

Section 3.9

Hazards and Hazardous Materials

3.9.1 Introduction

This section analyzes the proposed project's impacts associated with hazards and hazardous materials, including impacts from both construction and operational activities. As part of this analysis, the section describes the general approach and methodology, regulatory framework, environmental setting, and significance criteria used to evaluate the proposed project's effects related to hazards and hazardous materials impacts.

Comments in response to the NOP specific to potential impacts related to hazards and hazardous materials were received from the following agencies:

- California Department of Toxic Substances Control (DTSC) - Identify any recognized environmental conditions in project area, including release of hazardous waste/substances associated with current or historic uses at site. Address any hazardous materials associated with building demolition (asbestos, lead-based paints [LBP], mercury, etc.). If contaminated soil/groundwater exists, identify health and safety procedures.
- U.S. Environmental Protection Agency (USEPA), Region IX - Address expected types and volumes of hazardous materials in construction and operation. Include a Hazardous Materials Management Plan. Disclose any hazardous materials in existing buildings and in the ground, including handling/remediation/disposal, etc. of such materials.

3.9.2 General Approach and Methodology

The following hazards and hazardous materials evaluation relies in part on previous evaluations and reports reflected in the 2008 EIR for the SDIA Airport Master Plan,¹ which provides airport-wide information on hazards and hazardous materials; other site assessments and studies, including primarily the Phase I Environmental Site Assessment (Amec Phase I ESA)² and Phase II Environmental Site Investigation (Amec Phase II ESI) which provide detailed information on the project site in the vicinity of the T1 replacement³ and the Phase I Environmental Site Assessment (Kleinfelder Phase I ESA)⁴ and Phase II Environmental Site Assessment (Kleinfelder Phase II ESA)⁵

¹ San Diego Regional Airport Authority. San Diego International Airport Master Plan Final Environmental Impact Report. Section 5.15, Hazards and Hazardous Materials, SCRRAA #EIR-06-01, State Clearinghouse No. 2005091105. April 2008.

² Amec Foster Wheeler Environment and Infrastructure, Inc. Final Phase I Environmental Site Assessment: Project Area 2 – Southside T1RP and Support Facilities, San Diego International Airport, San Diego, California. July 26, 2017.

³ Amec Foster Wheeler Environment & Infrastructure, Inc. Final Phase II Environmental Site Investigation Report for Project Area 2 – Southside T1RP & Support Facilities, San Diego International Airport, San Diego, California. February 7, 2018.

⁴ Kleinfelder. Phase I Environmental Site Assessment: Project Area 3, Terminal 1 San Diego International Airport, San Diego, California. Kleinfelder Project No. 20182081.001A. November 17, 2017.

⁵ Kleinfelder. Phase II Environmental Site Assessment: Terminal 1, Project Area 3, San Diego International Airport, San Diego, California. Kleinfelder Project No. 20182081.001A. May 7, 2018.

which provide detailed information on the existing T1 and T1 apron;⁶ the Report of Limited Hazardous Building Materials Survey for T1 (T1 Hazardous Building Materials Survey);⁷ the 2019 Asbestos Reinspections;⁸ and regulatory databases – GeoTracker and EnviroStor.

The site-specific information focuses on the area where the replacement T1 and T1 parking structure would be implemented. The primary sources of this project-specific information are the Phase I ESA and Phase II ESI prepared by Amec in 2017 and 2018, respectively. As shown in Figure 3.9-1, the study area for the Phase I ESA and Phase II ESI is located south and east of the existing T1, and encompasses the T1 surface parking lot and area south of the runway from T1 to Lindbergh Field Way, including a portion of the former Teledyne Ryan Property (TDY site). Additional studies reviewed include the Post-Remediation Risk Assessment and Final Cleanup and Abatement Completion Report for the TDY site⁹ located to the east of the proposed new T1 site, and the Annual Site Conditions Certification Report¹⁰ for the Naval Training Center Waste Disposal Site (NTC site) located west of the existing T2. The TDY site and NTC Inactive Landfill site study area boundaries are shown on Figure 3.9-1.

The proposed project's impacts relative to hazards and hazardous materials were analyzed following a three-step process: (1) address the potential for encountering existing environmental contamination or hazardous materials in the project area; (2) identify the types and quantities of hazardous materials generated during the operation and construction of the project; and (3) evaluate these findings with respect to appropriate significance criteria. With respect to hazardous materials, this section includes an overview of the regulatory context by which these substances are managed; describes what is known about hazardous materials at the Airport and in surrounding areas; and evaluates whether the planned improvements to SDIA represent potentially significant environmental impacts in connection with these materials. This analysis assumes that SDCRAA will construct and operate all improvements to comply with federal, state, and local requirements (as detailed in Section 3.9.3 below).

