a final pH of between 5 and 9 as tested using pH strip paper.

Heavily stained, discolored, or corroded exterior or interior surfaces may need to be pre-soaked for 30-60 minutes after applying a low phosphate surfactant solution directly onto impacted surfaces. After washing, a single rinse using pressurized clean water will be applied in the same manner to remove decontamination wash solution residues at a minimum of 10

seconds of direct pressure per one square foot of surface. Vacuum removal of residual wash or rinse water may be required. This is to be followed with a rinse using pressurized clean water (at or above 2500 psi) applied evenly on surfaces starting from the highest contours and working down. A one yard square surface should be exposed to direct pressure spray for a minimum of 1 minute and should be sufficient to remove decontamination wash solution residues. Washing should be conducted so as to allow spent decontamination water to gravity flow into existing sump(s).

Spent decontamination solution and rinsate will be pumped from containment area sumps or low lying areas around stormwater collection points to a designated wash water holding tank located outside the containment or concrete pad area. A vacuum truck designed to hold non-corrosive rinse water may be used to pump out and transfer wash water to a holding tank located elsewhere onsite.

Decontamination of the tank underside will be conducted after the tank has been decontaminated and lifted and set safely on a transport unit or temporary support saddle. Underside decontamination will consist of setting up a temporary containment pad around the work area and applying dampened rags with a low phosphate cleaning detergent and water directly on the external surfaces. This will be repeated with a clean water wipe.

In decontaminating equipment and surfaces that exhibit a pH at or below 4 when field-tested using wetted pH strip paper (0 – 14), they will be first neutralized using a hand-held pump sprayer to apply a prepared solution of sodium bicarbonate and water (pH of 10+) directly on all external and internal pipe surfaces. Sufficient solution should be applied to insure complete saturation in all recesses, with the solution allowed to remain on treated surface for 15 minutes. Then using a cold water pressure washer, Project personnel will rinse all treated surfaces until the final rinse water exhibits a pH above 4 but below 10.

In decontaminating equipment and surfaces that exhibit a pH higher than 10 when field tested using wetted pH strip paper (0 – 14), they will be first neutralized using a hand held pump sprayer to apply a prepared solution of citric acid (dry) and water (pH of 3-) directly onto all internal and exterior pipe surfaces. Sufficient solution should be applied to insure complete saturation in all recesses, with the solution allowed to remain on treated surface no longer than 5 minutes. Then using a cold water pressure washer, Project personnel will rinse all treated surfaces until the final rinse water exhibits a pH below 10 but above 4.0.

After all of the equipment and structures have been decpontaminated and disposed, the containement pad or the concrete pad will be decontaminated with a high pressure wash and any stained surfaces will be pre-soaked for 30-60 minutes after applying a low phosphate surfactant solution directly onto impacted surfaces. After soaking, a single rinse using pressurized clean water will be applied to remove decontamination wash solution residues at a minimum of 10 seconds of direct pressure per one square foot of surface. Concrete chip samples will be scarbed and analyzed to confirm that decontamination was successful. Only clean concrete surfaces will be left behind at the completion of Phase 1 Closure activities.

SUMMARY OF DECONSTRUCTION AND DEMOLITION PROCESSES

Disassembly

Disassembly of any equipment or system will be conducted only after it has been decontaminated and verified as decontaminated. Exceptions are limited to distinct pieces of equipment or components that must be removed for the purpose of insuring safe and thorough

decontamination. If any piece of equipment or component must be removed before decontamination, it must be marked and tagged to document where and how it is attached to adjoining components, the type of waste processed or contacted by the equipment and the direction of waste processing thorough the piece of equipment or component. Disassembly of any large equipment units for thorough decontamination will be conducted before any of the overhead structures are removed and decontaminated.

Disassembly setup considerations will include an initial check of equipment interior and exterior sections to ascertain safe and most effective decontamination approach.
The disassembly sequence will begin with the removal of electrical services and removable sensors, followed by power and hydraulic systems. This will be followed by conveyance systems, major components, gangways, frameworks and supporting mounts. As each piece of equipment is disconnected a visual inspection will be made of connection surfaces to determine the presence of any gross contamination.

The disassembly of tanks and associated components will be conducted using an overhead crane to support and lift equipment from the tank or supporting pad. Once removed, each piece will be set directly onto a highway transport unit or set temporarily onto a constructed saddle for further decontamination of the underside or for pre-transportation packaging.

The disassembly of columns, reboiler heat exchangers, condensers, reflux pumps, overhead separators, plate and frame condensers and plate and frame chilling condensers will be conducted using an overhead crane to support each piece of equipment while being unbolted or cut away from framework or supporting saddle or platform. Once disconnected, each piece will be lifted up and away from the containment unit and set directly onto a highway transport unit, or unit designed for rail travel, or set temporarily onto a constructed saddle for further pre-transportation packaging. During the disassembly process, any surfaces encountered that were exposed to hazardous materials, such as plate-to-plate interfaces, will be decontaminated individually.

After removal of all equipment, decontamination of the overhead structures and framework within the HWMU will consist of pressure-washing. The disassembly of framework will be conducted using overhead cranes or hoists and performed only after completion of all framework decontamination activities. Each frame section will be cut or unbolted and an overhead crane or track hoe will be used to lift broken-down portions of framework, load them onto highway transport units or units designed for rail travel, or set them temporarily onto a constructed saddle for further pre-transportation packaging.

Transportation of framework to the designated off-site location will be consistent with all applicable 49CFR transportation requirements for general bulk commodities.

Demolition
Demolition will follow disassembly and after limited decontamination of equipment systems designated as waste. Demolition activities will require application of Best Management Practices including dust and vapor suppression, as well as standard health and safety protocols for the protection of the industrial worker and the surrounding human and natural environment.

The demolition of framework for scrap will be conducted using overhead cranes or hoists and performed only after completion of all framework decontamination activities. An overhead crane or track hoe will be used to lift broken-down or cut-up portions of framework and to set

them directly onto a highway transport unit or bulk container for off-site transportation for recycling.

The demolition of tanks and any associated components not suitable as scrap will be conducted using mechanical shears or similar device to crush, shear or render the tank into a form acceptable by the appropriate landfill. An overhead crane or track hoe will be used to lift broken-down equipment and set it directly onto a highway transport unit or bulk waste container. Transportation of (decontaminated) tanks and any associated framework and equipment to the designated disposal facility will be consistent with all applicable 49CFR transportation requirements for bulk non-hazardous waste.

The revised draft Closure Plan details all of the processes involved with D&D of all of the Facility's above-ground equipment, systems and structures in Phase 1. This phase will include decontamination and testing of the existing concrete surfaces. At the conclusion of Phase 1, the site will be devoid of all above ground equipment and standing structures in the processing areas and retain its flat concrete cap. DTSC will provide oversight for all closure activities in Phase 1, serving as the lead agency for CEQA compliance as well as the requirements of 22 CCR 66264 and 66265.

In Phase 2, a comprehensive site-wide investigation will be conducted followed by remediation of subsurface soil and groundwater contamination at the Site. This phase will begin with sampling of soils and groundwater through the decontaminated concrete surfaces. The concrete will be left in place until the subsurface contamination is characterized, to prevent exposure to the contaminants. The sampling and analysis will be conducted after regulated units on the surface are removed. This will make the sampling more efficient and inclusive of areas that were formerly inaccessible.

Romic will submit one comprehensive Sampling and Analysis Plan to satisfy the regulatory requirements of Closure and Corrective Action; as well as Post-Closure requirements. USEPA will be the lead regulatory agency for all activities involved in Phase 2.

Site History:

In 1973, Romic closed two surface impoundments that caused groundwater contamination. In 1988 Romic entered into an agreement with USEPA that required Romic to investigate the extent of soil and groundwater contamination from past operations at the Facility. The investigation found that shallow groundwater (from 5 feet to 75 feet below ground surface) is contaminated with several types of chemicals.

The primary contaminants in the groundwater are volatile organic compounds such as trichloroethene (TCE), vinyl chloride and others. Other types of chemicals detected in the groundwater include semivolatile compounds and metals. Polychlorinated biphenyls (PCBs) have been detected in a few of the groundwater wells. Limited sampling indicates that the VOC-contaminated shallow groundwater has migrated toward the salt marsh located east of the facility and appears to be moving toward San Francisco Bay. Since 1993, Romic has been pumping contaminated groundwater to the Facility's onsite wastewater plant and treating it to remove contaminants before discharging the treated water to the neighboring tidal slough, where it eventually flows to the Bay (USEPA 2008a).

More than 3.5 million gallons of groundwater have been extracted and treated since Romic began remediation under a USEPA Consent Order. A pilot study conducted at the Facility

showed advanced *in situ* bioremediation to be more effective than the extraction and treatment system previously employed. In February 2004 USEPA allowed Romic to expand the biological treatment test system and to use it exclusively as an Interim Remedial Measure. USEPA public noticed the enhanced Biological Treatment and is currently responding to public comments before they make a decision on the proposed remedy for corrective action.

In the years 1999 through 2007 DTSC's Compliance Branch cited Romic for various violations. Romic was operating the Facility under an expired hazardous waste facility permit issued by DTSC in 1986. In considering Romic's Resource Conservation and Recovery Act (RCRA) Part B permit application, DTSC prepared a Draft permit and Environmental Impact Report (EIR) and circulated the documents for public review in 2005.

Romic's compliance history has raised public concerns in East Palo Alto's diverse community. Two local organizations, the Ujima Security Council and Youth United for Community Action (YUCA) have taken issue with Romic's operations and environmental impacts, including environmental justice. In 2005 YUCA filed a complaint with USEPA, challenging Romic's continuance of operations pending permit revision. Labor organizations such as the Silicon Valley Toxics Group and the Santa Clara Center for Occupational Safety and Health have also voiced concerns regarding worker safety at the Facility. The 2005 draft EIR was not finalized; the RCRA permit was not approved.

ORGANIZATION OF THIS DOCUMENT

Attachments A and B provide a list of references used in preparing the Initial Study and a list of the acronyms and abbreviations the reader will encounter in the text. Attachment C provides a table identifying the structures and equipment subject to the proposed D&D activities. The Figures cited throughout the document are included at the back, in Attachment D.

Each of the Impact Categories addressed in the Initial Study starts with a bulleted list of "Project Activities Likely to Create an Impact." These identify the elements of the proposed project that would be likely to affect sensitive or significant resources *if such resources were present*. The presence or absence of sensitive resources and analysis of potential project effects upon them is then described in a checklist format in each of the 16 subsections.

Measures to avoid or reduce all potential adverse effects to a less-than-significant level have been incorporated into project planning and design. These "avoidance and minimization measures" are described in the applicable subsections

ENVIRONMENTAL IMPACT ANALYSIS:

1. Aesthetics

Project Activities Likely to Create an Impact:

- Removal of all above-ground building, structures and objects from the 14-acre Site.
- Retention of paved Site surface following demolition of above-ground features.

Description of Baseline Environmental Conditions:

The project Site has been utilized as a recycling facility for over 50 years. The immediate surrounding area is dominated by commercial/industrial businesses that include auto salvage and wrecking; however, two locally-important natural areas are present nearby. The Palo Alto Baylands Nature Preserve is located southeast of the facility across Bay Road. The Ravenswood Open Space Preserve is adjacent to the east side of the Romic site and also extends north of the site.

The areas immediately west and south of the Site are visually characterized by industrial properties and poorly-maintained vacant parcels. High voltage power lines cross the area. Bay Road, the only access to the Romic facility, is a paved road without gutters or drainage. Figures 5 and 6 show characteristic views entering and within the Romic vicinity.

The Facility is surrounded by a chain link fence and block wall that limits views of the interior of the Site. The Facility is visible from the south/southeast on Bay Road and from adjacent industrial facilities to the west. Recreationalists using the bicycle path and nature preserve may view the Site from the east. From the north/northwest the site is visible to residents of Illinois Street, located at a distance of approximately one-half mile. Figures 7 through 9 show views of the Romic facility from Bay Road and the bicycle path.

The City of East Palo Alto Draft General Plan, Land Use Element (City of East Palo Alto 1998) provides a guide to land use planning and identifies how land will be used in the future. The following goals expressed in the Land Use Element also are related to aesthetic qualities of the local environment:

- Maintaining a quality environment for families.
- Strengthening the community's distinctive image.
- Preserving natural areas that make East Palo Alto unique.

The East Palo Alto Revitalization Plan, Preliminary Draft Chapter 7, Design Guidelines (City of East Palo Alto 2000) provides guidelines for aesthetic elements of the proposed plan. Those that may be applicable to the proposed project include Site Improvements and Landscaping, which includes guidelines for

- Walls, fences and piers
- Plant materials and landscape treatments
- Lighting
- Signs

Analysis as to whether or not project activities would:

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

Impact Analysis:
The project site is not near a scenic vista and the East Palo Alto General Plan (City of East Palo Alto 1998) does not identify a scenic vista within the City. Project-related activities will occur entirely within the fenced Site, and all of the structures that currently exist on the Site will be demolished and removed. As a result, the proposed project is expected to have no impact on any scenic vista and a positive effect on the aesthetic conditions of the general vicinity.

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:
The East Palo Alto General Plan does not identify scenic resources within the City. Specific natural features, such as the bay lands, San Francisquito Creek and the shoreline are, however, identified as resources that provide visual changes in the urban environment that create interest. It states that these "resources need to be preserved and enhanced to maintain the natural physical and visual quality of East Palo Alto" (City of East Palo Alto 1998).

Project-related activities will occur entirely within the fenced Site. Further, the proposed Site closure project would result in the deconstruction of all visible equipment and systems. Although the proposed Closure would result in significant aesthetic changes to the Site itself, the nearest officially designated state scenic highway, Route 280, lies approximately 5 miles southwest of the Site, and no scenic resources would be affected by the proposed activities (Caltrans 2008).

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:
Project-related activities will occur entirely within the fenced site with decontamination and removal of all tanks and process units. As a result, after completion of the proposed project, the visual character of the site will have changed from a large industrial facility to an unoccupied, flat, paved surface. The project will have a potential to enhance the visual character of the site and its surroundings.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ 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:
Romic operated the Facility 24 hours a day throughout the year, requiring nighttime lighting for security and operational reasons. The proposed closure activities will not require additional levels of lighting; however, with the removal of all standing structures changes may be made in the placement or source of lighting (e.g. permanent to temporary). Following completion of the Phase I Closure activities, nighttime lighting will still be necessary for site security; however an overall reduction in permanent light sources is expected. No new sources of substantial light or glare will be added to the Site.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

2. Agricultural Resources

Project Activities Likely to Create an Impact:
Implementation of the Site Closure Plan would not affect agricultural resources. All proposed activities would be restricted to aboveground features on the 14-acre industrial Site and the transportation corridors leading in and out of the Site.

Description of Baseline Environmental Conditions:
The Romic Site is situated entirely within an area defined as "urban and built-up land" in the California Department of Conservation's *Bay Area Region Important Farmland 2004 and Urbanization 1984-2004* (DOC 2004). Nearby and adjacent open space and natural preserves are designated as "other land."

The DOC defines Urban and Built-up Land as, "occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. Common examples include residential, industrial, commercial, institutional facilities, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, and water control structures."

"Other Land" is land not included in any other mapping category (DOC 2004). Common examples include low density rural developments, brush, timber, wetland, and riparian areas not suitable for livestock grazing, confined livestock, poultry, or aquaculture facilities, strip mines, borrow pits, and water bodies smaller than 40 acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land.

Analysis as to whether or not project activities would:

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance 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:
   The project is limited to TSD facility Closure on an existing industrial site within "urban and built-up land" as defined by the California Department of Conservation (DOC 2004). No land conversion will be necessary for project implementation.

   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:
   Although San Mateo County does include lands zoned for agriculture, including "Williamson Act Lands" and Farmland Security Zones (County of San Mateo 2002), the project Site is limited to an existing industrial facility within an urban zone. All project activities would be consistent with existing zoning.

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:
As noted in Sections 2(a) and 2(b), above, the project is limited to TSD facility Closure on an existing industrial site within "urban and built-up land" as defined by the California Department of Conservation (DOC 2004). The proposed facility Closure would neither require nor contribute to any changes in zoning or farmland conversion.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

3. Air Quality

Project Activities Likely to Create an Impact:

- Venting of Tanks and ancillary equipment
- Pressure washing and hydro blasting of tanks and other equipment during decontamination.
- Decontamination activities within secondary containment areas on the Site.
- Addition of approximately 30 vehicles per day, including personnel and construction vehicles and equipment and trucks delivering supplies, over an approximate 12-month period.

Description of Baseline Environmental Conditions:
The project is located within the San Francisco Bay Area Air Basin, which encompasses a nine-county region including all of Alameda, Contra Costa, Santa Clara, San Francisco, San Mateo, Marin and Napa Counties, and the southern portions of Solano and Sonoma Counties. The Peninsula, where the project is located, is a climatological sub region of the Bay Area Air Basin and extends from northwest of San Jose to the south to the Golden Gate bridge to the north (BAAQMD 2008a).

Climate
The proposed project area on the Peninsula is surrounded by a coastal mountain range to the west and another to the east across the Bay. The climate of the region is controlled by a semi-permanent, high-pressure region, centered some 1,100 miles west of central California. In the summer, the high-pressure region blocks low-pressure areas from entering the state. The flow of air is nearly always from the west, both at the surface and aloft, and wind speeds are moderate. Summers are largely sunny (with the exception of fog along the coast) and dry. In the winter, the high-pressure region moves south, allowing low-pressure areas to move south from the Aleutian Islands into northern California. These low-pressure fronts bring rain during the months November through April.

Gaps in the coastal mountain range channel winds down the San Francisco Peninsula. Particularly, the San Bruno Gap tends to channel pollutants released by automobiles and stationary sources upwind of East Palo Alto into East Palo Alto and other locations located downwind. Temperature inversions often form in spring through fall putting a cap on vertical motions of air at lower altitudes and trapping fog, clouds and pollutants at low levels. The inversion layer is often marked by a fog bank that extends from the surface to about 200 feet above ground level in the spring and as high as 2,000 above ground level in the fall. The combination of upwind sources and temperature inversions that restrict vertical dilution, give East Palo Alto a moderate potential for air pollution.

The key meteorological parameters that affect air quality are winds, temperature, and precipitation. Winds as recorded at the Moffett Field meteorological station (5.7 miles to the southeast) and the San Carlos meteorological station (7.3 miles to the northwest), are predominantly from the west/northwest and average 5-10 miles per hour. Maximum summer temperatures are in the low 80s and average low temperatures in the winter are in the high 30s to the low 40s. Average annual rainfall is approximately 16 inches (City of East Palo Alto 2002, 2003).

Air Quality
The federal Clean Air Act and the California Clean Air Act set air quality standards and regulate emissions of pollutants. National Ambient Air Quality Standards have been established for what are known as “criteria” pollutants and the state of California has established more stringent standards for these pollutants. The criteria pollutants are nitrogen dioxide, carbon monoxide, sulfur dioxide, ozone, particulate matter, and lead. Air basins such as the San Francisco Bay Area Air Basin are designated “attainment” or non-attainment” for these criteria pollutants, according to whether they meet or do not meet the federal and state standards. Air quality for toxic air pollutants is determined based on the

risk to human health. The agency responsible for enforcement of the air quality standards and toxic emissions and development of air quality plans in the project area is the Bay Area Air Quality Management District (BAAQMD).

The BAAQMD has developed guidelines for assessing, according to CEQA, the air quality impacts of projects (BAAQMD 1999). These guidelines provide thresholds of significance for criteria pollutants, toxic air emissions, and odors for both the construction and operational phases of a proposed project.

Criteria pollutants measured against federal and California ambient air quality standards in the project vicinity include ozone and PM_{10} (particulate matter less than10 micrometers in size) (USEPA 2008b). The Redwood City monitoring station has been in attainment for ozone and PM_{10} from 1990 to 2006 under federal standards (http://www.epa.gov/air/urbanair).

Analysis as to whether or not project activities would:

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

Impact Analysis:
The BAAQMD is responsible for enforcing the area's air quality plan. If the proposed project does not exceed the BAAQMD thresholds of significance for emissions, then it will not conflict with or obstruct implementation of the air quality plan. The following subsections analyze emissions from the project to determine if they exceed the thresholds of significance.

The Romic Site Closure ("Phase 1") D&D activities would include decontamination and disposal of tanks and process units, and/or waste management units. Furthermore, decontamination and disposal will involve a number of personnel and construction vehicles and equipment as well as trucks delivering supplies and equipment over an approximate 12-month period. All roads and streets used to access the site are paved. The site is also paved at all locations where decontamination will take place. The existing pavement will be decontaminated and left intact. During this phase, both criteria pollutants and toxic air emissions may be emitted from the Romic Facility. Closure activities will require application of Best Management Practices including dust and vapor suppression, as well as standard health and safety protocols for the protection of the industrial worker and the surrounding human and natural environment.

Criteria Pollutants
Minimal amounts of criteria pollutants (including reactive organic gases [ROG], nitrogen monoxide [NO_x], and airborne particulate matter [PM_{10}]) would be produced from pressure washing and hydro blasting the tanks and other equipment as well as decontamination activities within secondary containment areas of the Facility.

The additional employees are expected to add approximately 30 vehicles per day for commuting to the site with six of these adding to the morning and evening daily peak commutes. Estimated emissions from these additional vehicles using the BAAQMD-recommended trip lengths exhaust emission rates, and trip end emission factors are:

ROG: 0.6 lb./day,
$NO_{x:}$ 1.2 lb./day,
$PM_{10:}$ 0.5lb./day

These emissions are well below the threshold quantities of 80 lb/day for these criteria pollutants (BAAQMD 1999). While the Bay Area is in attainment for Carbon Monoxide (CO) under the

national and State of California standards, CO concentrations at locations other than the area monitoring stations can be reason for concern. These locations are usually roadways and intersections where traffic is heavy, usually during the morning and evening commute to work periods. The BAAQMD CEQA Guidelines recommend that calculations of CO concentrations at intersections and roadway segments that are most likely to be impacted by a proposed project be estimated to see if they exceed State of California and national ambient air standards.