For the purposes of this assessment, hazardous materials are meant to include the regulatory-defined terms of hazardous materials, hazardous wastes, hazardous substances, and dangerous goods; asbestos/asbestos-containing materials (ACM), and LBP and materials; environmental contamination to soil, surface waters, and groundwater; as well as the range of similarly regulated

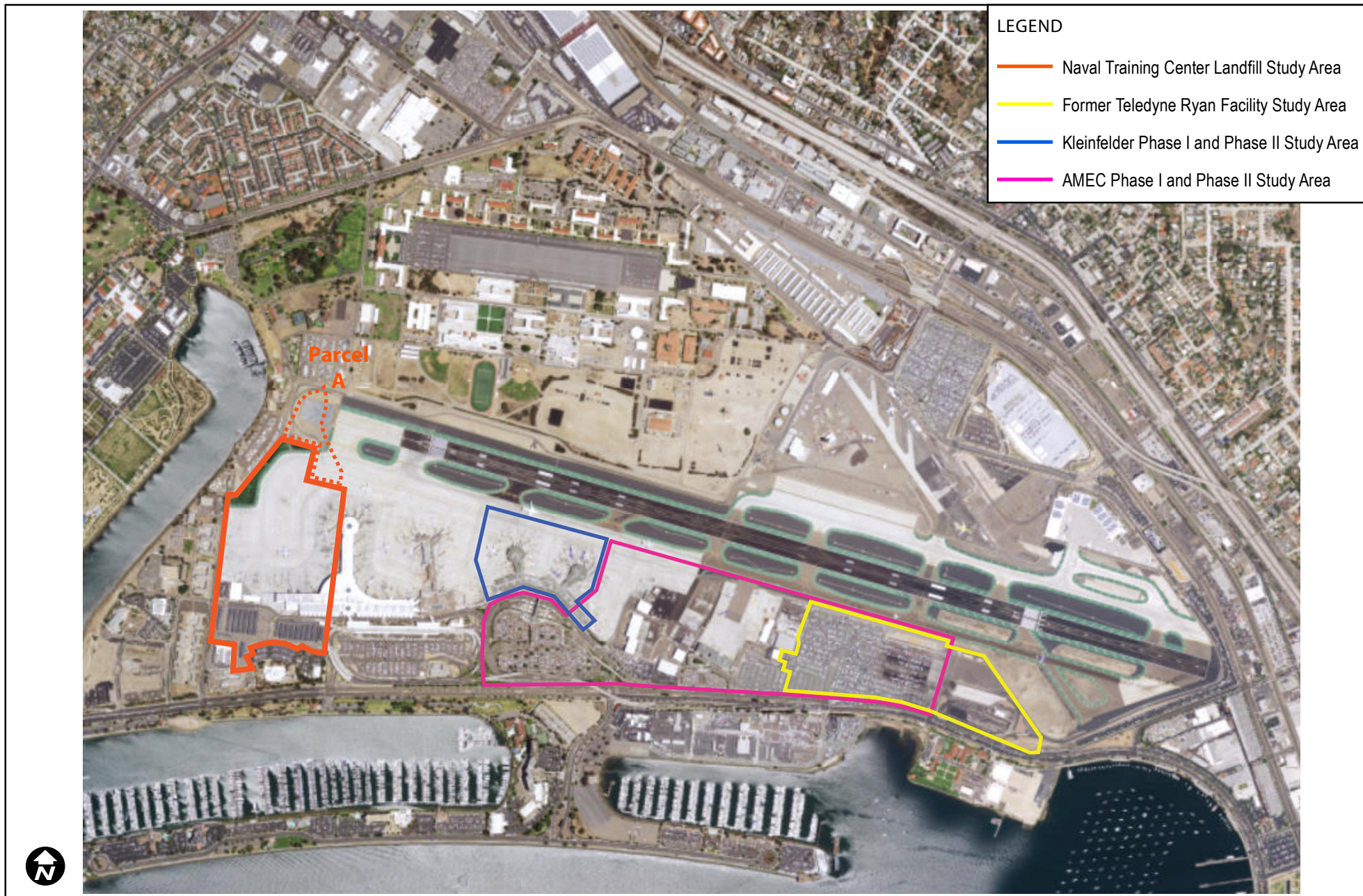
⁶ The AMEC Phase II ESI and Kleinfelder Phase II ESA both further investigate what is found in the respective Phase I studies and include sample collection environmental testing results. The difference in document titles (Phase II "ESI" or Phase II "ESA") is a difference in nomenclature and does not represent a difference in the studies' purpose or methodology. Each of the Phase II studies are referenced herein by their respective document titles ("ESI" or "ESA" as applicable).

⁷ Kleinfelder. Report of Limited Hazardous Building Material Survey, Terminal 1, San Diego International Airport, San Diego, California. Kleinfelder Project No. 20182081.001A. May 29, 2018.

⁸ Tetra Tech, Inc. 2019 Asbestos Reinspections. Prepared for San Diego County Regional Airport Authority, Environmental Affairs. March 21, 2019. Available: <http://www.san.org/Portals/0/Documents/Environmental/2019%20Annual%20Asbestos%20Reinspections.pdf>.

⁹ Geosyntec. Cleanup and Abatement Completion Report Airport/Former TDY Site, 2701 North Harbor Drive San Diego, California SL2090541880: Talo. Prepared for TDY Industries, LLC. December 12, 2014; Geosyntec, Inc., Post-Remediation Risk Assessment, Airport/Former TRA Site, 2701 North Harbor Drive, San Diego, California SL209054180: Talo. October 17, 2014.