The BAAQMD CEQA Guidelines provide formulas and procedures to manually calculate the CO concentrations at impacted intersections and roadway segments. The total CO concentration at a location consists of the sum of the background concentration plus the concentration caused by the local traffic. The project could add a maximum of 30 commute vehicles and 2-3 delivery trucks per day to local traffic. The intersection selected as being the key intersection or the intersection that would probably realize the highest CO concentrations was Bayfront Expressway and University Avenue. These calculations assume that all of the additional project-related traffic would pass daily through this intersection in route to the project site. Traffic volumes for the intersection were obtained from City of East Palo Alto's (2003) Draft EIR, Amendments to General Plan.

The ambient air standard for CO concentration averaged over 8 hours is 9 parts per million (ppm) for both federal and State of California. For averaging over 1 hour, the standard is 35 ppm for federal and 20 ppm for the State of California. The calculated concentrations at the key project intersection in accordance with the procedures provided by the BAAQMD CEQA Guidelines were all well below these standards. Implementation of the project will therefore have an insignificant impact on air quality as measured by CO concentrations.

<u>Toxic Air Emissions</u>
Prior to decontamination, all tanks and ancillary equipment will be vented using vacuum truck equipped with activated carbon filtering scrubber.

An extensive study of toxic air emissions from the Romic facility, both current and post-project, and their potential effect on human health was performed for the facility over the period 2001-2003 (ENVIRON 2001, 2003) when the Facility was operation at full capacity. The results of this study showed that the additional risk to the Maximum Exposed Individual (MEI) of contracting cancer was less than 10 in one million and that ground-level concentrations of non-carcinogenic toxic air contaminants resulted in a Hazard Index less than 1 for the MEI. According to the BAAQMD CEQA Guidelines (1999), this potential exposure to the public would be considered to have a less than significant impact. As the proposed project is limited to D&D, the potential for significant air quality impacts would be even less.

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:
The analysis in the above sections shows that emissions from the proposed project do not exceed the thresholds of significance established by the BAAQMD. The proposed project will therefore

not violate any air quality standard or contribute substantially to an existing or projected air quality standard.

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 in 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 area has been in non-attainment for only one criteria pollutant, PM_{10}. The proposed project will add approximately 0.5 lb/day of PM_{10} to the atmosphere. The BAAQMD threshold of significance for emissions of PM_{10} from a proposed project is 80 lb/day. This small increase of 0.5 lb/day relative to the large threshold of significance will not result in a considerable net increase to the non-attainment pollutant PM_{10}. Closure activities will require application of Best Management Practices including dust and vapor suppression, as well as standard health and safety protocols for the protection of the industrial worker and the surrounding human and natural environment. Therefore the project will cause a less than significant impact on PM_{10} atmospheric concentrations in the area.

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 will emit less than significant amounts of criteria pollutants and therefore will not cause substantial criteria pollutant concentrations. The results of a Human Health Risk Assessment (HHRA) conducted for the Romic Facility by ENVIRON Corporation in 2001, and its 2003 addendum show that exposure to the public, including sensitive receptors, from proposed project toxic emissions would be less than significant. As the proposed project is limited to D&D, the potential for significant air quality impacts would be even less. Therefore, the proposed project will not expose sensitive receptors to substantial pollutant concentrations.

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:

In the HHRA and addendum referenced above (ENVIRON 2001, 2003), estimates of ambient air concentrations of chemicals emitted from the Romic facility were compared to odor thresholds to evaluate whether or not the emissions could pose an odor nuisance to individuals in the vicinity of the facility. A chemical need only be present at concentrations above the odor threshold for the period of time that it takes to inhale (a few seconds) to result in a perceived odor. For this analysis, the 3-minute average ambient air concentrations at the facility boundary were compared with odor thresholds to evaluate the likelihood of odor impacts.

Thirty-five chemicals with odor thresholds less than 1 ppm were selected for odor evaluation. For these chemicals, the estimated 3-minute concentrations were less than the corresponding odor thresholds and for most, the concentration was less than one-tenth of one percent (<0.1%) of their odor thresholds. The highest percentages were 4-methyl-2-pentanone, carbon disulfide and formaldehyde, each at approximately 3 percent.

The proposed project therefore does not have the potential to frequently expose the public to objectionable odors under the BAAQMD CEQA Guidelines and would therefore not have a significant impact.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

f. Result in human exposure to Naturally Occurring Asbestos

Impact Analysis:
The D&D activities associated with the Romic Site Closure ("Phase 1") are limited to work on aboveground equipment on a paved industrial site, with no soil or geological disturbance. The project therefore has no potential for encountering Naturally Occurring Asbestos.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

4. Biological Resources

Project Activities Likely to Create an Impact:

- Noise-producing decontamination and demolition activities
- Generation of airborne particulate matter (*e.g.* PM_{10})
- Temporary increases in vehicle traffic

Description of Baseline Environmental Conditions:
The Romic Facility is located within the City of East Palo Alto, between the East Palo Alto urban area and the western shore of San Francisco Bay. Coastal habitats in the vicinity include salt marshes, brackish sloughs, coastal prairies and coastal sage scrub communities. Elevation of the Romic Site ranges from 4 to 11 feet above mean sea level.

On the east, the Romic Site is separated from Cooley Landing and a salt pond by a slough and levees. Another slough is located on the north side of the facility. Areas to the north and south are designated as the Ravenswood Open Space Preserve and Baylands Nature Preserve, respectively. Salt ponds in the vicinity provide raw material for the chemical industry and are a source of up to 750,000 pounds of brine shrimp annually. Salt ponds adjacent to the Bay are generally diked. The diked marshlands provide habitat for shore birds and other wildlife (City of East Palo Alto 1999).

Sensitive habitats in the project vicinity include seasonal wetlands, tidal salt marshes, salt ponds and riparian habitat. (Wetlands are collectively defined as areas of land that are frequently flooded or ponded, or have permanently or seasonally saturated soils). The slough north of Cooley Landing opens to the Bay and provides regular flooding of the tidal salt marshes, which in turn provide habitat for a diversity of fish and wildlife species.

Plant Communities
Plant communities in the vicinity of the Project Site occur in the developed, industrial area to the south and west of the Facility and in the aquatic environment to the north and east. In the industrial area, plant communities consist primarily of planted vegetation that includes tree groves, street strips, and other landscaped features in an urban setting. Plant communities to the north and east of the facility are comprised primarily of salt-tolerant aquatic species that occur naturally in the sloughs, wetlands and salt ponds.

Common Plant Species
Tree species in the industrial area are mostly ornamentals or other non-native plants, including sweetgum (*Liquidambar styraciflua*) and blue gum (*Eucalyptus globules*). A few native plants are present including coast live oak (*Quercus agrifolia*) and California walnut (*Juglans californica* var. *hindsii*). Shrubs include Oleander (*Nerium oleander*) and native coyote brush (*Baccharis pilularis*). Herbaceous species include prickly ox-tongue (*Picris echiodes*), wild radish (*Rapainus sativus*), yellow star thistle (*Centaurea solstitialis*), and many other non-native invasive plants (City of East Palo Alto 2003).

Plant communities in the aquatic areas north and east of the Romic Facility are generally classified as northern coastal salt marsh, consisting of herbaceous and bushy, salt-tolerant and water-adapted plants (hydrophytes) that form a dense cover to a height of three feet. California cordgrass (*Spartina foliosa*) is often nearest the water, with common pickleweed (*Salicornica virginica*) upgradient, and a rich mixture of species located close to the high ground (JSA 1993). California or Pacific cordgrass is listed as a Species of Local Concern within the Palo Alto and Mountain View topographic quadrangles (CNPS 1994).

Salt marsh vegetation occurs along each of the channels north and south of the salt pond, and between the west levee and residential/industrial area where the Romic Facility is located. The only salt marsh within the salt pond is a small area in the southwest corner of the pond that is at a higher elevation than the remainder of the pond. The back marsh and wetland area adjacent to San Francisco Bay consists primarily of pickleweed, with some alkali heath (*Frankenia grandifolia*) and California cordgrass. The salt pond is different from the rest of the salt marsh area, with reduced plant cover that consists primarily of pickleweed and introduced ice plant (JSA 1992).

Sensitive Plant Species

Two sensitive plant species are expected to be present in the study area – which includes portions of the Palo Alto and Mountain View 7.5-minute USGS topographic quadrangles. The Point Reyes birds-beak (*Cordylanthus maritimus* ssp. *palustris*) is a federal species of concern and appears on CNPS List 1B (rare, threatened, or endangered in California and elsewhere). The California seablite (*Suaeda californica*) is a federal endangered species that is on CNPS List 1B.

Wildlife

There is no viable habitat within the Romic facility; as concrete, asphalt, gravel or buildings cover most of the site. Terrestrial and avian wildlife species that are present or expected to be present in the general project vicinity are primarily associated with the aquatic environment to the north and east of Romic, especially San Francisco Bay.

Common Wildlife Species

Bird surveys of the salt pond and adjacent marshes and slough were conducted to evaluate avian utilization of these habitats. During the surveys, 10,000 to 20,000 shorebirds were observed foraging at the Cooley Landing salt pond, and numerous songbirds were observed foraging in the surrounding grassland-urban area. A more abundant and diverse avifauna was observed during high tide than during low tide. At low tide, ruddy ducks (*Oxyura Jamaicensis*), Greater and lesser scaups (*Aythya Marila*; *Aythya Affinis*), American wigeons (*Anas Americana*), gadwalls (*Anas Strepera*) and herring gulls (*Larus Argentatus*) comprised an estimated 80 percent of all birds. At high tide, shorebirds were the dominant group, with western sandpipers (*Calidris Mauri*) comprising an estimated 75 to 90 percent of birds seen (JSA 1992).

No mammals were observed on the study area during the initial reconnaissance or vegetation surveys conducted by Jenkins, Sanders, and Associates (JSA 1993). Based on available literature and information on habitat types, mammalian species that reside in salt marsh habitats may occur in the general project vicinity

Birds were observed feeding on the mudflat during the JSA (1993) surveys, indicating that the salt pond provides a high tide foraging refuge for over-wintering shorebirds and waterfowl. The levee banks and surrounding wetland also provide forage for a variety of bird species.

Sensitive Wildlife Species

Based on the studies described above, there are 10 sensitive species of birds and two sensitive species of mammals in the in the general project vicinity. Of these, six birds are listed by the United States Fish and Wildlife Service (USFWS) and/or California Department of Fish and Game (CDFG) as threatened or endangered. One of the mammals is a listed species, the salt marsh harvest mouse (*Reithrodontomys raviventris*).

Mammals

Two mammalian species of special interest, the salt marsh harvest mouse and the salt marsh wandering shrew (*Sorex vagrans ssp. halicoetes*), have been observed in the vicinity of the biological study area (JSA, 1993). Both species are endemic to central California salt marshes. The salt marsh harvest mouse, a federal and California endangered species, is found only in salt marshes, diked seasonal wetlands and peripheral grasslands within the San Francisco Bay historic wetlands margin. The wandering shrew, which occurs in the region immediately north of the biological study area (JSA 1993), is a CDFG species of special concern (CDFG 2000). Because both species have been reported in the vicinity of the salt marsh, it is likely they also are present around the sloughs (JSA 1993).

Birds

Special status avian species are known to occur in the tidal wetlands and the Cooley Landing salt pond. The California clapper rail *(Rallus longirostis obsoletus*) is a federal- and state-listed endangered species known to forage and breed along the sloughs in the salt marshes in the vicinity of the biological study area. One clapper rail was seen during the survey (JSA 1993). The Alameda (South Bay) song sparrow (*Melospiza jamaicensis coturniculus*) is a federal species of concern and CDFG species of special concern. It has been observed foraging along the levee banks and surrounding grasslands. The northern harrier (*Circus cyaneus*), also a CDFG species of special concern, has been observed foraging along the levees. The California black rail (*Laterallus jamaicensis* ssp. *corurniculus*), a CDFG Fully Protected and California Threatened Species, is likely to be found feeding along the slough channels in the general Project vicinity. Other special status species that are known to inhabit coastal wetlands and adjacent uplands are unlikely to occur in the biological study area (JSA 1993).

Aquatic Species

There are no known sensitive aquatic species in the vicinity of the Project Site. The east and north sloughs in the study area are expected to be used seasonally by fish species that have been identified in similar habitats in the vicinity. Based on data from adjacent wetlands and other studies of the San Francisco Bay region, various locally-common fish species are likely to be present or become established. These include, but are not limited to, top smelt (*Athrinops affinis*), arrow goby (*Clevelandia ios*), longjaw mudsucker (*Gillichthys mirabilis*), yellowfin goby (*Acanthogobius flavimanus*) and staghorn sculpin (*Leptocottus armatus*) (JSA 1993). There are also a number of common benthic (bottom of the slough) invertebrates that could exist in the vicinity of the project Site.

Regulatory Setting

Federal Endangered Species Act (FESA)

The FESA, as amended, extends legal protection to plants and animals listed as “threatened” or “endangered” by the U.S. Fish and Wildlife Service (USFWS). The USFWS derives its regulatory authority from Sections 7 and 9 of the FESA, which prohibits the import, export, sale, taking or possession of any federally listed species of fish or wildlife. Listed species are those that are threatened or endangered (in danger of extinction throughout all or a significant portion of their range) and have been the subject of final regulation and listing in the Federal Register. Also represented are those species officially proposed for listing in a notice of the Federal Register.

In addition to listed species, a second group of species is identified under the FESA. This group, known as (federal) candidate species or FCS, has not yet been the subject of a proposed or final ruling to become listed. While not provided protection under the FESA, agencies are required to consider candidate species in their planning process (CDFG 2000).

California Endangered Species Act and Native Plant Protection Act

The California Endangered Species Act of 1984 and the California Native Plant Protection Act of 1977 are administered by the California Department of Fish and Game (CDFG). These acts include rare, endangered, threatened and candidate species of plants and wildlife. Candidate species are those that have been accepted by the state for review and potential inclusion on the list of rare, threatened or endangered species. The rare designation applies to plants only and includes those plants that are not threatened or endangered, but that could become eligible to be listed as threatened or endangered due to decreasing numbers or further restrictions to habitat.

California also has identified plant and wildlife Species of Special Concern (SSC). These species are rare, restricted in geographic distribution or declining throughout their geographic range. Downward trends in distribution and population size have been documented for many plant and wildlife species over the last century. Where these patterns appear to be symptomatic of critical decline, the species may be recognized on various “watch lists” published by agencies and conservation groups. Sensitive species are to be considered in resource planning and management. These plant and wildlife species are considered candidates for state listing and are afforded protection from local destruction pursuant to CEQA (§15380).

California Native Plant Society List

The California Native Plant Society (CNPS) maintains an inventory of rare, threatened and endangered plants of the state and lists the plants in one of five categories. Plants of List 1A are plants presumed extinct in California, List 1B plants are rare, threatened or endangered in California and elsewhere, and List 2 plants are rare, threatened or endangered in California, but more common elsewhere. Plants for which the CNPS needs more information are on List 3, and plants of limited distribution are on List 4 (CNPS 1994).

City of East Palo Alto General Plan

The Conservation and Open Space Element of the East Palo Alto General Plan includes goals and policies to protect and maintain state natural resources such as wildlife (City of East Palo Alto 1998). In particular, Conservation/Open Space Goal 2.0 is to “Preserve and enhance important natural resources and features.” The corresponding Policy 2.1 is to “Conserve, protect, and maintain important natural plant and animal communities, such as the Baylands, Cooley Landing, San Francisquito Creek, the shoreline, and significant tree stands.” The Implementation Program of the General Plan provides strategies to implement the above goal and policy. In addition, future developments in East Palo Alto potentially affecting wildlife habitat are subject to regulations of the USFWS and CDFG.

San Mateo County General Plan

The San Mateo County General Plan includes an inventory of county-wide fish and wildlife resources. The plan includes goals, policies, and programs for development, management, preservation and conservation of County resources (County of San Mateo 1992).

Bay Conservation and Development Commission

The Bay Conservation and Development Commission (BCDC), created in 1965 by the McAteer-Petris Act, has jurisdiction over all areas of San Francisco Bay subject to tidal action, including a shoreline band extending 100 feet inland. The BCDC also has jurisdiction over salt ponds, managed wetlands, and certain other waterways and marshlands. This agency has the authority to grant development permits within its San Francisco Bay jurisdiction for projects that involve filling, excavation or substantial change in use (City of East Palo Alto 1999). The proposed project would not involve these activities, but areas near the Romic facility fall under BCDC jurisdiction.

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:
The proposed project will occur within the existing Facility boundary. The Facility is fenced, and there is no viable ecological habitat onsite, as concrete, asphalt, gravel or buildings cover most of the Site. As a result, the proposed project will not have a significant adverse impact on plant or wildlife species in the area, including candidate, sensitive or special status species.

The Project will be implemented following Best Management Practices and the Facility's existing operational procedures, including loading and unloading trucks within the boundaries of the facility, discharging wastewater to the sewer, and use of containment berms and basins to keep accidental releases within the site; ensuring the project will negligible or no effect on offsite plant and animal life.

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:
Two sensitive plant species, the Point Reyes birds-beak (*Cordylanthus maritimus* ssp. *palustris*), a federal species of concern, and the California seablite (*Suaeda californica*), a federal endangered species, are expected to be in the general vicinity of the proposed project. In addition, there are sensitive mammals and birds that are expected to inhabit the area around the Romic facility. Mammals include the salt marsh harvest mouse (*Reithrodontomys raviventris*), a federal and California endangered species, and the salt marsh wandering shrew (*Sorex vagrans ssp. halicoetes*), a CDFG species of special concern**.** Birds include The California clapper rail *(Rallus longirostis obsoletus*), a federal- and state-listed endangered species, the Alameda (South Bay) song sparrow (*Melospiza jamaicensis coturniculus*), a federal species of concern and CDFG species of special concern, the northern harrier (*Circus cyaneus*), also a CDFG species of special concern, and the California black rail (*Laterallus jamaicensis* ssp. *corurniculus*), a CDFG Fully Protected and California Threatened Species,

Since the proposed project will occur entirely within the boundary of the Romic facility where there is no riparian or other habitat for the species listed above, the project-related activities will not affect any sensitive species or their habitats existing outside the project site.

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:
Wetlands exist to the east of the Romic facility in the form of marshes and the San Francisco Bay. Since the proposed project activities would be confined entirely within the boundary of the Romic facility, implementation of the Facility Closure Plan will have no effect on federally-protected wetlands.

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:
The proposed project will occur entirely within the boundary of the Romic facility where no wildlife habitat or wetlands are present. As a result, project-related activities will have negligible or no impact on wildlife.

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:
The policy of the City of East Palo Alto is to conserve, protect, and maintain important natural plant and animal communities, such as the Baylands, Cooley Landing, San Francisquito Creek, the shoreline, and significant tree stands. The City's General Plan, as amended (City of East Palo Alto 2002, 2003) includes goals, policies, and programs for development, management, preservation and conservation of fish and wildlife resources. Since the proposed project will occur entirely within the boundary of the Romic facility and will not affect any plant, fish, or wildlife habitat, it will not conflict with or significantly affect any protective policies, ordinances or habitat conservation plans.

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:
Since the proposed project will occur entirely within the boundary of the Romic facility and will not affect any plant, fish, or wildlife habitat, it will not conflict with or significantly affect any protective policies, ordinances or habitat conservation plans.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

5. Cultural Resources

Project Activities Likely to Create an Impact:

- Removal of all above-ground building, structures and objects from the 14-acre Site.

Description of Baseline Environmental Conditions:

The Romic facility is located in East Palo Alto's Ravenswood Industrial Area, west of San Francisco Bay. Native American archaeological sites in this area were occupied at least 5,000 years ago, and ethnographic sources document the specific presence of the *Ohlone* tribe until the late 1600s. The traditional lifeways of the *Ohlone* were severely impacted during the Spanish Mission Era and colonization and their population was significantly reduced by diseases introduced to California by the Europeans. Some of the secularized Mission Indian families obtained formal Mexican land grants, while the majority of the others found refuge on the rancho lands of friendly *Californio* families. In the 19th Century, during Spanish rule, East Palo Alto was the eastern border to Rancho de Las Pulgas, one of the largest ranchos in the California territories (Muwekma.org 2008; National Park Service 2008).

After California became part of the United States in the mid-1800s, Americans started to settle in the area to search for gold. Native American rancherias were established on rancho lands in the South Bay, West Bay and especially in the East Bay. At least six *Ohlone* rancheria communities emerged and maintained themselves during the 19th and early 20th centuries in the East Bay (Muwekma.org 2008). In 1848, Cooley's Landing was constructed at the end of Bay Road to promote and facilitate local trading. In 1850, the community of Ravenswood was founded. During the 1900s, the farming community of Runnymede was established. In 1925 the cities of Runnymede and Ravenswood merged and became the City of East Palo Alto. The first major industry, Hiller Aircraft Company, arrived in 1947, and the City began a period of growth (City of East Palo Alto 1999). Industrial operations at the Romic Site began about 50 years ago; Romic has operated the Facility since 1964.

Archaeological Resources

The nearest recorded pre-European archaeological site is located approximately 0.4 mile from the Romic facility and was once a large Native American village. The 3,000 year old site was discovered during the construction of a subdivision and heavily excavated in the mid-20th century. Two other archaeological sites are documented within one mile of the Romic facility.

Paleontological Resources

While ancient fossilized remains of land vertebrates, fossilized beds of oysters, scallops, and clams, and fossilized plants have been found in the Bay Area, no paleontological resources have been identified in the City of East Palo Alto.

Historical Resources

The City of East Palo has no sites listed on the National Register of Historic Places; however, the City maintains a list of locally-important historic resources. The nearest of these are two residences on Weeks Street, located approximately 0.3 mile south/southwest of the Romic facility. About one-half mile west of the project Site is Cooley's Landing (Port of Ravenswood) that juts into San Francisco Bay at the eastern terminus of Bay Road (City of East Palo Alto 1998).

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:
The proposed project will be implemented entirely within an existing industrial site that post-dates the historic period and therefore will not affect the significance of any historical resources.

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 archaeological resource pursuant to §15064.5.