¹⁰ Ninyo and Moore. Annual Site Conditions Certification Report Parcel A of the Naval Training Center (NTC) Waste Disposal Site (aka Former Site 1 – Old MCRD Landfill; aka Old MCRD Refuse Disposal Area) 3225 Harbor Drive, San Diego, California 92101 GeoTracker Global ID No. L10004197278 San Diego Water Board (Region 9) Case # 9 000000823/16591-1, SWIS No. 37-CR-0058, Reference Code 240135: K Schwall. Prepared for San Diego County Regional Airport Authority. October 30, 2018.



Source: Ninyo & Moore, 2007 and October 30, 2018; Geosyntec, December 12, 2014; Amec Foster Wheeler, 2017; Kleinfelder, 2018.

Figure 3.9-1

substances such as fuel and other petroleum-based products. Other hazards evaluated include those related to the safety of nearby residents and workers, and emergency response plans.

3.9.3 Regulatory Framework

Following is a summary of regulations/policies applicable to hazards and hazardous materials.

3.9.3.1 Federal

Resource Conservation and Recovery Act (RCRA)

The goal of the RCRA of 1976 (42 USC Sections 6901–6987; Title 40 of the Code of Federal Regulations [CFR]) is the protection of human health and the environment, the reduction of waste, the conservation of energy and natural resources, and the elimination of the generation of hazardous waste as expeditiously as possible. The Hazardous and Solid Waste Amendments of 1984 significantly expands the scope of RCRA by adding corrective action requirements, land disposal restrictions, and technical requirements. The corresponding regulations in 40 CFR Parts 260–299 provide the general framework for managing hazardous waste, including requirements for entities that generate, store, transport, treat, and dispose of hazardous waste. Under RCRA regulations, hazardous wastes must be tracked from the time of generation to the point of disposal. At a minimum, each generator of hazardous waste must register and obtain a hazardous waste activity identification number. If hazardous wastes are stored for more than 90 days or treated or disposed at a facility, any treatment, storage, or disposal unit must be permitted under RCRA. Additionally, all hazardous waste transporters are required to be permitted and must have an identification number. RCRA allows individual states to develop their own program for the regulation of hazardous waste as long as it is at least as stringent as RCRA. DTSC received authorization from USEPA to implement RCRA in 1992, and thus DTSC is the primary authority enforcing RCRA hazardous waste requirements in California.

The Clean Water Act

The 1972 Federal Water Pollution Control Act (also known as the Clean Water Act [CWA]) is the principal statute that governs water quality in the United States; it provides the legal framework to several state and local regulations. The statute employs a variety of regulatory and non-regulatory tools to sharply reduce direct pollutant discharges into waterways, finance municipal wastewater treatment facilities, and manage polluted runoff. These tools are employed to achieve the broader goal of restoring and maintaining the chemical, physical, and biological integrity of the nation's waters. The nationwide implementation of the CWA is the responsibility of the USEPA, in conjunction with the State Water Resources Control Board and the Regional Water Quality Control Boards that help implement and enforce CWA at the state and local levels. (See Section 3.10, Hydrology and Water Quality, for additional regulations and information regarding water quality.)

Hazardous Materials Transportation Act

Hazardous materials that could be excavated from construction or activities at the project site may require off-site transportation for disposal and/or treatment. Transportation and disposal of hazardous waste would be subject to the Hazardous Materials Transportation Act of 1975 (Title 49 CFR 171 Subchapter C and Title 13 California Code of Regulations [CCR]). It requires that every

employee who transports hazardous materials receive training to recognize and identify hazardous materials and become familiar with hazardous materials requirements. Vehicles transporting certain types or quantities of hazardous materials must display placards (warning) signs. Carriers are required to report accidental releases of hazardous materials to the U.S. Department of Transportation at the earliest practical moment. Other incidents that must be reported include deaths, injuries requiring hospitalization, and property damage exceeding \$50,000.

The California Highway Patrol (CHP) and the California Department of Transportation (Caltrans) are the state agencies with primary responsibility for enforcing federal and state regulations related to transportation within California. These agencies respond to hazardous materials transportation emergencies. Together, these agencies determine container types to be used and grant licenses to hazardous waste haulers for hazardous waste transportation on public roads.

Comprehensive Environmental Response, Compensation & Liability Act (CERCLA)

Congress enacted CERCLA, commonly known as Superfund, which authorizes USEPA to respond to releases, or threatened releases, of hazardous substances that may endanger public health, welfare, or the environment. CERCLA also enables USEPA to force parties responsible for environmental contamination to clean it up or to reimburse the Superfund for response or remediation costs incurred by USEPA. Proper site characterization and site remediation of hazardous materials is also regulated by CERCLA. CERCLA establishes prohibitions and requirements concerning closed and abandoned hazardous waste sites, provided for liability of persons responsible for releases of hazardous substances at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified. The Superfund Amendments and Reauthorization Act of 1986 revises various sections of CERCLA, extends the taxing authority for the Superfund and creates a free-standing law, Superfund Amendments and Reauthorization Act (SARA) Title III, also known as the Emergency Planning and Community Right-to-Know Act (see description below).