Impact Analysis:
There are no known archaeological resources on the project Site (City of East Palo Alto 1998, 1999). The proposed Site Closure activities are limited to work on above-ground equipment and site structures and the existing hardscape will remain in place. There will be no grading or soil disturbance and therefore the project has no potential to affect any documented or undocumented archaeological resources.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

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

Impact Analysis:
No paleontological resources have been discovered in East Palo Alto (City of East Palo Alto 1998) and there are no known paleontological resources on the project Site. The proposed Site Closure activities are limited to work on above-ground equipment and site structures and the existing hardscape will remain in place. There will be no grading or soil disturbance and therefore the project has no potential to affect any documented or undocumented paleontological resources

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 have been discovered on the project Site. The proposed Site Closure activities are limited to work on above-ground equipment and site structures and the existing

hardscape will remain in place. There will be no grading or soil disturbance and therefore the project has no potential to affect any documented or undocumented human remains.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

6. Geology and Soils

Project Activities Likely to Create an Impact:
Implementation of the Site Closure Plan would not affect existing geological conditions or soils. All proposed activities would be restricted to aboveground features on the approximately 14-acre industrial Site and the transportation corridors leading in and out of the Site.

Description of Baseline Environmental Conditions:
The following information is based on available published and unpublished maps and literature, pertinent site-specific studies, Resource Conservation and Recovery Act (RCRA) facility investigations, and risk assessments conducted as part of the Part B Permit Application.

Regional Setting

Regional Geomorphology

The Romic facility is located within the central portion of the Coast Range Geomorphic Province. The Coast Range consists of a sequence of northwest trending mountains and valleys, aligned with and adjacent to the California coastline. The Coast Range extends eastward from the Pacific coast to the San Joaquin Valley and averages 60 miles in width. A dominant structural feature of the Coast Range Province is the northwest trending San Andreas Fault, which is located 10 miles to the west of the city of East Palo Alto.

The Romic facility is located within the Bay Plain physiographic region (HLA 1991) about one-half mile west of San Francisco Bay, in the City of East Palo Alto. The land slopes towards the Bay to the northeast and is characterized by generally flat topography (approximately 4 to 11 feet above mean sea level [msl]). Land to the west is fairly flat (approximately 20 to 40 feet above msl and rises up to approximately 2000 feet above msl at the Santa Cruz Mountains, approximately 10 miles south and west of the Romic site. The Bay Plain region also contains tidelands associated with San Francisco Bay (City of East Palo Alto 1998).

The Bay Plain region is underlain by interbedded alluvial deposits and fine-grained marine deposits of Pleistocene to Recent age. Alluvial sediments consist predominantly of gravel and sand deposits with some clay, and have the same makeup as the Niles Cone fan, which consists of sediments shed westward from the Diablo Range into the lowlands presently occupied by the San Francisco Bay. The marine deposits and estuarine muds are associated with deposition in shallow bay environments similar to the present-day San Francisco Bay. West of the region, Niles Cone alluvial deposits intermingle with alluvium of the San Francisquito Cone, which consists of sediments from the Santa Cruz Mountains to the west. General trends throughout the southern part of the San Francisco Bay indicate that the alluvial deposits are coarser grained and thicker toward the Santa Cruz mountains to the southwest (HLA 1991).

Regional Stratigraphy

Surficial geologic units within the City of East Palo Alto are mapped as followed on the *Preliminary Geologic Map of the Onshore Part of the Palo Alto 1:100,000 Quadrangle* (USGS 1993a):

- *Qhl* - Natural levee deposits (Holocene). Loose, moderately to well-sorted sandy or clayey silt grading to sandy or silty clay. These deposits are porous and permeable and provide conduits for transport of ground water. Unit thickness is 50 feet near heads of fans.
- *Qhfp* – Flood plain deposits (Holocene). Unconsolidated to moderately consolidated, moderately sorted fine sand, silt and clayey silt deposited at the edge of coarse-grained alluvial fans (*Qhl*). Forms much of the flatland alluvial plain. Unit is generally less than 20 feet thick.

- *Qhb* - Basin deposits (Holocene). Unconsolidated, poorly sorted, plastic, organic clay and silty clay in poorly drained interfluvial basins, usually at margins of tidal marshlands. Locally contains thin well-sorted interbeds of sand and fine gravel; contains modern vertebrate and invertebrate fossils. Unit is generally less than 15 feet thick.
- *Qhbm* - Bay mud (Holocene). Very poorly consolidated to well-consolidated, water-saturated organic clay and silt, with lenses of sand, shells and layers of peat. Bedding ranges from distinct to indistinct. Deposited in brackish to saline water along the margin of San Francisco Bay. When wet, has low to moderate potential for liquefaction under seismic loading conditions. Unit is at least 66 feet thick and may be as thick as 280 feet along the Bay margin.

Regional Soils

Six soil units are found within the region of East Palo Alto (USGS 1993b):

- Botella-Urban land complex with 0 to 5 percent slopes. Botella soil (clay loam) is very deep and well drained. It formed in alluvium derived from various rock types and is found on alluvial fans, old flood plains and stream terraces. The Urban land consists of areas covered by asphalt, concrete, buildings and other structures. The material beneath these structures consists of soils that are similar to the Botella soil. Permeability is moderately slow. Runoff is slow and the hazard of water erosion is slight. The unit has few limitations for homesite and urban development.
- Novato clay with 0 to 1 percent slopes. This very deep, very poorly drained soil is found in saltwater marshes along the edges of San Francisco Bay. It formed in alluvium derived from various rock types. Permeability is slow in the Novato soil. Runoff is very slow and the hazard of water erosion is null. It is subject to tidal flooding. The water level fluctuates from 2 feet above the surface at high tide to 2 feet below the surface at low tide. This unit is used as wildlife habitat.
- Novato clay with 0 to 1 percent slopes, ponded. This very deep, very poorly drained soil is found in saltwater marshes along the edges of San Francisco Bay. It formed in alluvium derived from various rock types. Permeability is slow in the Novato soil. Runoff is very slow and the hazard of water erosion is null. This unit is used as evaporation ponds for the production of salt.
- Urban land. This unit consists of areas where more than 85 percent of the surface is covered by asphalt, concrete, buildings and other structures. This unit is used for homesite, urban and recreational development.
- Urban land-Orthents, cut and fill complex with 0 to 5 percent slopes. This unit is on coastal terraces and alluvial fans. The Urban land consists of areas that are covered by asphalt, concrete, buildings, and other structures. The material covered by these structures is similar to the Orthents. The Orthent consists of soils that have cut and filled for urban development. They are dominantly deep and are loam or clay loam. Runoff is slow and the hazard of water erosion is slight. Excavation for roads and buildings increases the risk of erosion. The unit has few limitations when used for homesite and urban development.
- Urban land-Orthents, reclaimed complex with 0 to 2 percent slopes. This unit is found in areas that were once part of San Francisco Bay and adjacent tidal flats. The Urban land consists of areas that are covered by asphalt, concrete, buildings, and other structures. The material covered by these structures is similar to the Orthents. The Orthent consists of soils that are very deep and are poorly drained and somewhat poorly drained. They are made up of soil material, gravel, broken cement and asphalt, bay mud, and solid waste material. Runoff is slow and hazard of water erosion is low. If the unit is used for urban and recreational development, the main limitations are the susceptibility of the soils to subsidence and the highly variable soil properties, including texture and permeability. A high water table is also a limitation in some areas.

The City of East Palo Alto is on the northern edge of an area that has experienced an estimated 2.5 feet of subsidence since 1934 due to the withdrawal of groundwater. A groundwater recharge program, implemented in the Santa Clara Valley, has virtually eliminated subsidence in the area.

Under current groundwater management practices, the likelihood of further subsidence is minimal (City of East Palo Alto 1999).

Regional Faulting and Seismicity

The City of East Palo Alto is located in a region with active (i.e. Holocene) faults. The San Andreas Fault runs the length of the San Francisco peninsula, approximately 8 miles west of the City. The Hayward fault runs along the eastern side of San Francisco Bay, approximately 10 miles east of the Romic facility. Both are major, active faults. Movement along a major fault anywhere in the Bay Area would likely result in moderate to severe ground shaking in East Palo Alto. Surface faults indicating Holocene movement were not identified within a 3,000-foot radius of the site. The site is located within 200 feet of the eastern edge of the buried Redwood City Fault zone. This buried fault ceased movement prior to Holocene time (USGS 1993b).

Additionally, some areas within East Palo Alto have been identified as having the potential for liquefaction in the event of seismic activity (City of East Palo Alto 1998).

Project Site

Site Geomorphology and Stratigraphy

The Romic facility is located within the fine-grained portion of the basin deposits (identified as the Niles Cone fan) and in the Bay muds. Changes in the San Francisco Bay water level, historic flooding, and stream channel shifts have resulted in alternating units of coarse sand and fine-grained sediments immediately below the facility. The "Ravenswood boring," drilled near the Romic facility, extends to a depth of 555 feet into bedrock, indicating the great thickness of unconsolidated alluvial and fluvial material (Dames & Moore 1989).

Surface elevations on the Romic site range between 4 and 11 feet above msl. Elevations are generally higher along the perimeter and lower in the center portion of the site.

Site Soils

Most of the site is covered by asphalt paving except for a gravel-covered parking area. Beneath the asphalt and gravel, the site is capped by up to 8 feet of heterogeneous fill material, which is underlain by an estimated 500 to 1,000 feet of alluvial and estuarine sediments. The fill ranges in grain size from clay to gravel with organic material intermixed. The fill was characterized by drilling fifteen soil borings on the site as part of a Corrective Action Study required in the Hazardous Waste Facility Permit issued to Romic in May 1986. Underlying the fill material is a clay layer up to 10 feet thick. Underlying this clay, there is a sand and gravel layer, up to 9 feet thick. The fill material is underlain by four discontinuous water-bearing zones.

Site Mineral Resources

The City of East Palo Alto General Plan, Conservation and Open Space Element, contains goals and policies to protect and maintain natural resources such as water, soils, wildlife and minerals, and to prevent wasteful resource exploitation, degradation and destruction. No important state mineral resources have been designated within East Palo Alto (City of East Palo Alto 1998).

Non-seismic Hazards
Ground settlement, collapsible soils or subsidence are not anticipated under the Romic site; the underlying materials are unconsolidated bedrock or engineered fill. Landslides, mudslides and debris flows in the area are unlikely as the topography of East Palo Alto area is relatively flat.

Local Faulting and Seismicity
No known active faults exist within the City of East Palo Alto. The buried Redwood City fault zone runs northwest through the southeast side of the City, but is not active. Consequently, the potential for ground rupture is low, and an Alquist-Priolo Special Study Zone has not been established by the state for this area (CGS 1997).

The City of Palo Alto lies within an area that has potential for strong ground movement/shaking during the next 30 years. Active faults in the area including the San Andreas (8 miles west) and the Hayward (10 miles east) can be expected to produce a range of ground movement/shaking at the project site. The unconsolidated alluvial material that underlies the project site could intensify ground movement/shaking in the event of an earthquake (City of East Palo Alto 2003).

Areas within East Palo Alto have been identified as having "low," "moderate" or "high" potential for liquefaction in the event of seismic activity. The Romic facility is located in the area of East Palo Alto east of University Avenue and north of Highway 101, which is in the "moderate to low" range. There is a 0.1 to 1.0 percent probability of liquefiable sediments in this area (City of East Palo Alto 1998).

The California Alquist-Priolo Faulting Zone Act requires California Geological Survey (CGS) to delineate "special studies" zones along known active faults, with the intent of prohibiting human occupancy across traces of active faults. While the proposed project does not involve human occupancy, the Alquist-Priolo special studies zones and CGS's definition of active faults are used in this analysis. According to the California Public Resources Code, an "active fault" is defined as one with surface displacement within Holocene time (approximately the last 11,000 years). A "potentially active" fault is defined as one that has shown displacement in the Quaternary period (the last 1.6 million years) with unknown Holocene activity. If CGS determines that a Quaternary fault has not produced surface displacement during the Holocene period, the fault is considered "not active."

Although the City of East Palo Alto and the Site are located in a seismically active area, no active faults are located beneath the Site or within 200 feet of the Site (CGS 1997).

<u>Analysis as to whether or not project activities would</u>:

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.
   - Strong seismic ground shaking.
   - Seismic-related ground failure, including liquefaction.
   - Landslides.

   Impact Analysis:
   A sufficiently strong earthquake could topple or rupture tanks and other containers at the Romic facility leading to releases of hazardous waste/material. The potential intensity of the maximum expected earthquake at the site is VIII on the Modified Mercalli Intensity Scale (City of East Palo

Alto 2003). This intensity level would have an average peak acceleration of 0.34-0.65g, resulting in only slight damage in specially designed structures, but considerable damage in ordinary substantial buildings with possible, partial collapse. Damage in poorly built structures would be great. There is a 21 percent estimated chance for a large earthquake on the San Andreas Fault (8 miles west of the site) in the next 30 years and a 27 percent chance for the Hayward fault located 10 miles east of the site (City of East Palo Alto 2003).

There is no evidence that any active or potentially active faults are located beneath the site. Therefore, the potential for fault-related ground rupture is low. Due to the presence of numerous faults in the project region, there is a moderate to high potential that the site will experience ground shaking over its lifetime during an earthquake. The site area is relatively flat and has been previously graded. Thus, the potential for landslides is low.

The Romic facility withstood the large 1989 Loma Prieta earthquake caused by the San Andreas Fault with little or no damage to tanks or process units or releases of hazardous waste/material. Romic had an engineering seismic risk analysis performed for its facility (Plecnik 2003). Based on the analysis of three boring soil samples, the study concluded that liquefaction is unlikely to occur at the site.

The project activity involves decontamination, disassembly and removal of all tanks and equipments from the site and exposure of people or structures to potential substantial adverse effects due to an earthquake will be less than significant.

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:
Soil erosion from water or wind due to implementation of the proposed project will be less than significant since the site is and will remain predominantly covered with concrete or asphalt.

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:
The soils in the area have a low to moderate potential for liquefaction due to the high water table and soil types present. The seismic risk analysis cited above concluded that liquefaction is unlikely to occur at the Romic facility and that the maximum settlement under the design earthquake would be less than 0.6 inches. Therefore, the potential impact of unstable soil on the project is less than significant.

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:
Soils in the project vicinity consist of a clay loam which has a moderate shrink-swell potential. The existing facility has not been affected by expansive soils and the impact of expansive soil on the proposed project is expected to be less than significant.

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:
A septic system will not be used at the facility and therefore there will be no impact on soil from use of a septic or other water disposal system.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

f. Be located in an area containing naturally occurring asbestos

Impact Analysis:
The D&D activities associated with the Romic Site Closure ("Phase 1") are limited to work on aboveground equipment on a paved industrial site, with no soil or geological disturbance. The project therefore has no potential for encountering Naturally Occurring Asbestos.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

7. Hazards and Hazardous Materials

Project Activities Likely to Create an Impact:

- Pressure washing and hydro blasting of tanks and other equipment during decontamination.
- Decontamination activities within secondary containment areas on the Site.
- Transportation of wastewater from decontamination, scrap materials and decontaminated equipment offsite.

Description of Baseline Environmental Conditions:

- The Romic Facility was primarily involved with recycling waste solvents to produce reusable solvents, blending wastes to produce fuel-grade materials, recycling antifreeze and treating industrial wastewater. Most of the industrial wastes shipped to the Facility for recycling and processing were solvents, antifreeze, industrial wastewater and other oil-based chemicals. These general wastes comprised about 95 percent of the materials recycled and processed at the Facility. The remainder consisted of dyes, photo processing chemicals, detergents/soaps, adhesives, metals, household hazardous waste and coatings.

Waste Delivery and Sampling

Wastes were transported to the Facility by licensed hazardous waste transporters in cans, drums, totes, roll-off containers, and tank trucks accompanied by the California hazardous waste manifest. Each container manifested in the facility was inspected, sampled, tested and marked with a unique tracking number prior to and stored in a designated storage area prior to transferring to the assigned process area. All of the storage areas at the site are equipped with secondary containment and are designed so that incompatible wastes are segregated.

Waste Treatment and Temporary Storage

After analysis and approval, container loads and bulk loads (tanker trucks) were off-loaded at the appropriate areas for temporary storage or for treatment. Areas where liquids stored in tanks and drums were placed, are built on 6 inches or more of impermeable concrete and are surrounded by berms or low walls. This provides secondary containment in the event of an inadvertent release.

Onsite-Generated Hazardous Wastes

Some of the onsite processes resulted in the generation of hazardous waste as listed below. Process treatment residuals were managed in the same manner as wastes received from outside the facility. Onsite-generated hazardous wastes included:

- Used oil (from vehicle maintenance)
- Laboratory wastes
- Universal wastes (light, batteries, CRTs)
- Lead-acid batteries
- Non-empty containers of process chemicals

These waste streams may have been managed onsite in one or more 55-gallon drums, 40-cubic yard bins or other containers, as appropriate. Some onsite-generated waste streams may have been consolidated with offsite wastes. For example, certain laboratory wastes may be consolidated with similar wastes for fuel blending or other processes.

A broad range of wastes may have been sent for offsite hazardous waste management, subject to acceptance criteria of the offsite facility. Wastes such as contaminated soil, surplus chemicals, wastewater treatment sludges, non-RCRA process residuals, spill cleanup materials and empty containers may have been sent offsite for incineration, treatment, and/or land disposal.

Project Summary
All of the offsite waste and on-site generated hazardous waste inventory has been eliminated as stipulated in DTSC's Enforcement order dated August 29, 2007 (DTSC 2007). The project activities will involve decontamination of tanks used for treatment, and equipment used for processing hazardous waste. The decontamination will generate wastewater that will be sampled and analyzed before it is transported offsite for treatment.

Decontaminated equipment will be confirmed by collecting the final Rinsate for analysis. If the confirmation sample analysis meets the Decontamination Performance Criteria per the approved Closure Plan, the decontaminated equipment may be offered for re-sale to be used a registered and permitted facility for similar use with DTSC's approval. The receiving facility would have to provide certification to DTSC before the equipment is allowed to be shipped offsite.

Most of the non-porous metals would be decontaminated to meet the Scrap Decontamination Performance Criteria per the approved Closure Plan. If the confirmation samples are acceptable, then the metals may be offered as scrap metal to licensed metal salvagers and recyclers who will direct the metal to the metal forging industry for melting and reforming. Scrap metal will not be released to the general public for any type of reuse.

All of the decontaminated equipment with confirmation sample analysis that does not meet the Decontamination Performance Criteria per the approved Closure Plan, will be deconstructed and shipped as hazardous waste to a landfill. The shipment and transportation details will be recorded and made part the Facility's closure report.

All decontamination and deconstruction of decontaminated equipment will done within secondary containment areas. The secondary containment area will then be decontaminated after all of the above ground equipment and structures within the area have been removed. The concrete will also be tested to meet the decontamination Performance Criteria of the approved Closure Plan and either disposed off site as hazardous waste or left in place depending on the test results of the confirmation sampling.

<u>Analysis as to whether or not project activities would</u>:

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

   Impact Analysis:
   The project is limited to Decontamination, Deconstruction and Disposal (D&D) of all of the above-ground units at the Romic Facility as Phase I of the Facility's Closure. Transportation and disposal of any hazardous materials will be short-term activities with specific controls (described in Section 7[b], below). No routine transport, use or disposal of hazardous materials will occur as a result of this project.

   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:
The D&D activities will be conducted in compliance with the approved Closure Plan, and Health and Safety and Contingency Plans will also be required for the protection of site workers. All equipment will be inspected visually prior to its decontamination, to ensure successful decontamination in a manner that is protective of human health and the environment. In the event there is an accident, trained personnel will carry out the provisions of an Emergency Preparedness Plan to prevent, detect, and address any accidents involving the release of hazardous material.

Transportation
California law governing the transportation of hazardous materials and waste is contained in Division 20, Chapter 6.5, Article 6 and Article 13 of the California Health and Safety Code (H&SC). Regulations implementing this statute are found in Title 22, Division 4.5, Chapter 13 of the California Code of Regulations (CCR). In addition, the California Vehicle Code, California Highway Patrol Regulations (13 CCR), and the California State Fire Marshal Regulations (19 CCR) also apply to the transportation of hazardous materials and waste.

The H&SC and its regulations require that a transporter of hazardous waste hold a valid registration issued by the DTSC, and liability insurance. A Uniform Hazardous Waste Manifest signed by the generator and transporter must be in the transporter's possession, and hazardous wastes can only be delivered to authorized facilities. If a release occurs during transportation, the transporter must take immediate action to protect human health and the environment. Vehicles and containers used to transport hazardous waste must be in sound condition and designed to contain hazardous waste. DTSC administers and insures compliance with the H&SC and its regulations that apply to transportation of hazardous materials and waste.

California Vehicle Code sections 31301-31309 control, among other things, the routes that vehicles use in transporting hazardous materials and wastes. The California Highway Patrol is responsible for enforcement of these sections of the Vehicle Code.

Offsite Release
There is the potential for a release to occur as a result of a truck accident. Most of the materials shipped from Romic during Phase 1 of facility closure would consist of decontamination wastewater, decontaminated equipment and scrap. Wastewater is usually shipped in 55-gallon drums or tankers. Scrap materials and decontaminated equipment would be transported via truck, typically contained in a crate.

Under existing procedures, a driver of any motor vehicle that transports hazardous materials must receive training that covers general awareness/familiarization with the duties, safety and function-specific aspects of the job, such as transport of hazardous waste. In addition, the driver must receive training on the safe operation of the motor vehicle that will be transporting hazardous materials (49 CFR 177.816) such as 24-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) training course that meets the requirement of 49 CFR Part 172 Subpart G. The training includes proper maintenance of shipping papers and manifests, labels, placards and markings required for shipping, pre-transportation packaging, loading, transporting, unloading, and how to respond in the event of a spill, leak or other emergency.

The drivers are also required to receive training in the applicable requirements of 49 CFR Parts 390 to 397 (Federal Motor Carrier Safety Regulations) and the procedures necessary for safe operation of the motor vehicle. Training includes:

- Pre-trip inspection
- Use of vehicle controls and equipment, including emergency equipment
- Maneuvering in tunnels, on bridges and at railroad crossings
- General operation of the vehicle (safe turning, backing, braking, parking)
- Requirements pertaining to attendance of vehicle, parking, smoking, routing, incident reporting
- Loading and unloading materials (includes compatibility and segregation of cargo in a mixed load, package handling and securing).