Emergency Planning and Community Right-to-Know Act (EPCRA)

Also known as Title III of the SARA, the EPCRA was enacted by Congress as the national legislation on community safety. SARA stresses the importance of permanent remedies and innovative treatment technologies in cleaning up hazardous waste sites; requires Superfund actions to consider the standards and requirements found in other state and federal environmental laws and regulations; provides new enforcement authorities and settlement tools; increases state involvement in every phase of the Superfund program; increases the focus on human health problems posed by hazardous waste sites; encourages greater citizen participation in making decisions on how sites should be cleaned up; and increases the size of the trust fund to \$8.5 billion. This law was designated to help local communities protect public health, safety, and the environment from chemical hazards. To implement this act, Congress requires each state to appoint a State Emergency Response Commission (SERC). These commissions are required to divide their states into Emergency Planning Districts and to name a Local Emergency Planning Committee for each district. The act provides requirements for emergency release notification, chemical inventory reporting, and toxic release inventories for facilities that handle chemicals.

Occupational Safety and Health Act

Occupational safety standards have been established in federal and state laws to minimize worker safety risks from both physical and chemical hazards in the workplace. The goal of the federal Occupational Safety and Health Act of 1970, administered by the Occupational Safety and Health Administration (OSHA), is to ensure that employers provide workers with an environment free from recognized hazards to safety and health, such as exposure to toxic chemicals, excessive noise levels, mechanical dangers, heat or cold stress, or unsanitary conditions. Federal OSHA's requirements for General Industry are contained within the Code of Federal Regulations at 29 CFR 1910, and Federal OSHA's requirements for the Construction Industry are contained within 29 CFR 1926.

Toxic Substances Control Act

In 1976, the federal Toxic Substances Control Act (15 USC Sections 2601–2671) established a system of evaluation in order to identify chemicals which may pose hazards. The Toxic Substances Control Act also establishes a process by which public exposure to hazards may be reduced through manufacturing, distribution, use, and disposal restrictions or labeling of products. Under the Toxic Substances Control Act (40 CFR 763), the USEPA has enacted strict requirements on the use, handling, and disposal of ACM. These regulations include the phasing out of friable asbestos and ACM in new construction materials beginning in 1979 (40 CFR 763). Friable asbestos may be found in pre-1979 construction. In addition, due to potential adverse health effects in exposed persons, in 1989 the USEPA banned most uses of asbestos in the country. Although most of the ban was overturned in 1991, the current banned product categories include corrugated paper, rollboard, commercial paper, specialty paper, flooring felt, and any new uses. The Toxic Substances Control Act is enforced by the USEPA through inspections of places in which ACM are manufactured, processed, and stored and through the assessment of administrative and civil penalties and fines, as well as injunctions against violators.

Executive Order 12088, Federal Compliance with Pollution Control

Executive Order 12088, Federal Compliance with Pollution Control, mandates that necessary actions be taken to prevent and control environmental pollution when federal activities or federal facilities are involved. As implementation of the proposed project would require various federal approvals, Executive Order 12088 is relevant to ensure compliance with applicable federal pollution control standards.

3.9.3.2 State

California Occupational Safety and Health Act

The California Occupational Safety and Health Act of 1973 (Title 8 CCR) is implemented by CalOSHA, which has primary responsibility for developing and enforcing standards for safe workplaces and work practices in California. For example, under Title 8 CCR 5194 (Hazard Communication Standard), construction workers must be informed about hazardous substances that may be encountered. Compliance with Injury and Illness Prevention Program requirements (Title 8 CCR 3203) would ensure that workers are properly trained to recognize workplace hazards and to take appropriate steps to reduce potential risks due to such hazards. This would be relevant

if previously unidentified contamination or buried hazards are encountered. If additional investigation or remediation is determined to be necessary, compliance with CalOSHA standards for hazardous waste operations (Title 8 CCR 5192) would be required for those individuals involved in the investigation or cleanup work. A Site Health and Safety Plan must be prepared prior to commencing any work at a contaminated site or involving disturbance of building materials containing hazardous substances, to protect workers from exposure to potential hazards.

California Government Code Section 65962.5(a), Cortese List

The Hazardous Waste and Substance Sites (Cortese) List is a planning document used by the state, local agencies, and developers to comply with CEQA requirements in providing information about the location of hazardous materials release sites. Government Code Section 65962.5 requires that the California Environmental Protection Agency (CalEPA) develop, at least annually, an updated Cortese List. The DTSC is responsible for a portion of the information contained in the Cortese List. Other state and local government agencies are required to provide additional hazardous material release information for the Cortese List.

California Health & Safety Code, Hazardous Materials Release Response Plans and Inventory Law

Two programs found in the California Health & Safety Code (H&SC) Chapter 6.95 are directly applicable to the CEQA issue of risk due to hazardous substance release. In San Diego County, these two programs are referred to as the Hazardous Materials Business Program (HMBP) and the California Accidental Release Program (CalARP). The County of San Diego Department of Environmental Health (DEH) Hazardous Materials Division (HMD) is responsible for the implementation of the HMBP program and the CalARP program in San Diego County. The HMBP and CalARP Program provide threshold quantities for regulated hazardous substances. When the indicated quantities are exceeded, a HMBP or Risk Management Plan (RMP) is required pursuant to the regulation. Congress requires USEPA Region 9 (which includes California as well as Nevada, Arizona, and Hawaii) to make RMP information available to the public through USEPA's Envirofacts Warehouse at <https://www3.epa.gov/enviro/>.