Onsite Release

There is the potential for accidental spill of the wastewater from decontamination process at the facility. However, there is no additional potential for the release of a chemical from an onsite storage tank as the entire inventory has been eliminated. Furthermore, the decontamination and deconstruction of all equipment will be done within secondary containment with berms that help prevent or contain spills.

The project Health and Safety manual must include a process hazard analyses, including safe operating procedures for handling the different types of materials and the decontamination and deconstruction processes to reduce the likelihood and/or severity of a hazard occurring during closure operations. Each unit at the facility will be evaluated for potential causes of upset conditions and all aspects of the decontamination and deconstruction processes will be reviewed to identify possible operational hazards. In addition to these measures to prevent onsite releases, all project activities would be conducted in compliance with emergency response protocols for promptly responding to a spill.

Fire or Explosion

Contractors must be trained in the identification of preventive measures to reduce the likelihood of fire or explosion such as HAZWOPER training. Heavy tools used by contractors must be non-sparking, and electric devices must be certified as intrinsically safe.

There is the potential for a fire or explosion. Potential ignition sources include sparking from metal-to-metal contact, sparking from electrical contacts, and high-temperature surfaces. Possible fuel sources for a fire/explosion include vapor pockets in and out of units. The project Health and Safety manual must include procedures to prevent and/or minimize the extent of a fire or explosion.

Release from Seismic Event

Romic has performed a seismic risk analysis of 111 tanks and 10 columns at the facility (Plecnik 2003). The analysis considered ground shaking, flooding, soil liquefaction, and soil settlement potential from a design earthquake as specified in the 1997 Uniform Building Code (UBC) and the International Building Code 2000 (IBC). The analysis concluded that the potential exists for a sufficiently strong earthquake to topple or rupture tanks and other containers at the Romic facility leading to on-site releases of hazardous waste/material.

Following the analysis for ground-shaking impacts from a seismic event, each of the 111 tanks and 10 columns was assigned to one four risk categories (A through D), ranging from “no risk” to “high risk,” respectively. Tanks and reboilers in risk categories A through C were determined not to have the potential to cause a significant impact to operator human life and health or the environment in the event of a substantial earthquake. While some release of hazardous

materials/waste could occur, the liquid would be captured in secondary containment. The tanks and reboilers in risk category D were identified as having the potential to result in a substantial release of hazardous material/waste (which would be captured by secondary containment) and cause a significant impact on operator human life and health in the event of a Level VIII or larger earthquake. Romic discontinued use of the tanks and reinforced the reboilers as of July 1, 2004, reducing the potential impact to human life and health, and the potential for an inadvertent release of hazardous material/waste to less than significant.

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 an existing or proposed school.

Impact Analysis:
The Romic Facility is not located within one-quarter mile of an existing or proposed school. Trucks carrying wastewater and decontaminated equipment will be leaving the Facility via Bay Road onto University Avenue and Highway 101 or Highway 84. The route to Highway 101 does not come within one-quarter mile of a school. The route via Highway 84 will pass within one-quarter mile of Costano Elementary School located approximately 600 feet east of University Avenue; however, the possibility of a release of hazardous materials or waste from a truck is considered unlikely because the equipment that cannot be decontaminated will be cut up and transported in secure crates under hazardous waste manifest. Furthermore, wastewater will be transported to a treatment facility in tanker trucks following all applicable DOT regulations.

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 Romic facility is not included on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (DTSC 2008).

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:
The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The proposed project area is located entirely within the existing Romic facility and will not place structures, vehicles, or other objects within the pathway or route of an adopted emergency response or evacuation plan.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

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

Impact Analysis:
The Romic facility is included within the airport land use plan for the Palo Alto Airport. It is outside the airport safety zone which is primarily for the safety of takeoffs and landings but is within the 355-foot height above ground level height restriction for structures (City of Palo Alto 1996). The takeoff flight path is designed so that aircraft departing the Palo Alto Airport do not pass over the Romic facility. Since the facility and proposed project are outside the airport safety zone and aircraft traffic does not pass over the facility and project, the project will result in a less than significant safety hazard for people residing or working in the project area and for persons in the surrounding area.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

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

Impact Analysis:
The proposed project site is not located in the vicinity of a private airstrip.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

8. Hydrology and Water Quality

Project Activities Likely to Create an Impact:
The project Site is in an industrial area and the proposed project will be located entirely within the existing Facility which consists of tanks, equipment, buildings, and paved surfaces. The project activity involves decontamination and deconstruction of all above ground equipment and structures within secondary containment with berms at the Site. These activities do not have the potential to impact hydrology or water quality in or near the Site.

Description of Baseline Environmental Conditions:
The Romic facility is located in the City of East Palo Alto, which is bounded on the east by San Francisco Bay and on the south by San Francisquito Creek. Saltwater marshes and wetlands lie directly east and north of the facility. A 130-acre former saltwater evaporation pond is present within the marshes and wetlands east of the facility, and is separated from the facility by a tidal slough (the "east unnamed slough") and a levee. Immediately north of the facility, another channel (the "north unnamed slough") drains into the eastern tidal slough (Conor Pacific 1999).

Regional Surface Water
Surface drainage in East Palo Alto gently slopes northward and eastward toward the San Francisco Bay. Engineered tidal sloughs that drain into the bay are situated to the east and north of the Romic facility. Surface runoff west of Pulgas Avenue from Runnymede Street to Bay Road is routed toward a slough that empties into the Bay, where it is discharged (City of East Palo Alto 1999).

The San Francisco Bay and Delta comprise the West Coast's largest estuary, encompassing approximately 1600 square miles of waterways and draining over 40 percent of the fresh water in California. In the estuary, the Sacramento and San Joaquin Rivers flow from Northern California's inland valleys into the delta before emptying into San Francisco Bay and the Pacific Ocean.

Across from the unnamed eastern slough and north of Cooley Landing is a 130-acre former saltwater evaporation pond. The pond is surrounded by levees and managed by the Mid-peninsula Regional Open Space District as part of the Ravenswood Open Space Preserve. The levee includes a bicycle and pedestrian trail.

San Francisquito Creek is the nearest natural drainage feature and is located approximately one mile south of the Romic facility. San Francisquito Creek is bounded by levees east of Highway 101 through Palo Alto Baylands Nature Preserve and drains into the bay (City of East Palo Alto 1999). Major stream channels are not located at or in the vicinity of the Romic facility.

Regional Groundwater
The City of East Palo Alto is located in the San Mateo County Groundwater Basin, which is part of the Santa Clara Valley Basin that encompasses 580 square miles and is drained by Redwood and San Francisquito Creeks. The mineral, chemical and physical constituents found in the basin's groundwater generally fall below the California Domestic Water Quality Maximum Contaminant Levels. In some cases, the quality of local groundwater is considered to be poor because of contaminants from local industries. Declining groundwater levels have been noted for aquifers within the City due to factors such as streambed pollution and channelization, increased water use and low rainfall levels (City of East Palo 1999).

The sediments of the Santa Clara Valley Basin consist of alluvial fan deposits, which are part of the Niles Cone and interfinger with fine-grained estuarine deposits of the San Francisco Bay. These estuarine deposits thicken toward the center of the bay. Thus, the thickness of the aquifers decreases westward toward the Romic facility, while the thickness of the aquitards increases (Conor Pacific 1999).

The uppermost 320 feet of alluvium is divided vertically into an upper and lower aquifer by a regionally extensive clay aquitard that is approximately 80 to 140 feet thick. The upper (shallow) aquifer correlates to the Newark aquifer of the Niles Cone, which is approximately 20 feet thick and occurs between depths of approximately 45 and 90 feet below ground surface (bgs). The shallow aquifer contains a high concentration of total dissolved solids (TDS) due to saltwater intrusion from the bay. Consequently, there are no operating wells in this aquifer, and the poor quality of the groundwater precludes its beneficial use as municipal, agricultural or domestic water (SF Bay Basin 1995).

The regional aquitard extends across the basin, thinning toward the mountain ranges on each side. Site studies indicate that this unit provides a relatively impermeable barrier between the shallow aquifer and the underlying lower (deeper) aquifer. The deeper aquifer below this extensive aquitard correlates to the Centerville aquifer, which occurs at depths of 140 to 320 feet bgs. Unlike the shallow aquifer, the western Centerville or deeper aquifer is not impacted by saline water, even though it has been used as a major source of domestic, irrigation and industrial water in this area for some time. The nearest well to the Romic facility that is installed in the deeper aquifer is the "Schoof" well at Cooley Landing, approximately 0.4 mile east of Romic (Conor Pacific 1999).

Site Surface Water

No natural lakes or other bodies of water are present on the project Site. The nearest surface water bodies are San Francisco Bay, an engineered unnamed tidal slough that borders the eastern side of the facility, and a flood control pond along the north property line. Two waste containment ponds were formerly located on the northern portion of the site, but were filled in and capped with concrete (Dames & Moore, 1989). The former pond area is the current location of the northern drum storage warehouses (see Figure 3).

The site has been graded for surface water drainage control and is surfaced with concrete or asphalt, except for the equipment storage yard and southern parking lot, which are surfaced with compacted gravel. The surface grading causes surface runoff from the southern and eastern portions of the site to flow northwest.

Storm water can be discharged from several points at the facility. Rainwater collected from the roofs of the North Drum Storage Building is discharged directly to the unnamed slough east of the facility and does not enter the ground at the site. Rainwater from the front entrance drive and the administrative building roof is discharged to Bay Road. This water does not come into contact with industrial activity at the site. Storm water runoff from the rest of the facility flows to a sump located in the east-central portion of the facility where it is pumped to tanks for treatment or discharge.

Periodic surface water sampling of the eastern slough has been conducted as part of site remediation feasibility investigations (RFIs) since 1990, and additional surface water samples were collected as part of an ecological assessment of the slough conducted in 1993 (JSA 1993). In 1994, low-level volatile organic compounds (VOCs) were reportedly detected in surface water

samples collected from the eastern slough (JSA 1995). Currently, surface water samples are analyzed quarterly for VOCs (Conor Pacific 1999).

According to the Federal Emergency Management Agency (FEMA), Romic is located in a 100-year floodplain, but is protected by an engineered levee on the east. The levee around the facility is reportedly two feet above the flood level for a 100-year storm. However, some portions of the facility would be inundated from a 100-year flood including the front driveway entrance to the facility.

Site Groundwater

At the site, a miscellaneous mixture of fill material overlies the discontinuous alluvial and estuarine sediments, which are primarily made up of silt and clay. These layers of silt and clay have low permeability, and water does not readily pass through them. Passing through the layers of silt and clay are deposits from river and stream channels composed of gravel, rock and sand. These channels have higher permeability, allowing easier passage of water. At the site, these deposits can be categorized into three discontinuous, water-bearing zones, called the A-, B- and C-zones. The zones are vertically separated by aquitards, or silt and clay layers, which are generally continuous in a horizontal plane and prevent water from passing from one zone to another. The three water-bearing zones are located from the surface to a depth of approximately 80 feet. At a depth of approximately 80 feet, a thick clay layer underlies the bottom, or C-zone. Below the thick clay layer is a fourth water-bearing zone, called the D-zone (Conor Pacific 1999).

A description of the fill and water-bearing zones at the facility is as follows, beginning with the ground surface to the deepest depth explored (Conor Pacific 1999):

- Fill beneath the pavement is 1 to 14 feet thick and at its deepest point is approximately 2 feet below mean sea level (msl). This deepest point is located in the former pond area between retraction well 12 (RW-12) on the west part of the site and RW-6 on the east part of the site.
- Groundwater is typically encountered within the fill, about 2 to 10 feet below ground surface (bgs) at elevations of 2 to 4 feet above msl.
- Contact between the fill material and the upper portion of the A-zone is often indistinguishable or gradational; thus, the lower saturated portion of the fill material is typically considered part of the A-zone.
- Water-bearing A-zone is 7 to 24 feet thick and extends to approximately 13 feet below msl.
- The aquitard underlying the A-zone and on top of the B-zone is 8 to 25 feet thick.
- The water-bearing B-zone is 3 to 24 feet thick and extends to a maximum depth of 25 feet below msl.
- The aquitard underlying the B-zone and on top of the C-zone is 9 to 24 feet thick.
- The water-bearing C-zone is 11 to 25 feet thick and extends to a maximum depth of 54 feet below msl.
- Underlying the C-zone is a thick clay layer that separates the C-zone from the fourth water-bearing D-zone. The clay layer is part of the thick, regionally continuous aquitard separating the shallow aquifer from the deep regional aquifer.

Groundwater is generally confined in the A through D zones, although the uppermost or A-zone appears unconfined in some areas. Water within these zones flows generally to the east at estimated velocities of 0.12, 0.022 and 0.01 feet per day (ft/day) for the A-, B- and C-zones, respectively (Conor Pacific 1999).

Hydraulic characteristics of the water-bearing zones can be summarized as follows (Conor Pacific 1999):

- The water-bearing A-zone is characterized by moderate transmissivities of approximately 60 to 2,900 gallons per day per foot (gpd/ft). The hydraulic conductivity of A-zone sediments ranges from 5×10^{-4} to 1×10^{-2} centimeters per second (cm/sec) (1 to 29 ft/day). There is generally a downward gradient between the A- and B-zones, ranging from 0.01 to 0.4 foot per foot (ft/ft).
- The water-bearing B-zone is characterized by transmissivities of approximately 45 to 4,880 gpd/ft; the hydraulic conductivity of B-zone sediments ranges from 3×10^{-4} to 4×10^{-3} cm/sec (0.8 to 10 ft/day). There is generally an upward gradient between the B- and C-zones, ranging from 0.4 to over 1 ft/ft, except at well pair RW-7B and RW-7C (see Figure3.4-3), where a slight downward gradient of 0.04 has been measured.
- The water-bearing C-zone is characterized by transmissivities of 50 to 350 gpd/ft, and the hydraulic conductivity of C-zone sediments ranges from 2×10^{-4} to 1×10^{-3} cm/sec (0.5 to 3 ft/day). However, limited testing has been conducted. There is typically an upward gradient between the C- and D-zones.

The D-zone is the deepest water-bearing zone investigated at the site. This zone is confined and is separated from the overlying C-zone by the regional aquitard. This aquitard is approximately 80 feet thick at this point. The horizontal groundwater gradient and flow direction have not been measured in this zone since well RW-16D is the only well installed in this unit (Conor Pacific 1999). During the RFIs, groundwater in the A- and B-zones was found to be impacted with VOCs. Romic implemented interim remedial actions to remove VOCs in the A-zone in May 1993 and in the B-zone in September 1998. Groundwater quality is monitored through a system of groundwater monitoring wells.

Site Ground Water Remediation Program

Prior to the adoption of the federal Resource Conservation and Recovery Act (RCRA) of 1976, hazardous wastes generated by operations at the site of the current Romic facility were disposed of in unlined surface impoundments on the property. Since then, hazardous wastes at Romic have been stored and treated onsite within secondary containment systems, and disposed of at approved offsite RCRA disposal facilities. The surface disposal in unlined surface impoundments contaminated the groundwater beneath the Romic facility. Groundwater remediation is currently ongoing at the facility.

Pursuant to its 1988 agreement with USEPA, Romic investigated shallow groundwater (less than 75 feet below ground surface) at the site and determined that it is contaminated with several types of chemicals. The primary contaminants in the groundwater are volatile organic compounds such as trichloroethene (TCE), vinyl chloride and others. Other types of chemicals detected in the groundwater include semi volatile compounds and metals. Polychlorinated biphenyl's (PCBs) have been detected in a few of the groundwater wells. Limited sampling indicates that the VOC-contaminated shallow groundwater has migrated toward the salt marsh located east of the facility and appears to be moving toward San Francisco Bay.

Since 1993, Romic has been pumping contaminated groundwater to the Facility's onsite wastewater plant and treating it to remove contaminants before discharging the treated water to the neighboring tidal slough, where it eventually flows to the Bay. Treatment is conducted under an EPA-administered RCRA Section 3008(h) Consent Order (No. 09880015). In addition, oversight is provided by the San Francisco Bay RWQCB and the State Water Resources Control Board (SWRCB).

Under EPA RCRA Consent Order #09880015, more than 3.5 million gallons of groundwater have been extracted and treated since 1993. Additional final remediation of these waters is being evaluated. A pilot study was conducted at the Romic facility to test an enhanced bioremediation technique using both cheese whey and molasses. The results of this study showed the use of this bio-treatment is more effective than the extraction and treatment system formerly used at the Facility. On February 23, 2004, the USEPA allowed shutdown of the extraction and treatment system and expansion of the in-situ biological treatment test system as the sole method of treating groundwater contamination at the facility.

Analysis as to whether or not project activities would:

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

Impact Analysis:
Romic has ceased operations and eliminated its inventory as stipulated in DTSC's Enforcement Order dated August 29, 2007 (DTSC 2007). The proposed project involves Site Closure activities including decontamination and deconstruction of all of the above ground hazardous waste processing equipment and structures. The proposed project activity will generate wastewater that will be tested before it is shipped offsite for treatment. Therefore there will be no impact on water quality with implementation of the proposed project.

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:
As mentioned in sections above, the proposed project only involves decontamination and deconstruction of the above ground equipment and structures. Therefore the supply of groundwater will not be impacted by implementation of the proposed Phase I Site Closure.

The existing groundwater remediation program is not part of the proposed project, and there will not be a change to this program related to implementation of the proposed project. Therefore, there will be no impact to the remediation program as a result of the proposed project.

Soil and groundwater contamination from past practices are identified separately in the facility's corrective action order issued pursuant to RCRA Section 3008(h) and are administered by the USEPA.

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, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site.

Impact Analysis:
No grading or substantial removal of soil will occur during the proposed project. Mostly, the concrete surfaces will be scarbed for sampling after decontamination. Only if the decontaminated concrete surfaces do not meet the Decontamination Performance Criteria per the approved Closure Plan, would they be removed and disposed offsite as hazardous waste. Therefore, the drainage pattern of the site or area will not be substantially altered and there will be a less than significant impact on erosion, siltation, or flooding, either onsite or offsite.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

d. 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 project is limited to D&D activities, with clean concrete surfaces to be left behind at the completion of the Phase I Site Closure. The quality of storm water discharged from the site will not be degraded as a result of this project. Therefore, the impact to storm water discharge from implementation of the proposed project will be less than significant.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

e. Otherwise substantially degrade water quality.

Impact Analysis:
All tanks and drums (potential contributors to water quality degradation) would be removed from the site with implementation of the proposed project.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

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

Impact Analysis:
The entire site is paved with concrete, except for the narrow strip of unpaved area along the perimeter and a gravel parking area near Bay Road Entrance. The elevation of the eastern portion of the Romic facility, including adjacent land that was purchased in 1983, the driveway

area and the neighboring property have been raised approximately two feet above the historical 100-year floodplain level. The structures in the processing area will be demolished and removed and the proposed project would place no new structures on the project site.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

g. 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:
In the unlikely event that the site was flooded, people at the site would be able to evacuate in time. According to the Seismic Risk Analysis performed for the site, extant site structures would not be significantly degraded even if the site was flooded to a depth of five feet (Plecnik 2003). There are no dams or levees in the vicinity of the site whose failure would expose people or structures to a significant risk of loss, injury or death. Therefore, the risk of loss, injury, or death to structures or people is less than significant.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

h. Inundation by seiche, tsunami or mudflow.

Impact Analysis:
As the Romic facility is located one-half mile west of San Francisco Bay, there is potential for it to be impacted by a tsunami generated by an earthquake near the facility. However, based on the small size of the tsunami recorded from the 1906 earthquake, the actual local tsunami hazard in the San Francisco Bay region is low because tsunami energy is attenuated during slow propagation through the shallow reaches of the Bay. There are no lakes or reservoirs near the site that could cause a seiche that would inundate the site. Mudflows are not probable given the flat terrain of the area and the extensive paving of the surface at the site and in the vicinity. In summary, the possibility of inundation of the project site by seiches, tsunamis or mudflows is less than significant.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

9. Land Use and Planning

Project Activities Likely to Create an Impact:
Implementation of the Site Closure Plan would not affect land use or planning. All project activities will take place on property located within an area zoned for both light and heavy industrial use that the City plans to retain as such (City of East Palo Alto 1999, 2000, 2002, 2003).

Description of Baseline Environmental Conditions:
East Palo Alto is comprised of ten neighborhoods that contain a variety of residential, commercial, agricultural, industrial, institutional and open space uses. The Bayshore Freeway (U.S. 101) and University Avenue are major surface transportation routes that cross East Palo Alto (see Figure 2).

The Romic facility is located on approximately 14 acres in the existing Ravenswood Industrial Area, in the City's northeast section, bounded by San Francisco Bay on the east. Nearby areas are mixed industrial, commercial and residential uses. No schools or day-care centers are within a one-quarter-mile radius, although several are within a one-mile radius. The nearest residence is approximately one-quarter-mile from the site, in an area of mixed industrial, commercial and residential land uses.

As designated in the existing Land Use Element of the East Palo Alto General Plan, the Ravenswood Industrial Area consists of approximately 130 acres and includes the Romic Facility. The Ravenswood Industrial Area has been variously used for agricultural, residential, commercial and industrial purposes since the 1940s. The United States Environmental Protection Agency (USEPA), City of East Palo Alto and San Francisco Bay Regional Water Quality Control Board have been investigating the Ravenswood Industrial Area as part of the USEPA Brownfields Initiative. Under the Brownfields Initiative, communities, regulatory agencies, property owners, developers and others are working together to redevelop industrial and commercial properties in previously developed, or "Brownfield," sites. The goal is to create new economic opportunities, increase property values, and revitalize neighborhoods (USEPA 1996). The Ravenswood Industrial Area is named a "National Brownfield Pilot Project" by the USEPA (USEPA 1997).

The irregularly shaped Romic property is bordered along its easterly boundary by an unnamed tidal slough and levee and the Ravenswood Open Space Preserve, and by a salvage yard near Bay Road. From north to south, the facility's westerly boundary is bordered by vacant land, a former salvage yard and Tara Street. From east to west, the southerly facility boundary is bordered by Bay Road, vacant land and an active salvage yard (see Figure 3). Adjacent and nearby properties are subject to deed restrictions related to residual petroleum hydrocarbons and inorganic compounds in the soil from previous uses at these sites.