Businesses in California that handle hazardous materials are required to comply with the Hazardous Materials Release Response Plans and Inventory Law of 1985 (Business Plan Act, also known as the Waters Bill) (Assembly Bill 2185; California H&SC, Chapter 6.6). Basic requirements of hazardous materials planning include the development of detailed hazardous materials inventories used and stored on-site, a program of employee training for hazardous materials release response, and the identification of emergency contacts and response procedures. The reporting thresholds for hazardous materials are 55 gallons of a liquid; 500 pounds of a solid; and 200 cubic feet of a compressed gas measured at standard temperature and pressure. The law aims to ensure that the hazardous materials are properly handled, used, stored, and disposed of, and in the event that such materials are accidentally released, to prevent or reduce injury to health and the environment. This law is also designed to reduce the occurrence and severity of hazardous materials releases. However, an exemption exists for facilities (retail stores) handling hazardous materials contained solely in a consumer product and pre-packaged for direct distribution to, and use by, the general public.

California Fire Code

The California Fire Code (Title 24, CCR Part 9) regulates the types, configuration, and quantities of hazardous materials that can be stored within structures. The California Fire Code also regulates the storage of hazardous materials (e.g., storage tanks) in outdoor areas. These regulations are implemented through regular inspections of on-site operations and through issuance of notices of violation in cases where storage facilities do not meet code requirements.

Hazardous Waste Control Law

The CalEPA and DTSC regulate the generation, transportation, treatment, storage, and disposal of hazardous waste. The CalEPA has authorized DTSC to enforce the Hazardous Waste Control Law (California H&SC, Division 20, Chapter 6.5, Article 2), which implements the federal RCRA cradle-to-grave waste management system in California for handling hazardous waste in a manner that protects human health and the environment. It establishes criteria for identifying, packaging, and labeling hazardous wastes; prescribes management of hazardous waste; establishes permit requirements for hazardous waste treatment, storage, disposal, and transportation; and identifies hazardous wastes that cannot be disposed of in landfills. California hazardous waste regulations can be found in Title 22, Division 4.5, “Environmental Health Standards for the Management of Hazardous Wastes.” CalEPA has delegated some of its authority under the Hazardous Waste Control Law to county health departments and other Certified Unified Program Agencies, including the County of San Diego DEH.

Under the federal RCRA, asbestos is not regulated as hazardous waste, but under the State Hazardous Waste Control Law, it is considered a “non-Resource Conservation and Recovery Act” or “California-only” hazardous waste. ACM is classified as hazardous waste if they are friable and contain one percent or more asbestos (CCR, Title 22, Section 66261.24). Non-friable bulk asbestos-containing waste is considered by DTSC as nonhazardous regardless of its asbestos content, so it is not subject to regulation under CCR, Title 22, Division 4.5. The DTSC regulates the packaging, on-site accumulation, transportation (through standards applicable to transporters of hazardous waste), and disposal of asbestos when it is a hazardous waste.

Title 23 of the California Code of Regulations, Underground Storage Tank Act

The underground storage tank (UST) monitoring and response program is required under Chapter 6.7 of the California H&SC and Title 23 of the CCR. The program was developed to ensure that the facilities meet regulatory requirements for design, monitoring, maintenance, and emergency response in operating or owning USTs. The County of San Diego DEH is the local administering agency for this program.

Safe Drinking Water and Toxic Enforcement Act

The Safe Drinking Water and Toxic Enforcement Act (Proposition 65) is a right-to-know statute that requires businesses to notify Californians about exposures to listed chemicals. Proposition 65 also prohibits California businesses from knowingly discharging significant amounts of listed chemicals into sources of drinking water. The Proposition was intended by its authors to protect the state's drinking water sources from chemicals known to cause cancer, birth defects or other

reproductive harm, and to inform citizens about exposures to such chemicals. The Office of Environmental Health Hazard Assessment administers the Proposition 65 program. The list contains a wide range of naturally occurring and synthetic chemicals that cause cancer or birth defects or other reproductive harm. These chemicals include additives or ingredients in pesticides, common household products, food, drugs, dyes, or solvents. Listed chemicals may also be used in manufacturing and construction, or they may be byproducts of chemical processes, such as motor vehicle exhaust.

Emergency Services Act

Similar to the federal EPCRA, the state has long recognized its responsibility to mitigate the effects of natural, manmade, or war-caused emergencies which result in conditions of disaster or in extreme peril to life, property, and the resources of the state, and generally to protect the health and safety and preserve the lives and property of the people of the state. In 1970, the California Emergency Services Act was enacted to supersede the California Disaster Act. The Governor's Office of Emergency Services administers the Emergency Services Act (California Government Code Sections 8550 et seq.). The State of California Emergency Plan (SEP) is a requirement of the California Emergency Services Act. The SEP describes methods for conducting emergency operations, the process for rendering mutual aid, emergency services of government agencies, how resources are mobilized, how the public is informed, and how continuity of government is maintained during emergency. The SEP further describes hazard mitigation (actions to reduce risk), as well as preparedness and recovery from disasters. The SEP should be read and understood before an emergency occurs. It outlines activities of all California government and non-governmental organizations working together as a comprehensive, statewide emergency management system.