In addition to its General Plan, the City of East Palo Alto has prepared a Preliminary Draft Revitalization Plan that includes the Ravenswood Business District (City of East Palo Alto 2000). . The City has prepared a Draft Environmental Impact Report (DEIR) to amend its current General Plan and Zoning Ordinance for the Ravenswood Business District in accordance with the Revitalization Plan (City of East Palo Alto 2003).

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 proposed project would not affect current or proposed zoning. The Facility is located within a designated industrial area of the new Ravenswood Business District. The proposed project is consistent with current zoning and the Zoning Ordinance Amendment for the Ravenswood Business District as currently proposed by the City (City of East Palo Alto 2003).

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:
The project site is currently developed and is not within an area included in any habitat conservation plan or natural community conservation plan. The project will not affect ongoing activities at the two nearby nature preserves, as project-related activities will occur only within existing Facility boundaries and the transportation corridors leading in and out of the Site.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

10. Mineral Resources

Project Activities Likely to Create an Impact:
Implementation of the Site Closure Plan would not affect mineral resources. All proposed activities would be restricted to aboveground features on the 14-acre industrial Site and the transportation corridors leading in and out of the Site.

Description of Baseline Environmental Conditions:
As noted in subsection 6: Geology and Soils, the natural soils in the project area are predominantly sandy or clayey silt, porous and permeable, and/or alluvial fan or interfluvial basins. The California Geological Survey has mapped the Ravenswood Business District as "MRZ-1," i.e. an area where no significant mineral or aggregate deposits are present (DOC 2008).

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:
   The proposed project activities are restricted to cleanup and removal of contaminated above-ground structures and equipment on an industrial site and no subsurface work is proposed. The project will therefore have no impact on any mineral resources that may be present on the site or its vicinity.

   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.

See response in subsection 10(a), above. No impact.

11. Noise

Project Activities Likely to Create an Impact:

- Use of heavy equipment for disassembly, loading and hauling of decontaminated equipment
- Transportation of wastewater and disassembled equipment to an approved receiving facility

Description of Baseline Environmental Conditions:
Community noise levels are measured in terms of the "A-weighted decibel," or dBA. The A-weighting correlates overall sound pressure levels with the frequency response of the human ear. Several rating scales have been developed for measurement of community noise to account for: (1) parameters of noise that have been shown to affect humans, (2) the variety of noises found in the environment, (3) variations in noise levels that occur as a person moves through the environment and (4) variations associated with the time of day. The predominant community rating scale used in California to assess land use compatibility is the Community Noise Equivalent Level, or CNEL. The City of East Palo Alto regulates noise using the CNEL.

The CNEL scale represents a time-weighted 24-hour average noise level based on dBA. Time-weighted refers to the fact that noise levels during certain hours of the day are adjusted for people's increased sensitivity to noise during those hours. Five decibels (dB) are added to a noise level during the evening hours (7 p.m. to 10 p.m.), and 10 dB are added to the nighttime hours (10 p.m. to 7 a.m.). The day-night, or L_{dn}, scale is similar to the CNEL scale except that evening hour readings are not adjusted. A CNEL noise level may be reported as a "CNEL of 60 dBA," "60 dBA CNL," or simply "60 CNL."

Noise-Sensitive Land Uses
The area immediately surrounding the Romic facility generally is comprised of land uses that are not considered noise-sensitive. Land uses to the north and east are mostly open space. Land uses to the south and west are generally heavy and light industry. The area is also approximately one mile north of the Palo Alto Airport, and frequent air traffic is a contributor to the local noise environment.

The noise-sensitive receptors nearest the Romic facility include a drug and alcohol rehabilitation center and a residential area. The rehabilitation center, Day Top Village, is located on Pulgas Avenue, approximately one-tenth of a mile west of Romic. The residential area is located approximately four-tenths of a mile to the northwest. In addition, cyclists, hikers and bird watchers utilize the Ravenswood Preserve bike path along the levee on the eastern side of the Romic facility.

Noise Monitoring
A noise monitoring program was conducted on February 2, 2001, at locations along the Romic Facility property line and at the above-mentioned sensitive receptors. Noise level measurements were conducted over a 30-minute period at these locations. Note that the level of operations at the Romic Facility in early 2001 was near full capacity while currently the facility is closed.

A Bruel & Kjaer Model 2236 precision integrating sound level meter with an integral data logger was utilized for the monitoring program. The meter meets American National Standards Institute (ANSI) S1.4-1983 requirements for precision Type 1 sound level meters. The meter was calibrated before and after the survey period using a Bruel & Kjaer Model 4231 sound level calibrator. The microphone was fitted with a windscreen to reduce wind-generated noise and was mounted approximately five feet above the ground.

Local Noise Levels

Noise at the Romic property line monitoring locations was dominated by facility noise and frequent aircraft traffic. At the residential locations, noise levels were dominated primarily by aircraft and vehicular traffic. Vehicular traffic at Bay Road and Pulgas Avenue did not appear to be the result of deliveries to Romic. Most of the traffic at this location appeared to be personal vehicle traffic. Noise from the Romic facility was not audible at any of the residential monitoring locations.

Romic Facility property line L_{90} noise levels were highest at locations R1 and R2 (64 to 67 dBA). They were lowest at the front gate R3 location (51 dBA). Noise levels were relatively steady at all three locations. Most noises associated with elevated levels were the result of aircraft traffic. Much lower noise levels were measured at the residential locations (R4 and R5). Noise along the bike path on the eastern edge of the facility would be approximately the same as the noise level measured at the northeast property line, that is, at R1 or 64 dBA.

The City of East Palo Alto has also taken 24-hour noise readings near the Romic facility as part of an Environmental Impact Report prepared for amendments to its General Plan and zoning ordinance (City of East Palo Alto 2003). Noise readings were taken over a 24-hour period. The City of East Palo Alto noise readings are compatible with the noise readings obtained for the Romic facility. Reading R4 at the intersection of Illinois Street and Stevens Avenue has a CNEL of 52 dBA and is located approximately 1,000 feet north of the City's Location 2 at the end of Demeter Street that has a reading of 58 dBA. Reading R5 located approximately 1,000 feet southeast of Location 2, has a CNEL of 54 dBA. Reading R6, located at the intersection of Bay Road and Pulgas Avenue has a CNEL of 63, and Location 1 at the intersection of Pulgas Avenue and Weeks Street has a CNEL of 62.5. These two locations are approximately 10 dBA higher than R4, R5, and Location 2 and the reason is probably due to the greater vehicle traffic at the Pulgas Avenue intersections.

Compliance with Noise Standards

The CNEL levels for the Romic noise data were calculated to evaluate the existing measured noise levels against the East Palo Alto standard and Land Use Compatibility matrix. Calculation of an accurate CNEL normally requires 24 hours of data. However, it is possible to conservatively estimate the CNEL by using the level measured during the 30-minute monitoring and by assuming that this level remains constant during all hours of the day and night. Since monitoring was conducted during the day, when activity is highest, assuming that noise levels remain the same during other hours, including the late night hours, provides a conservative measure of noise.

The calculated CNEL for the Romic Facility reveal that, at the residential locations (R4, R5, R6), existing CNEL levels are below the East Palo Alto exterior noise standard of 65 dBA. This includes location R6, where heavy vehicular traffic resulted in higher noise levels than at the other residential locations. Further, the data reveal that the R4 and R5 locations have estimated CNEL levels that fall into the "clearly compatible" range for new residential development (52 and 54 dBA, respectively). Location R6, at 63 dBA CNEL, would be considered "conditionally acceptable" for new residential construction. The noise level along the bike path, which is located approximately 100 feet from the Romic northeast property line was not specifically measured but would probably be slightly less than the noise level measured at the northeast property line (R1).

<u>Analysis as to whether or not project activities would</u>:

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:
Activities associated with the proposed project essentially will be pressure washing, followed by deconstruction and/or cutting up of decontaminated equipment and associated noise from vehicle traffic to and from the facility. The number of trucks picking up solid waste and waste water could increase by 2-3 trucks per day. Arrival and departure of these additional trucks would be spread out over the workday and would add an insignificant, additional amount of noise. Employee vehicle traffic is expected to total approximately 30 vehicles per day. While these vehicles would add a small amount of noise, the increase would probably not be discernible.

An analysis of traffic noise was performed by the City of East Palo Alto to estimate the impact on noise levels with development of the Ravenswood Business District which includes the Romic facility. The analysis showed that about 12,800 vehicle trips would be added each weekday. This large increase in traffic caused the peak hour noise levels to increase by only 1-2 dBA (City of East Palo Alto, 2003). In addition, any added noise would be indiscernible at residential and other sensitive sites such as R4 and R5 since these areas are located far from the vehicle commute route along University Avenue and Bay Road. Therefore, any small increases in noise from increased vehicle traffic would not result in noise levels in excess of City standards and would therefore not be significant.

Noise from onsite activities of the proposed project would periodically increase with the D&D activities. Typical noise levels for the kinds of equipment that may be used onsite are shown in Tables 4a/b. Existing noise levels are within standards established for an industrial setting, and the proposed project would remain within those standards.

The proposed project will involve decontamination and deconstruction of onsite equipment and structures, activities that will result in a temporary increase in noise levels at the site. The decontamination/deconstruction period is expected to occur over a period of 12 months. During this time, onsite activities will include decontamination and deconstruction of existing tanks, equipment and structures; and sealing concrete or removing of concrete cover. The noise levels will occur on and off over the 12-month period and at various locations on the Romic site depending on where the decontamination/deconstruction is planned. The noise levels shown in Tables 4a/b are measured at a distance of 50-200 feet from the construction equipment. In some cases, the noise levels will be reduced from the levels shown in Tables 4a/b before reaching the Romic facility property line. In other cases, depending on the location of the construction, the noise levels at the property line will be at or near the levels shown in Tables 4a/b. Deconstruction noise from the site will have decreased substantially by the time it reaches sensitive receptor sites such as noise monitoring locations R4 and R5. Based on the *Industrial Noise Manual* (AIHA, 1975), the following equation represents the change in sound level with distance from the sound source:

$$L_{pr} = L_{ps} - 20[\text{Log } r - 0.5]$$

Where:

L_{pr} = Resultant average sound level at the receptor;
L_{ps} = Average sound level at the source; and
r = Distance in feet from the source to the receptor.

The distance from the western boundary of the Romic facility to the Daytop Village Rehabilitation Center (R5) is approximately 500 feet. Using a construction noise/sound level of 89 dBA at the western boundary, the noise level would reduce to approximately 45 dBA at the Daytop Village Rehabilitation Center. The distance to the intersection of Stevens Avenue and Illinois Street is

approximately 2,000 feet. Again, assuming a deconstruction noise/sound level of 89 dBA at the western boundary, the noise level would reduce to approximately 33 dBA at the intersection which is in a residential area.

These maximum noise levels would be intermittent during the day and over the 12-month period. These noise levels are within standards established by the City of East Palo Alto, so the impact from deconstruction activities would be less than significant.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

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

Impact Analysis:
The proposed project is not expected to generate any groundborne noise or vibration. Project activities that will occur during the 12-month period include, removal of tanks, equipment and other structures, and sealing of concrete areas. Ground vibration is expected to be minimal to none. Based on the surrounding vacant and/or industrial land uses, any periodic occurrence of groundborne noise or vibration would be less than significant.

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 increased amount of employee and truck vehicle traffic to the project site may result in a small increase in the ambient noise level. However, this increase will probably not be discernable to the average person and will therefore have a less than significant impact on the ambient noise level.

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:
Closure activities of proposed project will result in periodic noise from deconstruction of equipment over the estimated 12-month period. However, this noise should occur only on weekdays, between 7:00 a.m. and 6:00 p.m.; would be reduced substantially by the time it reaches off-site

receptors; and will be within the standards established by the City of East Palo Alto 2002,2003). Therefore the temporary and periodic increase in noise level from the project will have a less than significant impact on ambient noise levels.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

12. Population and Housing

Project Activities Likely to Create an Impact:
Implementation of the Site Closure Plan will not entail construction of new housing or demolition of existing housing.

Description of Baseline Environmental Conditions:
During the proposed Phase I Site Closure, an average of 30 workers are expected to be onsite over an approximate 12-month period. All workers are expected to be drawn from the large metropolitan area surrounding the project site or commute to the site from outside the metropolitan area. As a result, no additional demand will be placed on housing, schools or other community resources associated with population growth (DTSC 2004).

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

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

Impact Analysis:
Phase I of the Romic Facility Closure is expected to be completed within 12 months, requiring an average of 30 site workers for approximately 50 weeks. Site workers are not expected to relocate to the area due to this project. Any site workers from outside the area are likely to reside in motels or hotels in the East Palo Alto vicinity during the course of the proposed project. In addition, the proposed project would neither construct nor demolish any housing or affect the housing needs in the local community.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

13. Public Services

Project Activities Likely to Create an Impact:
The proposed project is limited to Phase I Site Closure activities within the Romic Treatment, Storage and Disposal Facility. No public schools, parks, or governmental facilities are present within the affected project area, and no increase in public safety services would be required during, or as a result of, project implementation.

Description of Baseline Environmental Conditions:

Fire Protection
The Menlo Park Fire Protection District (MPFPD) provides fire protection to the City of East Palo Alto and the project site. The MPFPD operates seven fire stations and provides fire protection and emergency medical services to the cities of Atherton, Menlo Park, East Palo Alto and some unincorporated areas of San Mateo County. Station No. 2 of the MPFPD is located at 2290 University Avenue in East Palo Alto, approximately 0.8 road miles from the project site. This station is equipped with one new Pierce Saber fire engine and staffed with three firefighters per shift. The next nearest station is Fire Station #77 at 1467 Chilco Avenue in the City of Menlo Park, about 2.5 road miles from the project site. The main station of the MPFPD is located at 300 Middlefield Road in Menlo Park about 3.5 road miles from the project site. The MPFPD also has a mutual aid agreement with the City of Palo Alto Fire Protection District for support in the event of an incident at Romic.

The response time for the engine and crew of Station No. 2 to arrive at the Romic facility is less than five minutes. The Chilco Avenue station has three fire fighters and one fire engine. The station's response time is within five minutes. Three fire fighting vehicles are located at the Middlefield Station (Station No. 1). Truck 1 is a combination ladder truck and fire engine staffed by a Captain and three firefighters; a Captain and two firefighters staff Engine 1; and Rescue 1 is a specialized vehicle that carries the Jaws of Life and other special rescue equipment. Response time from the Middlefield station to the Romic facility is within seven minutes (MPFPD 2008).

The Menlo Park Fire District main office in Menlo Park also provides fire prevention services. The San Mateo County Health Department's Environmental Health Office and the Office of Emergency Services, due to a mutual aid agreement with the MPFPD (MPFPD 2008), provide hazardous incident support to the site.

Emergency medical aid is provided by the MPFPD and private ambulance companies in San Mateo County. One of the three fire fighters on each fire engine is a trained paramedic, and the Middlefield station has an additional contract ambulance with two paramedics (MPFPD 2008).

Police Protection
The East Palo Alto Police Department (EPAPD) provides police protection to the City of East Palo Alto including the Romic facility. The EPAPD has one station, at 2415 University Avenue where University intersects Bay Road. The EPAPD has approximately 47 police officers and the police officer/resident ratio in the City is approximately 1.6 officers per 1,000 residents (City of East Palo Alto 2003).

Other law enforcement entities in the area are the California Highway Patrol which patrols Highways 101 and 84, and the San Mateo County Sheriff's Office, based in Redwood City, which has a contract with the EPAPD.

The Romic Facility is surrounded by an 8-foot chain-link fence and block wall topped with three strands of barbed wire, and there are 12 controlled access points to prevent unauthorized personnel from entering the active portion of the facility. The Site is monitored by security personnel 24 hours per day, 7 days per week (Romic 1997).

Emergency Medical Response

Medical facilities are available at Stanford University Hospital and Sequoia Hospital, both within 15 minutes of the project site. Stanford University Hospital is located at 300 Pasteur Drive in Palo Alto, approximately 3.5 miles from the Romic facility. Sequoia Hospital is located at 170 Alameda in Redwood City, approximately 7 miles from Romic.

Schools, Parks, Other Public Facilities

The City of East Palo Alto has three parks that include Jack Farrell Park, Bell Street Park, and Martin Luther King Jr. Park. The closest park to the Romic facility is Jack Farrell Park, located about three-tenths of a mile west. This park covers 3.5 acres and contains a baseball field, basketball courts, picnic areas, a tot playground, and open space for various field sports. Bell Street Park is 5-acres in size and is located about one-mile south/southwest of the facility. Martin Luther King Jr. Park is 5.5 acres in size and is located approximately one-mile southeast of the facility (City of East Palo Alto 2003 and AAA 2002).

The Romic Facility is located in the Ravenswood City School District and the Sequoia Union High School District. The Ravenswood City School District serves the city of East Palo Alto and operates 14 schools including a preschool and one charter high school with a population of approximately 5,000. No existing or projected capacity shortages have been reported for this school district. The Sequoia Union High School District operates four high schools in Redwood City, Atherton, Belmont, and Woodside. Three of the high schools, Atherton, Belmont, and Woodside, are open to students from East Palo Alto. Some of these schools are nearing or at full capacity.

<u>Analysis as to whether or not project activities would</u>:

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:
   No increased demand for schools, parks, or additional governmental facilities would result from implementation of Phase I of the proposed Closure Plan. Should project activities result in an emergency, public services such as the fire department, emergency medical services, or local law enforcements may be dispatched to the Site; however, given the small number of site workers (30 or fewer) and the inclusion of an emergency response plan in the site-specific Health and Safety Manual, the D&D activities would have negligible or no effect on the public services and facilities serving East Palo Alto.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

14. Recreation

Project Activities Likely to Create an Impact:
Implementation of the Site Closure Plan would not increase the use of existing recreational facilities or create a need for additional recreational facilities for the community.

Description of Baseline Environmental Conditions:
Two open space reserves are located east of the Romic Facility to the north and to the south. The Ravenswood Open Space Preserve is located primarily within the City of Menlo Park, north of Cooley's Landing. Cooley's Landing is a peninsula of ecological open space designated for future recreation activities. South of Cooley's Landing; the Palo Alto Baylands Nature Preserve dominates the frontage of San Francisco Bay. These areas provide limited access for hiking, bird watching, nature study and cycling on established trails.

To the east of the Facility is a saltwater evaporation pond. The pond is managed by the Mid-peninsula Open Space District as part of the Ravenswood Preserve. A levee that forms the western boundary of the Ravenswood Preserve runs along the tidal slough adjacent to the east of the Romic facility, west of the saltwater evaporation pond, and is used as a bicycle path. Hikers and bird watchers also use the levee for recreation.

The City has four parks. The nearest, Jack Farrell Park, is located approximately three tenths of a mile west of the project Site.

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:
   The project also will not affect access to or use of the adjacent levee or bike path. Therefore, the proposed project will not affect nearby recreational land uses. The future recreational use of Cooley's Landing, or the City's existing park, will not be impaired by the proposed project.

   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:
   The proposed project is limited to Site Closure activities with not construction or expansion of public recreational facilities. No impact.

   ☐ Potentially Significant Impact
   ☐ Potentially Significant Unless Mitigated
   ☐ Less Than Significant Impact
   ☒ No Impact

15. Transportation and Traffic

Project Activities Likely to Create an Impact:
The proposed project is expected to involve transportation activities as listed below that are associated with short-term deconstruction related-activities during peak traffic hours.

- Approximately 30 employee vehicles per day routinely
- 2 to 6 trucks weekly used in transport of the decontaminated equipment
- 1 or 2 tanker trucks weekly for transporting waste water offsite

Description of Baseline Environmental Conditions:

Regional Transportation Network
The City of East Palo Alto is served by an established transportation system, with vehicular access provided by the Bayshore Freeway (U.S. Highway 101) and State Route 84. A rail line extends through the northerly portion of the City to the East Bay and northward through San Mateo County. San Francisco International Airport is located approximately 18 miles to the north. Palo Alto Airport, a general aviation facility, is located in Santa Clara County, approximately one-quarter mile south of the East Palo Alto boundary and San Mateo County line. Bus service is available throughout the City of East Palo Alto and the surrounding vicinity (City of East Palo Alto 2003).

Project Area Roadways
The Bayshore Freeway (U.S. Highway 101) is an eight-lane roadway that provides regional north-south access to the city of East Palo Alto. It extends northward toward San Francisco and southward toward San Jose.

University Avenue is a four-lane arterial that runs north and south through East Palo Alto. University Avenue has signalized intersections at Donohoe Street, Bell Street, Runnymede Street, Bay Road, Notre Dame Avenue, Michigan Avenue, O'Brien Drive, and Purdue Avenue.

Bay Road is a collector street that provides east-west access through East Palo Alto between Willow Road and Cooley Landing, an identified historical site on San Francisco Bay.

The Bayshore Freeway (U.S. 101), Bayshore Road, University Avenue and Bay Road east of University Avenue are designated truck routes that provide access to the Romic facility, as shown on Figure 2. The portion of Bay Road associated with the truck route is a four-lane street that reduces to two lanes at Pulgas Avenue. The Bay Road truck route begins at the intersection of Bay Road and University Avenue and extends eastward, where it ends at Cooley Landing. Intersections along Bay Road east of its intersection with University Avenue are not signalized.

The capacity and efficiency of a roadway is determined primarily by the number of travel lanes and the operation of intersections along the roadway. Level of Service (LOS) is a grading system that compares the capacity of a roadway with the average daily traffic (ADT) that occurs on the roadway or more importantly, the traffic that occurs during peak traffic flow. Peak traffic flow usually occurs during weekday commute periods. Peak traffic flow periods for the City of East Palo Alto and associated freeways are 7-9:00 a.m. and 4-6:00 p.m.

An LOS of "A" indicates traffic flow with few or no delays, and LOS "F" indicates substantially reduced speeds and stoppage of traffic along the roadways. The measurement of LOS at intersections is similar to that for roadways but instead of comparing capacity with the actual flow of traffic, the time

delay for each vehicle at the intersection is the determining factor of LOS. In the 1999 Countywide Transportation Plan, the stretch of the Bayshore Freeway near East Palo Alto is classified as a Highly Congested Roadway, with an existing and projected Level of Service (LOS) F during peak traffic periods. The City of East Palo Alto has defined the limit of acceptable operations as LOS D for both roadways and intersections.