3.9.3.3 Local

County of San Diego Air Pollution Control District

The mission of the County of San Diego Air Pollution Control District (SDAPCD) is to protect the public from the harmful effects of air pollution, achieve and maintain air quality standards, foster community involvement, and develop and implement cost-effective programs meeting state and federal mandates, considering environmental and economic impacts. The SDAPCD is the local agency responsible for enforcing rules and regulations for asbestos removal and demolition operations. The Asbestos National Emission Standard for Hazardous Air Pollutants, 40 CFR 61, Subpart M is enforced locally under SDAPCD Regulation XI, Subpart M - Rule 361.145. Additionally, in November 2017, the SDAPCD adopted Rule 1206 to more clearly define terminology, establish specific facility survey requirements to determine the presence or absence of asbestos, clarify when a renovation or demolition is regulated, detail notification and communication requirements with the SDAPCD, and specify work practice and waste handling requirements to limit asbestos emissions from building renovation and demolition activities. Rule 1206 requires a facility survey be performed to determine the presence or absence of ACM, regardless of the age of the facility. Asbestos that is regulated or that may become regulated during the demolition, is required to be removed prior to the demolition.

Other SDAPCD rules (such as Rules 50, 51, and 59) require permits, monitoring plans, and other dust mitigation measures for large scale construction projects and waste sites.

San Diego County Multi-Jurisdictional Hazard Mitigation Plan

The San Diego County Multi-Jurisdictional Hazard Mitigation Plan (HAZMIT)¹¹ is a countywide plan that identifies risks specific to San Diego County and methods and strategies for risk minimization. The current plan, first adopted in 2004 and last revised in 2010, serves several purposes, such as enhancing public awareness, creating a decision tool for management, promoting compliance with state and federal program requirements, enhancing local policies for hazard mitigation capability, and providing inter-jurisdictional coordination. The list of hazards identified in the plan are: wildfire/structure fire, flood, coastal storms/erosion/tsunami, earthquake/liquefaction, rain-induced landslide, dam failure, hazardous materials incidents, nuclear materials release, and terrorism. The County of San Diego Office of Emergency Services (OES) is responsible for coordinating with local jurisdictions and participating agencies to monitor, evaluate, and update the HAZMIT as necessary. The plan is currently being reviewed and updated to address any changes in the hazards and programs in place to minimize or eliminate those hazards. The revision will include an evaluation of the impact climate change is having on the natural hazards identified for San Diego County.¹²

San Diego County Operational Area Emergency Operations Plan

The San Diego County Operational Area Emergency Operations Plan,¹³ last updated in 2014, is for use by the County and all cities within the county to respond to major emergencies and disasters. It describes the roles and responsibilities of all county departments, and the relationship between the county departments and the jurisdictions within the county. The Plan identifies a comprehensive emergency management system which provides for a planned response to disaster situations (i.e., natural disasters, technological incidents, terrorism and nuclear-related incidents) and describes the overall responsibilities for protecting life and property and assuring the overall well-being of the population. The plan also identifies the sources of outside support which might be provided (through mutual aid and specific statutory authorities) by other jurisdictions, state and federal agencies, and the private sector.

City of San Diego Lead Hazard Prevention and Control Ordinance

The City of San Diego Lead Hazard Prevention and Control Ordinance¹⁴ requires that everyone who disturbs paint on pre-1979 structures of any kind or from any surface on a steel structure in the

¹¹ County of San Diego, Office of Emergency Services and San Diego County Unified Disaster Council. San Diego County Multi-Jurisdictional Hazard Mitigation Plan, San Diego County, California. August 2010. Available: https://www.sandiegocounty.gov/oes/emergency_management/oes_jl_mitplan.html.

¹² County of San Diego, Office of Emergency Services. Multi-Jurisdictional Hazard Mitigation Plan webpage. Available: https://www.sandiegocounty.gov/oes/emergency_management/oes_jl_mitplan.html.

¹³ County of San Diego, Office of Emergency Services. Unified San Diego County Emergency Services Organization & County of San Diego Operational Area Emergency Operations Plan. September 2014. Available: https://www.sandiegocounty.gov/content/sdc/oes/emergency_management/oes_jl_oparea.html.

¹⁴ City of San Diego Municipal Code. Chapter 5, Article 4, Division 10. Ordinance numbers O-19063 and O-19732. Section 54.1001 et seq.

City of San Diego use lead-safe work practice standards specific in the ordinance unless a Certified Lead Inspector/Assessor determines the concentration of lead in the paint is below 1000 parts per million (ppm) or .5 milligram per square centimeter (mg/cm²).

SDCRAA Asbestos Operations and Maintenance Plan

SDCRAA is required to give notice to employees, tenants, and contractors working at any SDCRAA-owned facility that has asbestos-containing construction materials, pursuant to the Asbestos Notification Law (California H&SC 25915 et seq., and in particular 25915.1).

SDCRAA has an Asbestos Operations and Maintenance Plan in effect to insure proper warning labels and to periodically inspect and document the condition of the ACM and to make repairs, if necessary. As part of the Plan, SDCRAA produces an annual report listing the location and condition of known ACM throughout the Airport. The current report is entitled “2019 Asbestos Reinspections.”¹⁵

3.9.4 Environmental Setting

Hazardous Materials/Wastes Used Onsite and Known/Potential Contamination Areas

Based upon the review of available documents and discussions with SDCRAA staff, SDIA uses the kinds of hazardous materials and similarly regulated substances typically utilized by most metropolitan airports that offer commercial service. These hazardous materials and substances include, among others, diesel fuel, compressed natural gas, jet fuel, propane, waste oil, fire retardants, and cleaning chemicals.¹⁶ Activities and facilities that involve the use of these materials include the fueling, servicing and repair of aircraft, ground support equipment (GSE) and motor vehicles; the operation and maintenance of the airfield, main terminal complex and passenger concourses; and a range of other special purposes connected with commercial aviation (i.e., fire safety and emergency response, rental car and air cargo facilities, navigation and air traffic control functions, etc.).¹⁷

By far, aircraft and motor vehicle fuels make up the largest quantities of hazardous substances used at SDIA. These fuels are contained in USTs and above-ground storage tanks (ASTs) ranging in size from less than 500 to 1,000,000 gallons. These are located primarily in the northern portion of the Airport property, including at the Rental Car Center, fuel farm, and maintenance facilities (at the northside and southside of the Airport). The aircraft fuel types predominately include Jet-A and Av-gas and the motor vehicle fuels include gasoline and diesel.¹⁸ Additionally, a fuel station (jet

¹⁵ Tetra Tech, Inc. 2019 Asbestos Reinspections. Prepared for San Diego County Regional Airport Authority, Environmental Affairs. March 21, 2019. Available: <http://www.san.org/Portals/0/Documents/Environmental/2019%20Annual%20Asbestos%20Reinspections.pdf>.

¹⁶ California Environmental Protection Agency (CalEPA). CalEPA Regulated Site Portal webpage. Available: <https://siteportal.calepa.ca.gov/nsite/>.

¹⁷ San Diego Regional Airport Authority. San Diego International Airport Master Plan Final Environmental Impact Report. Section 5.15, Hazards and Hazardous Materials, SCRRRA #EIR-06-01, State Clearinghouse No. 2005091105. April 2008.

¹⁸ San Diego Regional Airport Authority. San Diego International Airport Master Plan Final Environmental Impact Report. Section 5.15, Hazards and Hazardous Materials, SCRRRA #EIR-06-01, State Clearinghouse No. 2005091105. April 2008.

fuel rack) is located at the southside of the Airport, approximately 400 feet north of the Airport Administration Offices (the former Commuter Terminal).

Other, smaller amounts of petroleum-products (e.g., lubricants and solvents), waste materials (i.e., used oils, cleaning residues, and spent batteries) and manufactured chemicals (i.e., herbicides, fertilizers, paints, fire-fighting foam, de-icing fluids, etc.) are used in various locations throughout the Airport. These are characteristically used on a routine basis in support of aircraft, GSE, and motor vehicle maintenance activities and for a range of other functions to keep the Airport operational and meet aviation safety requirements.

As discussed further in Section 3.10, Hydrology and Water Quality, operations at SDIA are subject to National Pollutant Discharge Elimination System (NPDES) Permit No. CAS000001, a statewide General Permit to Discharge Storm Water Associated with Industrial Activity. Covered activities include, among others, aircraft maintenance and fueling, cleaning, and deicing operations.

The permit requires a Permittee to develop and implement Stormwater Management Plans containing Best Management Practices (BMPs) intended to eliminate or reduce the release of contaminants into the environment. A number of these BMPs pertaining to hazardous materials include secondary containment and covered storage facilities; procedures and equipment for the clean-up of spills and accidental releases; training, auditing, and other work practices. Additionally, the SDCRAA and many of the tenants at SDIA have established Hazardous Materials Release Response Plans in compliance with the Hazardous Materials Release Response Plans and Inventory Law of 1985. The plans include inventories of hazardous materials used and stored on-site, a program of employee training for hazardous materials release response, and the identification of emergency contacts and response procedures.

Various government databases were reviewed to identify potential areas of groundwater and/or soil contamination on, or in the vicinity of, the project site. The Kleinfelder and AMEC Phase 1 ESAs included a public records search of government databases that was performed electronically by Environmental Data Resources, Inc. (EDR). The search included areas within a 1-mile radius from the center of the proposed new T1 site, which encompasses all the ADP project area. It included information from databases on registered USTs, operators who are hazardous waste generators, former landfills, and sites with known hazardous materials release, amongst others. The results of the EDR database search are summarized in Table 3.9-1.