Existing Traffic

Vehicle access to the project Site following truck routes designated during operation of the Romic TS&D Facility is as follows:

- Traveling northwest on the Bayshore Freeway (U.S. 101): Take University Avenue Exit to Donohoe Street, west on Donohoe, then north on University Avenue to Bay Road and east on Bay Road to the project site.

- Traveling southeast on the Bayshore Freeway (U.S. 101): Take the University Avenue Exit, then north on University Avenue to Bay Road and east on Bay Road to the project site.

- Traveling southwest on the Bayshore Expressway (SR-84): Take the University Avenue exit, then south on University to Bay Road, and east on Bay Road to the project site.

- Traveling northeast on the Bayshore Expressway (SR-84): Take the University Avenue exit, then south on University to Bay Road, and east on Bay Road to the project site.

No traffic signals, stacking lanes or other traffic control devices are present relative to site access, as general traffic use on the roadway is light. Bay Road dead-ends just beyond the Romic facility entrance. The nearest through street is Pulgas Avenue, approximately one-half mile west of the Facility. There are no through streets east of the intersection of Bay Road and Pulgas.

U.S. 101 during the morning peak period of 7:00-9:00 has a LOS of F. SR-84 also has a LOS of F for traffic coming from the northeast into the Palo Alto area during the morning peak period and to the northeast when leaving the Palo Alto area during the afternoon peak period. For other directions and times (except for the a.m. southeast bound high occupancy vehicle (HOV) lane on U.S. 101), the freeways serving the project site have a LOS of D or better.

The intersections encountered along the route to the project site are also key in determining the existing condition of traffic. The following intersections lie along the routes to the project site:

Traveling northwest on U.S. 101:
U.S. 101 Northwest bound Off-Ramp-Capitol Avenue/Donohoe Street
University Avenue/Donohoe Street
University Avenue/Bell Street
University Avenue/Runnymede Street
University Avenue/Bay Road

Traveling southeast on U.S. 101:

University Avenue/U.S. 101 Southeast bound Off-Ramp
University Avenue/Donohoe Street
University Avenue/Bell Street
University Avenue/Runnymede Street
University Avenue/Bay Road

Traveling southwest and northeast on S.R. 84 (Bayfront Expressway):

S.R. 84 (Bayfront Expressway) and University Avenue
University Avenue/Purdue Avenue
University Avenue/O'Brien Drive
University Avenue/Notre Dame Avenue
University Avenue/Michigan Avenue
University Avenue/Bay Road

During the morning peak traffic period (7:00-9:00), the University Avenue/Donohoe Street intersection has a LOS of E. This is below the minimum LOS of D set by the City of East Palo Alto. Vehicles accessing the project Site off of U.S. 101 will encounter this intersection and experience delays approaching one minute. Approaching the project site off S.R. 84 in the morning peak period, vehicles will also encounter delays close to one minute (LOS F) at the University Avenue/Purdue Avenue intersection that is controlled by a two-way stop sign. All other intersections that would be encountered in the morning peak period are at LOS D or better.

During the afternoon peak period (4:00-6:00 p.m.) the U.S. 101 offramps and all intersections encountered on the route to the project Site from U.S. 101have a LOS of D or better. From S.R. 84 and south on University Avenue in the peak afternoon period, three intersections encountered have a LOS of F. These are S.R. 84/University Avenue, University Avenue/Purdue Avenue, and University Avenue/Michigan Avenue. All other intersections encountered are LOS D or better. A vehicle entering (or leaving) the project site in the afternoon peak period via Bay Road, University Avenue and S.R. 84, would encounter considerable delay. The delay would continue on S.R. 84 if the direction were northeast bound since the LOS rating on this roadway during the afternoon peak period is also F.

Existing Parking Capacity
Existing, designated parking at the Romic Facility can accommodate approximately 40 trucks, 110 employee vehicles, and 9 visitor vehicles. These designated parking places do not include the open space gravel parking area near the entrance to the facility. This area could accommodate another 40-50 vehicles.

Self-Imposed Traffic Restriction
In response to a request from the community, project-related truck traffic will not be scheduled between the hours of 7:00 and 9:00 a.m. or between the hours of 3:00 and 4:00 p.m.

<u>Analysis as to whether or not project activities would</u>:

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:

   Proposed Facility Truck Trips
   The number of trucks leaving the site with decontaminated equipment and waste generated by closure activities is expected to remain at approximately 6 to 8 trucks per week, and occasionally a truck on the weekend. However, this is a decrease from 12 trucks per day during normal operations of the facility. For the purposes of this analysis, arrivals and departures are assumed

to occur generally during peak commute hours. Trucks will actually arrive and depart at various times during the day, both during peak and non-peak hours.

Proposed Facility Employee Vehicle Trips
The number of employee vehicles arriving and departing the facility on a daily basis over the two work shifts as a result of project implementation is expected to be 30 employee vehicles. This equates to 150 daily vehicles trips that occur during the work week.

During the weekend, the number of employee vehicles arriving and departing the facility is expected to be at 8 employee vehicles. This equates to 16 daily vehicle trips that occur over the weekend.

Summary Analysis
The proposed project is expected to generate up to 6 to 8 weekly truck trips associated with transportation of decontaminated equipment and waste generated by closure activities for the period of 12 months during peak traffic hours. All other truck and employee related daily trips are expected to occur during non-peak hours and on weekends.

The increase in traffic during peak hours is not considered substantial in relation to the existing traffic load and capacity of the street system on U.S. 101 during the peak morning period, and on State Route 84 for southwest bound traffic in the morning and northeast bound traffic in the afternoon.

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:
The temporary addition of 6-8 trucks weekly over a 12-month period would not affect the existing or Level of Service of F on U.S. 101 during the peak morning period, and the LOS of F on State Route 84 for southwest bound traffic in the morning and northeast bound traffic in the afternoon.

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:
The proposed project is limited to the decontamination and removal of all above-ground treatment equipment and structures and has no elements that would affect the design of transportation routes or intersections. The transport trucks will continue to use designated truck routes and comply with U.S. Department of Transportation regulations. Romic will continue to assure that

any trucks transporting waste from the facility will use hazardous waste manifests, U.S. Department of Transportation regulation placards and that drivers are properly trained in the transportation of hazardous waste.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

d. Result in inadequate emergency access.

Impact Analysis:
Romic will notify the first responders with schedules and the type of response that might be required and the potential hazards that may be encountered during a response. The Menlo Park Fire Protection District is the primary first responder for onsite emergencies and would be assisted by a San Mateo County Hazardous Materials Response Team as required. Offsite responders are contacted by dialing 911 or in the case of a fire automatically or manually by various alarms. Offsite responders would access the site through the main entrance (South Gate # 2) or through the gates off Tara Road (Gates 6-9) if necessary (see Figures 2 and 3). The decontamination and removal of tanks and equipment will not affect these existing access routes for offsite entities responding to an onsite emergency.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

e. Result in inadequate parking capacity.

Impact Analysis:
Existing, designated parking at the Romic facility can accommodate approximately 40 trucks, 110 employee vehicles, and 9 visitor vehicles. These designated parking places do not include the open space gravel parking area near the entrance to the facility that could accommodate another 40-50 vehicles. The onsite parking capacity will therefore be able to accommodate any project-related parking requirement without modification.

No parking is provided outside the facility on Bay Road. The proposed project will not create a need for such parking. Therefore, the project will not affect parking capacity outside the facility.

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:
Project-related traffic would be almost exclusively limited to trucks, mobile equipment, and personal vehicles. Other forms of transportation (rail or air traffic) and public transit facilities such as bus turnouts would not be affected by the proposed Site Closure activities.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

16. Utilities and Service Systems

Project Activities Likely to Create an Impact:

- Wet in-place decontamination of equipment prior to its removal from the site.
- Temporary sealing of stormwater collection basins for use as collection sumps.
- Disposal of non-hazardous waste at municipal sanitary landfill.

Description of Baseline Environmental Conditions:

Water Supply

The East Palo Alto County Waterworks District (EPAWD) owns the water distribution system in the City of East Palo Alto and until July of 2001 supplied water service to the Romic facility and surrounding areas of the City of East Palo Alto. In July 2002, the EPAWD entered into a 25-year lease agreement with the California-American Water Company (CalAm) whereby CalAm operates, maintains, and provides billing service for the water system. CalAm obtains most of its supply from the San Francisco Water Department's (SFWD) Hetch-Hetchy Aqueduct, which passes through the City, and distributes water through underground cast iron main pipelines. During Facility operations, Romic required approximately 35,000 gallons per day, distributed via a piping system that supplies site buildings for domestic use and fire protection.

Sewage and Wastewater Disposal

The East Palo Alto Sanitary District (EPASD) is the primary provider of sanitary sewer services for the City and is the provider for the Romic facility. The EPASD has a 2.7 million gallons per day (mgd) capacity entitlement agreement with the Palo Alto Regional Water Quality Control Plant. Currently, EPASD is using approximately 1.7 mgd of its 2.7 mgd capacity entitlement (City of East Palo Alto 2003). During Facility operations, Romic discharged an annual average of 375,000 gallons per month to the EPASD, from restrooms, laboratories and other facilities, and wastewater from onsite processing and captured storm flows. Some of these waters were treated onsite before being discharged under an Industrial Waste Discharge Permit.

Electric Power

Electric power is supplied to the Romic facility by Pacific Gas & Electric (PG&E) via an existing distribution line.

Natural Gas

Natural gas (primarily used as fuel for two steam boilers) was supplied to the Romic Facility during TS&D operations by PG&E.

Telephone and Communication

Telephone service is provided to the Romic Facility by SBC Communications. Onsite internal communication is provided via two-way radio and/or signal horns. External communications are provided by an auto-dialer system for emergency support personnel (Romic 1997).

Waste Disposal

In East Palo Alto, municipal solid waste is collected by BFI Peninsula and transported to the South Bayside Transfer Station and then to the Ox Mountain Sanitary Landfill located three miles east of Half Moon Bay for final disposal. As of the year 2000, the Ox Mountain Sanitary Landfill's remaining permitted capacity was estimated to be approximately 44 million cubic yards and the landfill was not expected to reach capacity until 2020 (City of East Palo Alto 2003).

Analysis as to whether or not project activities would:

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

Impact Analysis:
Wastewater from the Romic Facility is discharged under permit to the EPASD. The wastewater must meet requirements set by the EPASD and the water discharged by the EPASD must meet water quality standards set by the Regional Water Quality Board. Therefore, wastewater discharged from the Romic facility and from the proposed project will not exceed the wastewater standards and treatment requirements of the Regional Water Quality Board.

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:
Wastewater generated by the planned wet decontamination of waste treatment equipment would be collected along with captured stormwater and treated prior to any on-site or off-site discharge. There would be no significant increase in the quantity of domestic or industrial wastewater discharged from the facility to EPASD as a result of the proposed project.

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:
Storm water potentially contacting hazardous materials does not flow off the Romic site. Precipitation is captured onsite, where it flows to an underground collection system. The water is sampled and, if necessary, treated in the facility wastewater treatment system. It then is discharged to the EPASD. The project will have no permanent effect on the storm water collection and treatment system and will not require new storm water drainage facilities or expansion of existing facilities. Therefore, there will no significant impact on existing local or regional storm water drainage systems from implementation of the proposed project.

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:
During operation of the Transfer, Storage and Disposal Facility, water was used in hazardous waste treatment processes and provided for employee consumption. The proposed project could result in the temporary employment of approximately 30 individuals, and water would be used in the proposed decontamination activities; however, water use on the Site would not increase above the current permitted level of 154,512 gallons of liquid per day. No significant impact on water use is anticipated and no new or expanded entitlements would be necessary

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 project's projected demand in addition to the provider's existing commitments.

Impact Analysis:
The quantity of wastewater discharged from the facility during implementation of the proposed project will not increase significantly from current levels. Therefore it is not necessary for the wastewater treatment provider to determine that it has adequate capacity to serve the proposed project.

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 project's solid waste disposal needs.

Impact Analysis:
During operation of the Romic Facility approximately 30 cubic yards of municipal solid waste were generated and disposed per month. During the proposed Closure Plan's D&D activities, a maximum of 50 cubic yards of construction and demolition waste consisting of removed components and discarded temporary bracing would be generated. In addition, footing work for foundations would generate a maximum of 25 tons of concrete and soil waste. The construction waste would be taken to the Ox Mountain Sanitary Landfill, that has a remaining capacity of 44 million cubic yards. This relatively small quantity of construction waste would have a less than significant impact on the Ox Mountain Sanitary Landfill's capability to receive waste.

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:
All waste generated by the proposed activities under the Closure Plan would be transported for appropriate treatment or disposal to properly designated facilities and/or landfills, and therefore the Site Closure Romic would be in conducted in compliance with all federal, state, and local statutes and regulations related to solid waste.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ 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:

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.

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		Date
Suhasini Patel	Hazardous Substances Scientist	916.255.6428
Preparer's Name	Preparer's Title	Phone #
Branch or Unit Chief Signature		Date
Rizgar Ghazi	Standardized Permitting and Corrective Action Branch	916.255.6665
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ATTACHMENT A

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ATTACHMENT B

ABBREVIATIONS AND ACRONYMS

AA	Administering Agency
AAA	American Automobile Association
ADT	Average daily traffic
AIHA	American Industrial Hygiene Association
AFFF	Aqueous Film Forming Foam
ALUC	Airport Land Use Commission
ANSI	American National Standards Institute
APN	Assessor's Parcel Number
AST	Above ground storage tank
BAAQMD	Bay Area Air Quality Management District
BCDC	Bay Conservation and Development Commission
bgs	Below ground surface
CalAm	California-American Water Company
Caltrans	California Department of Transportation
CCR	California Code of Regulations
CDFG	California Department of Fish and Game
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CGS	California Geological Survey
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
cm/sec	Centimeters per seconds
CO	Carbon monoxide
COC	Chemicals of concern
CRT	Cathode Ray Tubes

dB	decibel (sound level measure)
dBA	A-weighted sound level
D&D	Decontamination, Deconstruction and Disposal
DHS	California Department of Health Services
DOC	California Department of Conservation
DTSC	Department of Toxic Substances Control
ECD	Electron Capture Detector
EIR	Environmental Impact Report
ELCD	Electrolytic Conductivity Detector
EPAPD	East Palo Alto Police Department
EPASD	East Palo Alto Sanitary District
EPAWD	East Palo Alto County Waterworks District
EPCRA	Emergency Planning and Community Right-To-Know Act
ERA	Ecological Risk Assessment
ERPG-3	Emergency Response Planning Guidelines Level 3
FCS	Federal Candidate species
FESA	Federal Endangered Species Act
FEMA	Federal Emergency Management Agency
FID	Flame Ionization Detector
ft/day	Feet per day
H&SC	California Health and Safety Code
HAZWOPER	Hazardous Waste Operations and Emergency Response
HDPE	High density polyethylene
HF-P	High Frequency Pulsed
HHRA	Human Health Risk Assessment
HMMP	Hazardous materials management plan
hp	Horse power
HTU	High Temperature Unit
HWCL	California Hazardous Waste Control Law
HWMU	Hazardous Waste Management Unit

IBC	International Building Code
IDLH	Immediately Dangerous to Life and Health
kVA	Kilovolt-Ampere
kW	kilowatt
lbs/day	Pounds per day
L_{10}	Noise levels equaled or exceeded, 10 percent of a stated time
L_{90}	Noise levels equaled or exceeded, 90 percent of a stated time
L_{dn}	Noise levels day-night scale
L_{eq}	Equivalent noise level
LEL	Lower Explosive Limit
LEPC	Local emergency planning committee
LIQ	Liquid
LOS	Level of Service
M-1	Light industrial zone
M-2	Heavy industrial zone
MEI	Maximum Exposed Individual
MGD	Million gallons per day
MPFPD	Menlo Park Fire Protection District
MSDS	Material Safety Data Sheets
msl	mean sea level
NIOSH	National Institute of Occupational Safety and Health
NOD	Notice of Deficiency
NOI	Notice of Intent
NO_x	Nitrogen monoxide
NPDES	National Pollutant Discharge Elimination System
ORT	Old Rain Tank
PCBs	Polychlorinated biphenyls
PG&E	Pacific Gas and Electric
pH	potential of hydrogen, measure of the acidity or alkalinity of solution
PHA	Process Hazard Analyses

PM_{10}	Airborne Particulate Matter, 10 micrometers in size or smaller
PPE	Personal Protect Equipment
ppm	Parts per million
PRC	Public Resources Code
psi	Pounds per square inch
PSM	Process Safety Management
RBD	Ravenswood Business District
RCC	Caustic Reboiler
RCRA	Resource Conservation and Recovery Act
Reb	Reboiler
RFI	Remediation Feasibility Investigation
ROG	Reactive organic gases
ROMIC	Romic Environmental Technologies Corporation
RQ	Regulated Quantity
RWQCB	San Francisco Bay Regional Water Quality Control Board
SARA	Superfund Amendments and Reauthorization Act
SERC	State Emergency Response Committee
SFWD	San Francisco Water Department
SPCAB	Standardized Permitting and Corrective Actions Branch
SPCC	Spill Prevention Control and Countermeasures Plan
SSC	Species of Special Concern
SSK	Stainless Steel Kettle
SWRCB	State Water Resources Control Board
SWPPP	Stormwater Pollution Prevention Plan
SR	State Route (Highway)
TCD	Thermal Conductivity Detector
TCE	Trichloroethene
TDS	Total dissolved solids
TID	Thermionic Detector
TSD	Treatment Storage and Disposal

TW	Truck Wash
UBC	Uniform Building Code
UFC	Uniform Fire Code
USC	United States Code
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Services
USGS	United States Geological Survey
YUCA	Youth United for Community Action
VC	California Vehicle Code
VOCs	Volatile Organic Compounds
WWT	Waste Water Treatment

ATTACHMENT C

TABLES

Table 1: **Onsite Units Proposed for Decontamination, Demolition and Removal**

Table 2: **Ambient Air Quality Standards**

Table 3a/b: **Noise**

TABLE 1

Equipment ID	Location	Unit #	Dimensions/Volume	Material of Construction
TANKS				
Tank 1	Tank Farm A	8	4,200 gal	Stainless steel
Tank 2	Tank Farm A	8	5,093 gal	Stainless steel
Tank 3	Tank Farm A	8	5,093 gal	Stainless steel
Tank 4	Tank Farm A	8	4,555 gal	Carbon steel
Tank 5	Tank Farm A	8	6,360 gal	Stainless steel
Tank 6	Tank Farm A	8	5,093 gal	Stainless steel
Tank 7	Tank Farm A	8	5,093 gal	Stainless steel
Tank 8	Tank Farm A	8	4,555 gal	Carbon steel
Tank 9	Tank Farm A	8	6,360 gal	Stainless steel
Tank 10	Tank Farm A	8	5,093 gal	Stainless steel
Tank 11	Tank Farm A	8	5,093 gal	Stainless steel
Tank 12	Tank Farm A	8	4,555 gal	Carbon steel
Tank K	Tank Farm A	8	9,230 gal	Carbon steel
Tank L	Tank Farm A	8	9,230 gal	Carbon steel
Tank M	Tank Farm A	8	9,230 gal	Carbon steel
Tank R-91	Tank Farm B	9	4,743 gal	Carbon steel
Tank R-92	Tank Farm B	9	4,743 gal	Carbon steel
Tank R-93	Tank Farm B	9	4,743 gal	Carbon steel
Tank R-94	Tank Farm B	9	4,743 gal	Carbon steel
Tank R-95	Tank Farm B	9	4,743 gal	Carbon steel
Tank 44	Tank Farm L	10	8,800 gal	Stainless steel
Tank 45	Tank Farm L	10	8,800 gal	Stainless steel
Tank 46	Tank Farm L	10	8,800 gal	Stainless steel
Tank 47	Tank Farm L	10	8,800 gal	Stainless steel
Tank 48	Tank Farm L	10	4,000 gal	Stainless steel
Tank 49	Tank Farm L	10	4,000 gal	Stainless steel
Tank 50	Tank Farm L	10	4,000 gal	Stainless steel
Tank 26	Tank Farm H	14	8,800 gal	Stainless steel
Tank 27	Tank Farm H	14	7,138 gal	Stainless steel
Tank 28	Tank Farm H	14	8,800 gal	Stainless steel
Tank 29	Tank Farm H	14	8,800 gal	Stainless steel
Tank 30	Tank Farm H	14	8,800 gal	Stainless steel
Tank 31	Tank Farm H	14	8,800 gal	Stainless steel
Tank 83	Tank Farm I	15	11,655 gal	Carbon steel
Tank 84	Tank Farm I	15	11,655 gal	Carbon steel
Tank 85	Tank Farm I	15	11,655 gal	Carbon steel
Tank 101	Tank Farm I	15	11,655 gal	Carbon steel
Tank 102	Tank Farm I	15	11,655 gal	Carbon steel
Tank 103	Tank Farm I	15	11,655 gal	Carbon steel
Tank 104	Tank Farm I	15	11,655 gal	Carbon steel
Tank 32	Tank Farm MNO	16	8,800 gal	Stainless steel
Tank 33	Tank Farm MNO	16	8,800 gal	Stainless steel
Tank 34	Tank Farm MNO	16	8,800 gal	Stainless steel
Tank 35	Tank Farm MNO	16	8,800 gal	Stainless steel
Tank 36	Tank Farm MNO	16	8,800 gal	Stainless steel
Tank 37	Tank Farm MNO	16	8,800 gal	Stainless steel
Tank 38	Tank Farm MNO	16	8,800 gal	Stainless steel
Tank 39	Tank Farm MNO	16	8,800 gal	Stainless steel
Tank 40	Tank Farm MNO	16	8,800 gal	Stainless steel
Tank 41	Tank Farm MNO	16	8,800 gal	Stainless steel

Equipment ID	Location	Unit #	Dimensions/Volume	Material of Construction
Tank 42	Tank Farm MNO	16	8,800 gal	Stainless steel
Tank 43	Tank Farm MNO	16	8,800 gal	Stainless steel
Tank AES-1	Tank Farm Q	17	11,160 gal	Stainless steel
Tank AES-2	Tank Farm Q	17	11,160 gal	Stainless steel
Tank AES-3	Tank Farm Q	17	11,160 gal	Stainless steel
Tank AES-4	Tank Farm Q	17	11,160 gal	Stainless steel
Tank 61	Tank Farm Q	17	13,113 gal	Stainless steel
Tank 64	Tank Farm Q	17	19,400 gal	Carbon steel
Tank 65	Tank Farm Q	17	19,400 gal	Carbon steel
Tank 71	Tank Farm Q	17	28,000 gal	Carbon steel
Tank 75	Tank Farm Q	17	12,700 gal	Stainless steel
Caustic Reboiler (RCC)	Production Area	27	2,160 gal	Monel
Stainless Kettle (SSK)	Production Area	27	1,618 gal	Stainless steel
Water Wash Tank (WWT)	Production Area	27	3,305 gal	Carbon steel
37" Reboiler (Reb-37)	Tank Farm G	13	6,100 gal	Stainless steel
49" Reboiler (Reb-49)	Tank Farm G	13	15792 gal	Stainless steel
35" Reboiler (Reb-35)	Tank Farm I	15	4,670 gal	Stainless steel
36" Reboiler (Reb-36)	Tank Farm I	15	7,500 gal	Stainless steel
42" Reboiler (Reb-42)	Tank Farm I	15	9.400 gal	Stainless steel
43" Reboiler (Reb-43)	Tank Farm I	15	6,996 gal	Stainless steel
48" Reboiler (Reb-48)	Tank Farm I	15	9.300 gal	Carbon steel
Tank 24	Tank Farm R	10	3,400 gal	Carbon steel
Tank 25	Tank Farm R	10	3,400 gal	Carbon steel
Vacuum Pot 24 (V-24)	Production Area	24	1,525 gal	Carbon steel
Vacuum Pot 25 (V-25)	Production Area	24	2,234 gal	Carbon steel
PT-1	Liquefaction	28	1,160 gal	Carbon steel
HTU	Boiler Area	25	1,127 gal	Carbon steel
HTU-1	Boiler Area	25	474 gal	Carbon steel
HTU-2	Boiler Area	25	330 gal	Carbon steel
TW-1	Truck Wash	34	1,700 gal	HDPE
T-13	Bio System	18	25,000 gal	Carbon steel
B-2	Bio System	18	25,000 gal	Carbon steel
B-3	Bio System	18	25,000 gal	Carbon steel
B-3A	Bio System	18	25,000 gal	Carbon steel
B-4	Bio System	18	16,000 gal	Carbon steel
B-4A	Bio System	18	16,000 gal	Carbon steel
B-5	Bio System	18	5,000 gal	Carbon steel
B-6	Bio System	18	5,000 gal	Carbon steel
B-6A	Bio System	18	5,000 gal	Carbon steel
B-7	Bio System	18	5,000 gal	Carbon steel
B-8	Bio System	18	375 gal	Stainless steel
R96	Tank Farm D	n/a	11,750 gal	Carbon steel
R97	Tank Farm D	n/a	11,750 gal	Carbon steel
NT-1	Tank Farm J	19	580 gal	Rubber lined CS
NT-2	Tank Farm J	19	580 gal	Rubber lined CS
NT-3	Tank Farm J	19	580 gal	Rubber lined CS
Tank 16	Tank Farm G	13	1,962 gal	Stainless steel
Tank 17	Tank Farm G	13	1,962 gal	Stainless steel
Tank 18	Tank Farm G	13	535 gal	Stainless steel
Tank 19	Tank Farm G	13	1,962 gal	Stainless steel
Tank 20	Tank Farm G	13	1,962 gal	Stainless steel
Tank 21	Tank Farm G	13	1,895 gal	Carbon steel

Equipment ID	Location	Unit #	Dimensions/Volume	Material of Construction
Tank 25	Tank Farm Q	17	4,600 gal	Carbon steel
Tank 60	Tank Farm Q	17	13,000 gal	Carbon steel
Tank 62	Tank Farm Q	17	13,600 gal	Carbon steel
Tank 63	Tank Farm Q	17	20,000 gal	Carbon steel
Tank 66	Tank Farm Q	17	24,823 gal	Carbon steel
Tank 67	Tank Farm Q	17	20,616 gal	Carbon steel
Tank 68	Tank Farm Q	17	30,000 gal	Carbon steel
Tank 69	Tank Farm Q	17	24,823 gal	Carbon steel
Tank 70	Tank Farm Q	17	126,904 gal	Carbon steel
Tank 72	Tank Farm Q	17	2,000 gal	Carbon steel
Tank 73	Tank Farm Q	17	11,990 gal	Carbon steel
Tank 74	Tank Farm Q	17	11,990 gal	Carbon steel
Tank 76	Tank Farm Q	17	27,637 gal	Carbon steel
Tank 77	Tank Farm Q	17	27,088 gal	Carbon steel
PROCESS EQUIPMENT				
Sand Filter SF-1	Bio System	18	475 gal	Fiberglass Reinforced Plastic
Sand Filter SF-2	Bio System	18	475 gal	Fiberglass Reinforced Plastic
Carbon Bed	Bio System	18	414 gal	Carbon steel
Ion Exchange Bed(s)	Bio System	18	640 gal	Carbon steel
Trojan UV System	Bio System	18	-	Stainless steel
distillation column 24 inch	Production Area	23	350 gal	Stainless steel
distillation column 32 inch	Production Area	23	630 gal	Stainless steel
distillation column 35 inch	Production Area	23	790 gal	Stainless steel
distillation column 36 inch	Production Area	23	790 gal	Stainless steel
distillation column 37 inch	Production Area	23	790 gal	Stainless steel
distillation column 42 inch	Production Area	23	1060 gal	Stainless steel
distillation column 43 inch	Production Area	23	1060 gal	Stainless steel
distillation column 48 inch	Production Area	23	1400 gal	Stainless steel
distillation column 49 inch	Production Area	23	1400 gal	Stainless steel
24" Reboiler (Reb-24)	Production Area	23	830 gal	Carbon steel
32" Reboiler (Reb-32)	Production Area	23	3,647 gal	Stainless steel
Caustic column	Production Area	23 &27	NA	Stainless steel
thin film evaporator #1	Production Area	26	NA	Stainless steel
thin film evaporator #2	Production Area	26	NA	Stainless steel
thin film evaporator #3	Production Area	26	NA	Stainless steel
Debris Shredder	Liquefaction	31	200 cu ft	Steel
tanker washing unit	Truck Wash Station	34	NA	Steel
Non-contained Concrete Pads	Facility	34, 35, 36, 37	NA	Concrete
CONTAINMENT UNITS				
Tank Farm A	Tank Farm A	8	60.8' l x 42.6' w x 2.3' d	Concrete
Tank Farm B	Tank Farm B	9	60.8' l x 14.7' w x 2.4' d	Concrete
Tank Farm C	Tank Farm C	10	30' l x 27.5' w x 2.2' d	Concrete
Tank Farm D	Tank Farm D	11	26.7' l x 26.7 w x 2.6 d	Concrete

Equipment ID	Location	Unit #	Dimensions/Volume	Material of Construction
Tank Farm G	Tank Farm G	13	39.5' l x 19.5' w x 1.4' d	Concrete
Tank Farm H	Tank Farm H	14	40' l x 24.6' w x 3.3' d	Concrete
Tank Farm I	Tank Farm I	15	94' l x 39' w x 1.2' d	Concrete
Tank Farm J	Tank Farm J	19	18.4' l x 8.5' w x 1.3' d	Treated Concrete
Tank Farm K	Tank Farm K	18	92.2' l x 45.4' w x 2.8' d	Concrete
Tank Farm L	Tank Farm L	10	39.5' l x 29.8' w x 2.8' d	Concrete
Tank Farm MNO	Tank Farm MNO	16	86.4' l x 24.6' w x 2' d	Concrete
Tank Farm Q	Tank Farm Q	17	126' l x 74' w x 2.6' d	Treated Concrete
Tank Farm R	Tank Farm R	10	30' l x 13.8' w x 2.2' d	Concrete
Production Area	Production Area	23	5,250 sq ft	Concrete
South Drum Storage Building	South Storage	2	173' l x 69.5' w x 0.6' d	Treated Concrete
North Drum Storage Building	North Storage	1	99' l x 49' w x 0.6' d	Treated Concrete
West Drum Storage Building # 1	West Storage #1	4	58' l x 29.3' w x 0.64' d	Treated Concrete
West Drum Storage Building # 2	West Storage #2	5	123' l x 64' w x 0.69' d	Treated Concrete
Sampling Area	Sampling Area	3	125' l x 74' w x 0.6' d	Treated Concrete
Truck Wash Area	Truck Wash Area	34	73' l x 27' w	Treated Concrete
Lab Pack Consolidation	West Storage #2	29	125' x 65' x 8"	Treated Concrete
FORMER PERMITTED UNITS SINCE CLOSED				
Tank A	Tank Farm C		5,800 gal	Carbon steel
Tank B	Tank Farm C		5,800 gal	Carbon steel
Tank C	Tank Farm C		5,800 gal	Carbon steel
Tank D	Tank Farm C		5,800 gal	Carbon steel
Tank E	Tank Farm C		5,800 gal	Carbon steel
Tank F	Tank Farm C		5,800 gal	Carbon steel
Tank G	Tank Farm C		5,800 gal	Carbon steel
Tank H	Tank Farm C		5,800 gal	Carbon steel
Tank I	Tank Farm C		5,600 gal	Carbon steel
Tank J	Tank Farm C		5,600 gal	Carbon steel
PERMITTED PLANNED UNITS NEVER CONSTRUCTED				
Tank 78	Tank Farm S		NA	
Tank 79	Tank Farm S		NA	
Tank 80	Tank Farm S		NA	
Tank 81	Tank Farm I		3,000 gal	Carbon steel
Tank 82	Tank Farm S		NA	
Tank 86	Tank Farm I		1,500 gal	Carbon steel
Tank 87	Tank Farm I		200 gal	Carbon steel
Tank 88	Production Area		1,500 gal	Carbon steel
Tank 89	Production Area		200 gal	Carbon steel
Tank 106	Tank Farm T		NA	
Tank 107	Tank Farm T		NA	
Tank 108	Tank Farm T		NA	
Tank 109	Tank Farm T		NA	
Tank A-6	Tank Farm E		6,000 gal	Carbon steel
Tank A-7	Tank Farm E		6,000 gal	Carbon steel
Tank 90	Tank Farm E		6,000 gal	Carbon steel
Tank N	Tank Farm E		8,000 gal	Carbon steel
Tank O	Tank Farm E		8,000 gal	Carbon steel
Tank R-96	Tank Farm D		6,000 gal	Carbon steel

Equipment ID	Location	Unit #	Dimensions/Volume	Material of Construction
Tank R-97	Tank Farm D		6,000 gal	Carbon steel
Tank A-1	Tank Farm F		2,000 gal	Polyethylene
Tank A-2	Tank Farm F		2,000 gal	Polyethylene
Tank A-3	Tank Farm F		2,000 gal	Polyethylene
Tank A-4	Tank Farm F		2,000 gal	Polyethylene
Tank A-5	Tank Farm F		2,000 gal	Polyethylene
Thin Film Evaporator #4	Production Area		150 gal	Stainless steel
Distillation Column 34"	Production Area		790 gal	Stainless steel
34" Reboiler (Reb-34)	Production Area		16500 gal	Stainless steel
Refrigerant Distillation	Tank Farm F		NA	
Reverse Osmosis	Tank Farm I		800 gal	
Ion Exchange Bed	Tank Farm F		300 gal	
Regeneration Unit	Tank Farm F		300 gal	
Electrode position Unit	Tank Farm F		600 gal	
Oil Filter	Tank Farm I		440 gal	Carbon steel
Consolidation Unit		30	NA	
Portable Aerosol Depressurization		32	NA	

NOTES:

gal = gallons
NA = Not available
l = length
w = width
d = depth
cu ft = cubic feet
sq ft = square feet

Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards [1]		Federal Standards [2]		
		Concentration [3]	Method [4]	Primary [3,5]	Secondary [3,6]	Method [7]
Ozone (O_3)	1 Hour	0.09 ppm (180 µg/m^3)	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m^3)		0.075 ppm (147 µg/m^3)		
Respirable Particulate Matter (PM10)	24 Hour	50 µg/m^3	Gravimetric or Beta Attenuation	150 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m^3		—		
Fine Particulate Matter (PM2.5)	24 Hour	No Separate State Standard		35 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m^3	Gravimetric or Beta Attenuation	15 µg/m^3		
Carbon Monoxide (CO)	8 Hour	9.0 ppm (10mg/m^3)	Non-Dispersive Infrared Photometry (NDIR)	9 ppm (10 mg/m^3)	None	Non-Dispersive Infrared Photometry (NDIR)
	1 Hour	20 ppm (23 mg/m^3)		35 ppm (40 mg/m^3)		
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m^3)		—	—	—
Nitrogen Dioxide (NO_2)	Annual Arithmetic Mean	0.030 ppm (57 µg/m3)	Gas Phase Chemiluminescence	0.053 ppm (100 µg/m^3)	Same as Primary Standard	Gas Phase Chemiluminescence
	1 Hour	0.18 ppm (339 µg/m^3)		—		
Sulfur Dioxide (SO_2)	Annual Arithmetic Mean	—	Ultraviolet Fluorescence	0.030 ppm (80 µg/m^3)	—	Spectrophotometry (Pararosaniline Method)
	24 Hour	0.04 ppm (105 µg/m^3)		0.14 ppm (365 µg/m^3)	—	
	3 Hour	—		—	0.5 ppm (1300 µg/m^3)	
	1 Hour	0.25 ppm (655 µg/m^3)		—	—	—
Lead[8]	30 Day Average	1.5 µg/m^3	Atomic Absorption	—	—	—
	Calendar Quarter	—		1.5 µg/m^3	Same as Primary Standard	High Volume Sampler and Atomic Absorption
Visibility Reducing Particles	8 Hour	Extinction coefficient of 0.23 per kilometer — visibility of ten miles or more (0.07 — 30 miles or more for Lake Tahoe) due to particles when relative humidity is less than 70 percent. Method: Beta Attenuation and Transmittance through Filter Tape.		No Federal Standards		
Sulfates	24 Hour	25 µg/m^3	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m^3)	Ultraviolet Fluorescence			
Vinyl Chloride[8]	24 Hour	0.01 ppm (26 µg/m^3)	Gas Chromatography			

See footnotes on next page ...

Table 2

1. California standards for ozone, carbon monoxide (except Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, suspended particulate matter—PM10, PM2.5, and visibility reducing particles, are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

2. National standards (other than ozone, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest eight hour concentration in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24 hour standard is attained when the expected number of days per calender year with a 24-hour average concentration above 150 $\mu g/m^3$ is equal to or less than one. For PM2.5, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact U.S. EPA for further clarification and current federal policies.

3. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

4. Any equivalent procedure which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.

5. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

6. National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

7. Reference method as described by the EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the EPA.

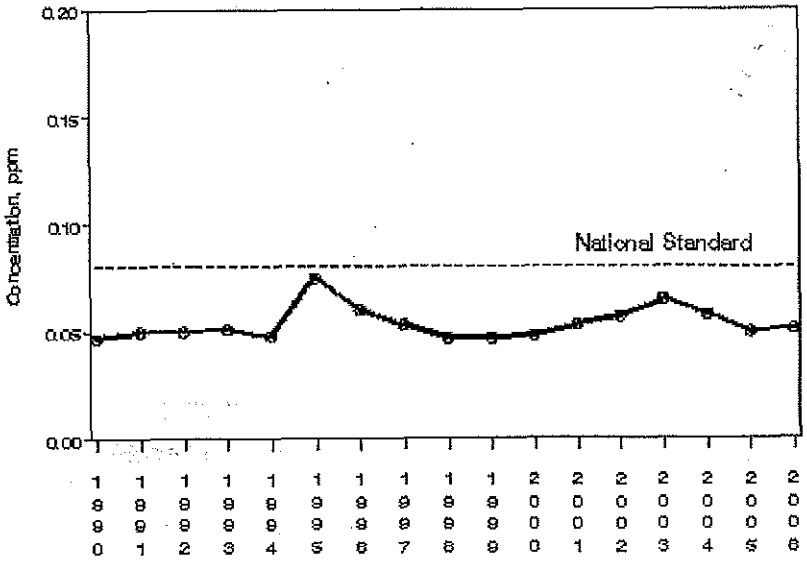
8. The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

Ozone Air Quality, 1990 — 2006

(Based on Annual 4th Maximum 8—Hour Average)

San Francisco, CA

SITE= 060811001 POC= 1



NAAQS for Ozone = 0.075 ppm (8 Hours) and 0.12 ppm (1 Hour)

CAAQS for Ozone = 0.07 ppm (8 Hours) and 0.09 ppm (1 Hour)

Notes:

ppm = parts per million
CAAQS = California Ambient Air Quality Standard
NAAQS = National Ambient Air Quality Standard

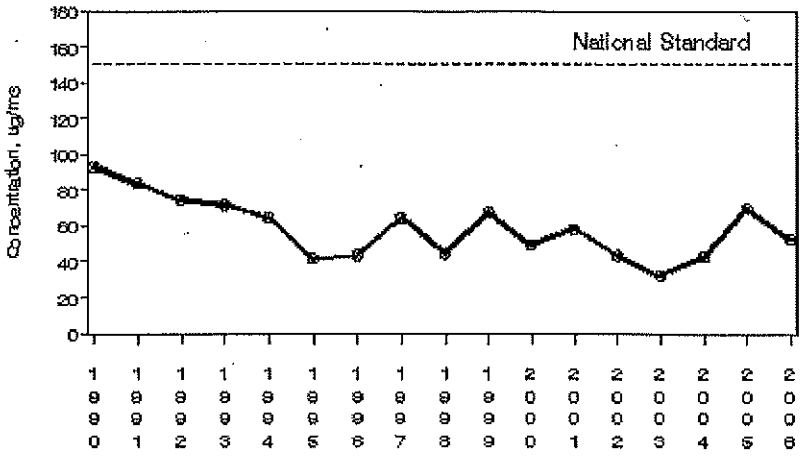
Source: http://www.epa.gov/air/airtrends/where.html

PM10 Air Quality, 1990 — 2006

(Based on Annual 2nd Maximum 24—Hour Average)

San Francisco,CA

SITE= 060811001 POC= 1



NAAQS for PM_{10} = 150 $\mu g/m^3$ (24 Hours)

CAAQS for PM_{10} = 50 $\mu g/m^3$ (24 Hours)

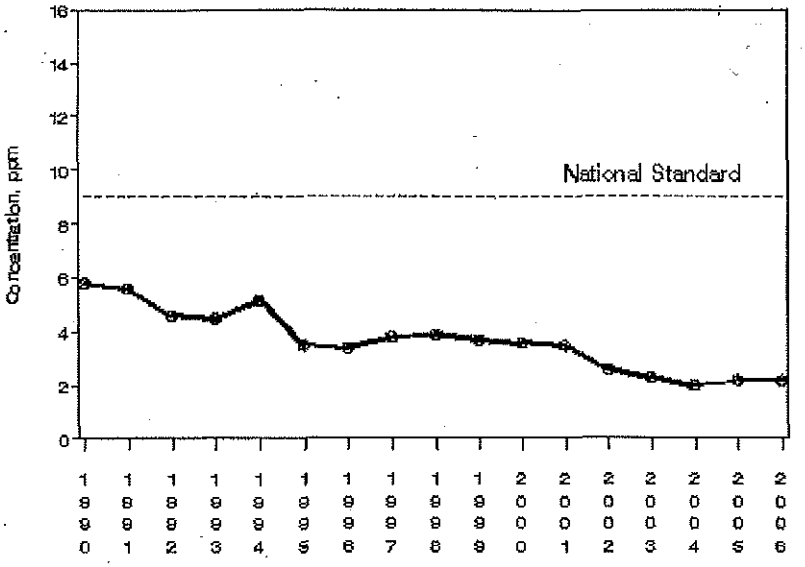
Notes:

$\mu g/m^3$	= micrograms per cubic meter
PM_{10}	= Airborne Particulate Matter, 10 micrometers in size or smaller
CAAQS	= California Ambient Air Quality Standard
NAAQS	= National Ambient Air Quality Standard

Source: http://www.epa.gov/air/airtrends/where.html

CO Air Quality, 1990 – 2006

(Based on Annual 2nd Maximum 8—hour Average)
San Francisco,CA
SITE= 060811001 POC= 1



NAAQS for CO = 9 ppm (8 Hours) and 35 ppm (1 Hour)

CAAQS for CO = 9 ppm (8 Hours) and 20 ppm (1 Hour)

Notes:

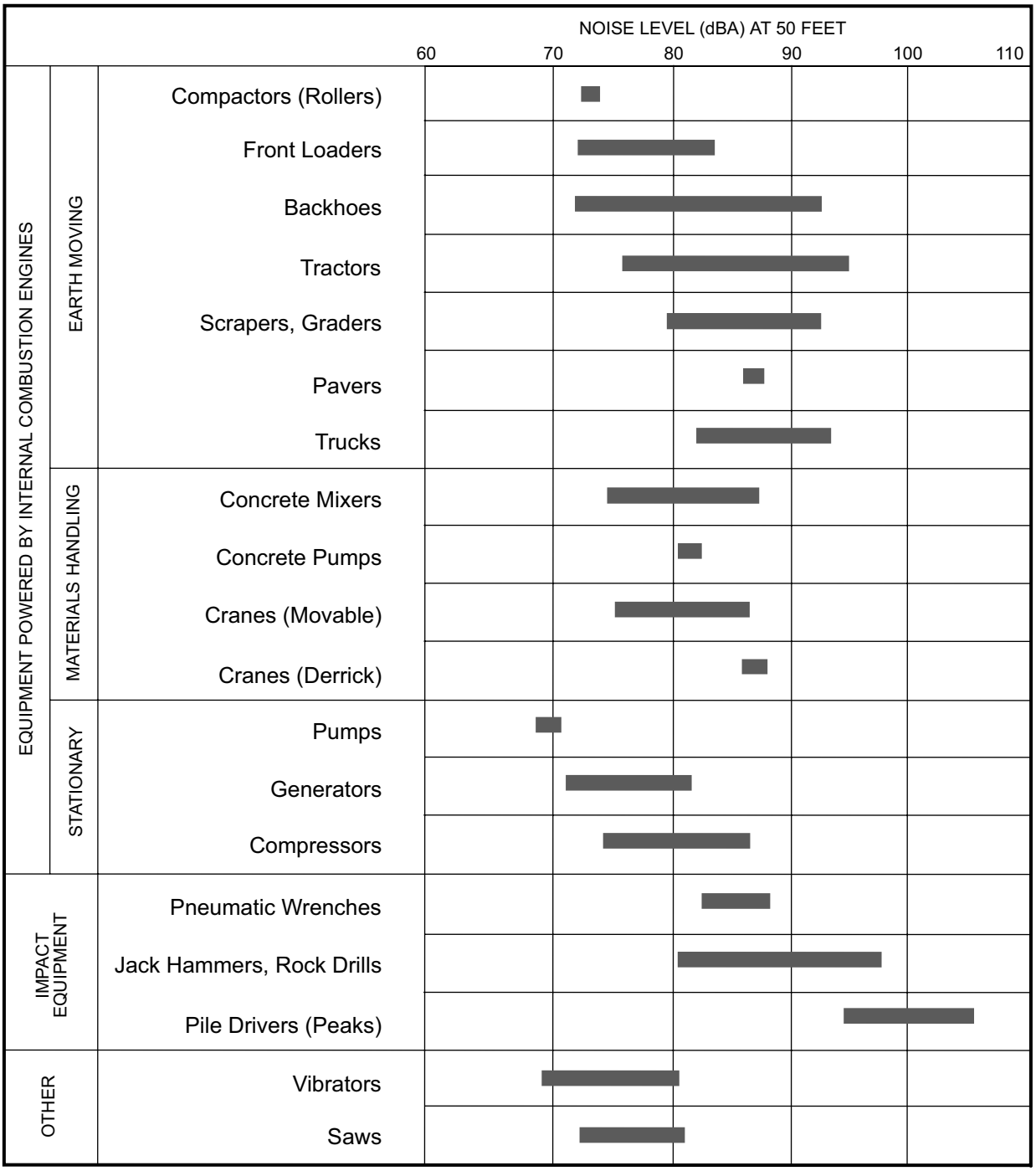
ppm	= parts per million
CO	= Carbon Monoxide
CAAQS	= California Ambient Air Quality Standard
NAAQS	= National Ambient Air Quality Standard

Source: http://www.epa.gov/air/airtrends/where.html

FIGURE 3a

COMMON OUTDOOR AND INDOOR NOISE LEVELS

COMMON OUTDOOR NOISE LEVELS	NOISE LEVEL (dBA)	COMMON INDOOR NOISE LEVELS
	110	
Jet Flyover at 1000 ft		
	100	
Gas Lawn Mower at 3 ft		Inside Subway Train (New York)
	90	
Diesel Truck at 50 ft		Food Blender at 3 ft
Noisy Urban Daytime	**80**	Garbage Disposal at 3 ft
		Shouting at 3 ft
Gas Lawn Mower 100 ft	**70**	Vacuum Cleaner at 10 ft
Commercial Area		Normal Speech at 3 ft
Heavy Traffic at 300 ft	**60**	
Quiet Urban Daytime		Large Business Office
	50	Dishwasher Next Room
Quiet Suburban Daytime		Small Theater or Large Conference
	40	
Quiet Urban Night Time		Room (Background)
Quiet Suburban Nighttime	**30**	Library
Quiet Rural Nighttime		Bedroom at Night
	20	Concert Hall (Background)
	10	Broadcast and Recording Studio
	0	Threshold of Hearing



Note: Based on limited available data samples.

SOURCE: United States Environmental Protection Agency, 1971, "Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances," NTID 300-1.

FIGURE 3b

Noise Levels of Typical Construction Equipment

759-02•02/06

ATTACHMENT D

FIGURES AND PHOTOGRAPHS

Figure 1 **Site Location Map**

Figure 2 **Facility Access Map**

Figure 3 **Site Plan**

Figure 4 **Area Geology**

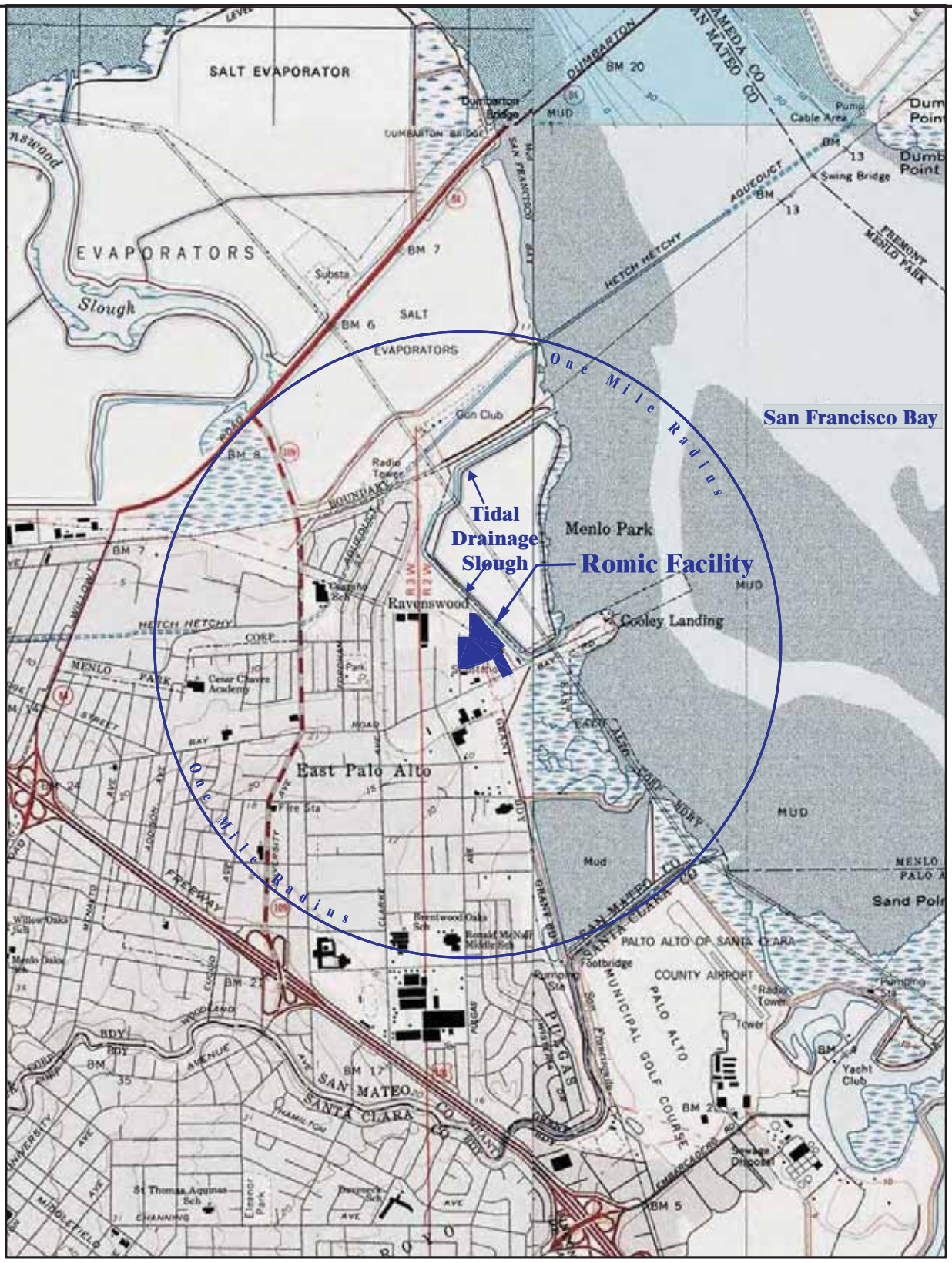
Figure 5 **Entrance to Romic Facility from Bay Road**

Figure 6 **Columns and Reboilers Within the Production Area**

Figure 7 **View from Bay Road looking North**

Figure 8 **Entrance to Bicycle Trail from Bay Road**

Figure 9 **Bicycle Trail northeast of Romic Facility**



N

0 2,000
SCALE IN FEET

I:/COMMON/PART-B-2000/SITE MAPS/B-1

Source:
The United States Geological Survey
1997 Quandrangle Topographical Maps
Palo Alto, California
Mountain View, California
Redwood Point, California
Newark, California

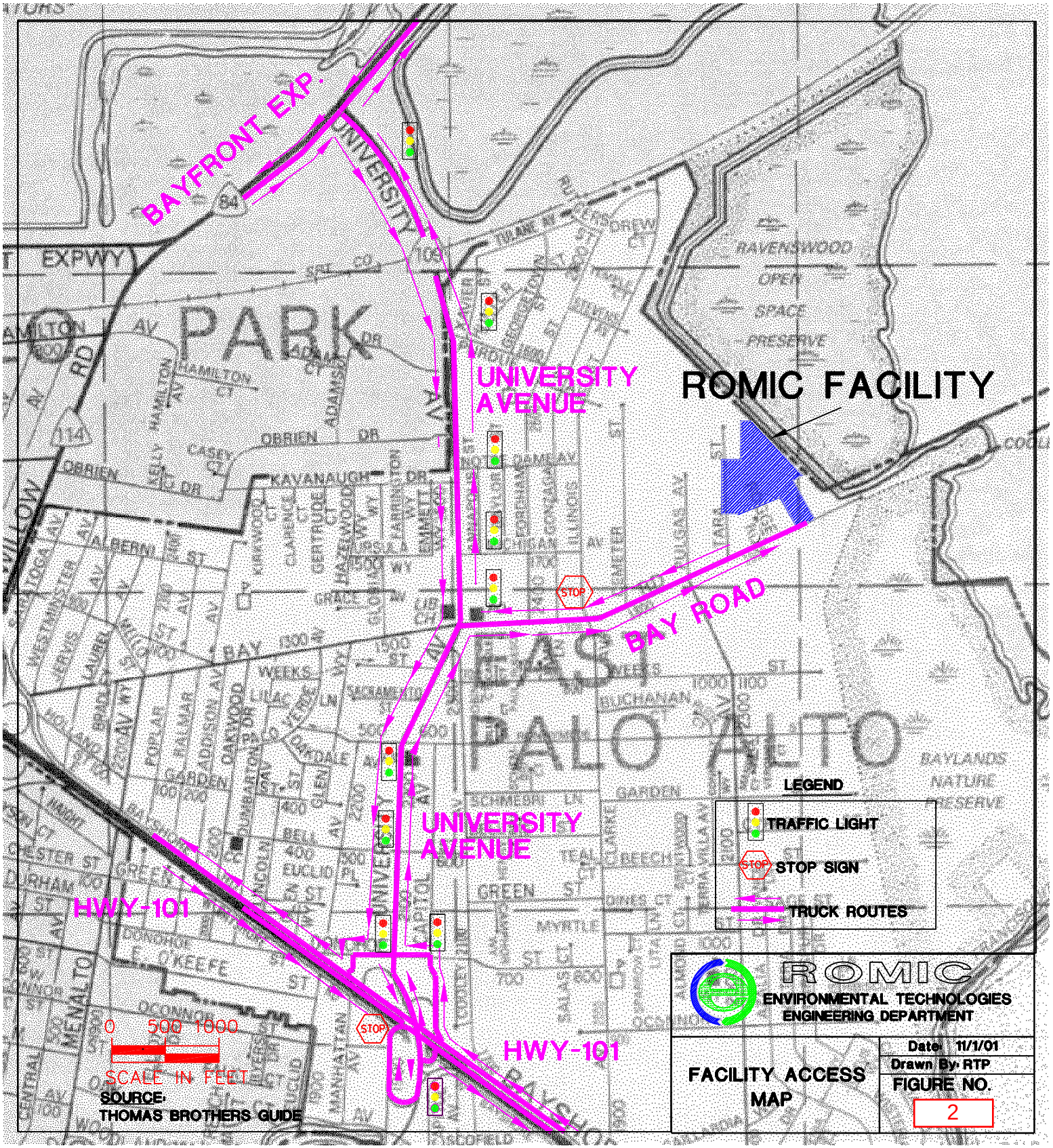
REV NO.	REVISION	APPVD. BY.	DATE

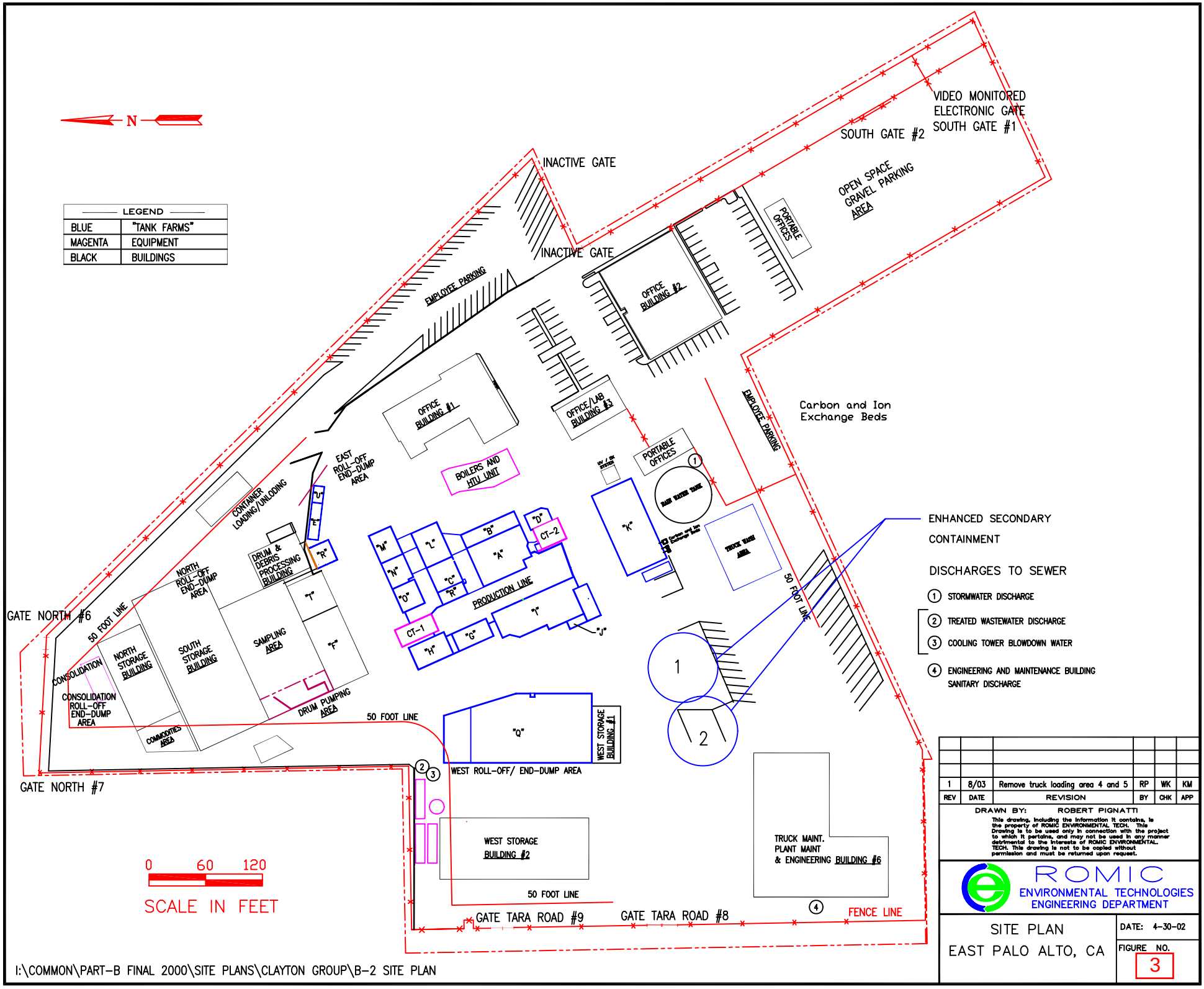
ROMIC
ENVIRONMENTAL TECHNOLOGIES
ENGINEERING DEPARTMENT

FACILITY LOCATION MAP SHOWING ONE MILE RADIUS

Drawn By: RTP

FIGURE NO.
1


BAYFRONT EXP.
UNIVERSITY AVENUE
ROMIC FACILITY
BAY ROAD
UNIVERSITY AVENUE
HWY-101
HWY-101
STOP
STOP
STOP
LEGEND
TRAFFIC LIGHT
STOP SIGN
TRUCK ROUTES
0 500 1000
SCALE IN FEET
SOURCE:
THOMAS BROTHERS GUIDE
ROMIC
ENVIRONMENTAL TECHNOLOGIES
ENGINEERING DEPARTMENT
FACILITY ACCESS MAP
Date: 11/1/01
Drawn By: RTP
FIGURE NO.
2



ENHANCED SECONDARY CONTAINMENT

DISCHARGES TO SEWER

1. STORMWATER DISCHARGE
2. TREATED WASTEWATER DISCHARGE
3. COOLING TOWER BLOWDOWN WATER
4. ENGINEERING AND MAINTENANCE BUILDING SANITARY DISCHARGE

REV	DATE	REVISION	BY	CHK	APP
1	8/03	Remove truck loading area 4 and 5	RP	WK	KM

DRAWN BY: ROBERT PIGNATTI

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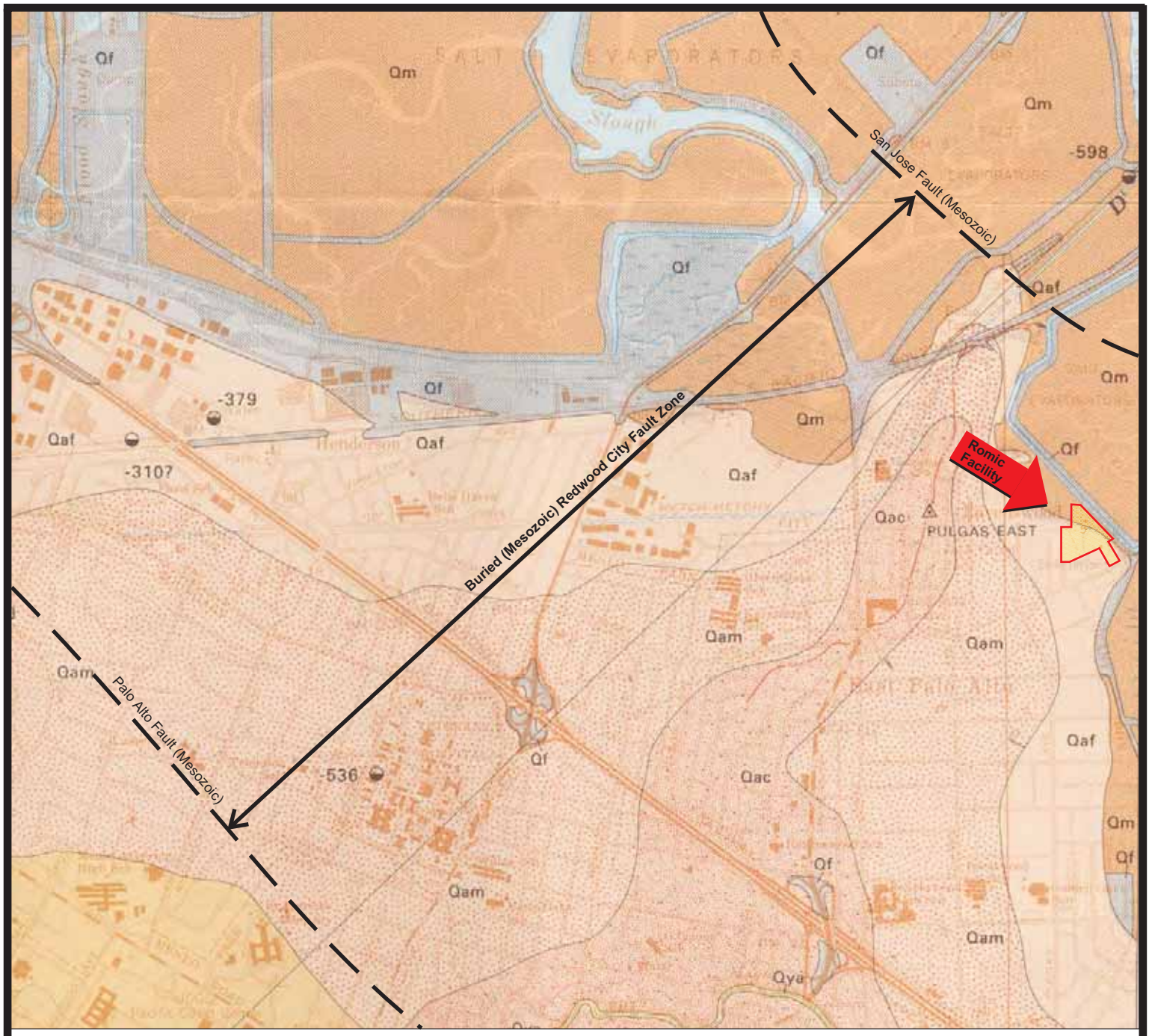
ENGINEERING DEPARTMENT

SITE PLAN
EAST PALO ALTO, CA

DATE: 4-30-02

FIGURE NO. 3

I:\COMMON\PART-B FINAL 2000\SITE PLANS\CLAYTON GROUP\B-2 SITE PLAN



Portion of the 7.5-Minute Series Palo Alto
and Part of Redwood Point
California
Quadrangle Geologic Map
United States Department of the Interior
Geological Survey
1993

N

QUADRANGLE LOCATION

AREA GEOLOGY
Romic Environmental Technologies
2081 Bay Road
East Palo Alto, California
Clayton Project No. 70-01789.00

Figure

4

Clayton GROUP SERVICES

Figure 5 Entrance to Romic Facility from Bay Road**.**

Figure 6 Columns and reboilers within the production area.

Figure 7 View from Bay Road looking north.
Rainwater tank in foreground and columns/reboilers in background.

Figure 8 Entrance to bicycle trail from Bay Road.
View of Romic Facility columns/reboilers to the northwest.

Figure 9 Bicycle trail northeast of Romic Facility.
Office building and columns/reboilers visible across slough.