Table 3.9-1: Summary of EDR Records Search Results

Regulatory Database	Replacement T1 Construction Area	0.5 Mile from T1 Construction Area (includes on- and off-Airport areas)	From 0.5 mile to 1 mile from T1 Construction Area (off-Airport)
SEMS	1	0	0
SEMS-ARCHIVE	0	2	NR
RCRA CORRACTS	0	1	2
RCRA-TSDF	0	1	NR
RCRA-LQG	1	0*	NR
RCRA-SQG	1	12*	NR
ERNS	1	NR	NR
Response	0	1	2
ENVIROSTOR	0	8	22
SWF/LF	0	1	NR
SAN DIEGO CO. SAM	1	18	NR
LUST	1	20	NR
SLIC	2	20	NR
UST	0	1*	NR
AST	1	8*	NR
WMUDS/SWAT	0	1	0
HIST Cal-Sites	0	1	0
San Diego Co. HMMD	1	NR	NR
Toxic Pits	0	1	0
SWEEPS UST	1	10*	NR
HIST UST	1	11	NR
CHMIRS	5	NR	NR
RCRA NonGen/NLR	0	2*	NR
DOD	0	0	1
FINDS	10	NR	NR
HAZNET	11	NR	NR
HIST CORTESE	0	10	NR
HWP	0	2	2
NPDES	3	NR	NR
Notify 65	0	6	6
WDS	1	NR	NR
ECHO	1	NR	NR
RGA LUST	1	NR	NR

Source: Amec Foster Wheeler Environment and Infrastructure, Inc. Final Phase I Environmental Site Assessment: Project Area 2 – Southside T1RP and Support Facilities, San Diego International Airport, San Diego, California. Appendix G – EDR Radius Map with GeoTracker Report. July 26, 2017; Kleinfelder. Phase I Environmental Site Assessment: Project Area 3, Terminal 1 San Diego International Airport, San Diego, California. Kleinfelder Project No. 20182081.001A. Appendix B – EDR Radius Map with GeoTracker Report. November 17, 2017.

Notes:

* Records were not requested beyond a distance of 0.25 mile.

NR – records were not requested for this distance.

SEMS - Superfund Enterprise Management System. Database and management system used by USEPA to track activities at hazardous waste sites considered for cleanup under CERCLA.

SEMS-ARCHIVE - Superfund Enterprise Management System Archive. SEMS-ARCHIVE tracks sites that have been removed and archived from the inventory of the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) database, indicating that assessment at a site has been completed and that, based on available information, USEPA has judged the location not to be a potential National Priorities List (NPL) site.

RCRA CORRACTS - Resource Conservation and Recovery Act Corrective Action Report. RCRA CORRACTS is a list of hazardous waste handlers with RCRA Corrective Action Activity. This report shows which nationally-defined corrective action events have occurred for every handler that has had corrective action activity.

RCRA-TSDF – RCRA Treatment, Storage and Disposal. RCRAInfo is EPA's comprehensive information system, providing access to data supporting the RCRA of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by RCRA. Transporters are individuals or entities that move hazardous waste from the generator offsite to a facility that can recycle, treat, store, or dispose of the waste. TSDFs treat, store, or dispose of the waste.

RCRA-LQG – RCRA Large Quantity Generators. The database provides selective information on sites which generate, transport, store, treat and/or dispose of hazardous wastes as defined by RCRA. Large quantity generators (LQGs) generate over 1,000 kilograms (kg) of hazardous wastes, or over 1 kg of acutely hazardous waste per month.

RCRA-SQG – RCRA Small Quantity Generators. The database provides selective information on sites which generate, transport, store, treat and/or dispose of hazardous wastes as defined by RCRA. Small quantity generators (SQGs) generate between 100 kg and 1,000 kg of hazardous wastes per month.

ERNS - Emergency Response Notification System. ERNS records and stores information on reported releases of oil and hazardous substances.

RESPONSE - RESPONSE identifies confirmed release sites where the Department of Toxic Substances Control (DTSC) is involved in remediation, either in a lead or oversight capacity. These confirmed release sites are generally high-priority and high potential risk.

ENVIROSTOR – EnviroStor Database. The DTSC's Site Mitigation and Brownfields Reuse Program's (SMBRP's) EnviroStor Database identifies sites that have known contamination or sites for which there may be reasons to investigate further. The database includes sites designated as Superfund sites (NPL); State Response, including Military Facilities and State Superfund; Voluntary Cleanup; and School sites.

SWF/LF – Solid Waste Information System Active, Closed and Inactive Landfills. SWF/LF records typically contain an inventory of solid waste disposal facilities or landfills. These may be active or inactive facilities or open dumps that failed to meet RCRA Section 4004 criteria for solid waste landfills or disposal sites.

SAN DIEGO CO. SAM – County of San Diego Site Assessment and Mitigation. The listing contains all underground tank release cases and projects pertaining to properties contaminated with hazardous substances that are actively under review by the Site Assessment and Mitigation Program

LUST – Leaking Underground Storage Tank Information System. LUST records contain an inventory of reported leaking underground storage tank (UST) incidents.

SLIC - Cleanup Program Sites (CPS; also known as Site Cleanups [SC] and formerly known as Spills, Leaks, Investigations, and Cleanups [SLIC] sites) included in GeoTracker. GeoTracker is the State Water Resources Control Board (SWRCB) data management system for sites that impact, or have the potential to impact, water quality in California, with emphasis on groundwater.

UST - Underground Storage Tank Information System. Listing of registered underground storage tanks by the SWRCB under the RCRA.

AST – Aboveground Storage Tank Information System. A listing of aboveground storage tank petroleum storage tank locations.

WMUDS/SWAT - Waste Management Unit Database System. Used for program tracking and inventory of waste management units. The source is the SWRCB.

HIST Cal-Sites - Calsites Database. The Calsites database contains both known and potential hazardous substance sites. The database is no longer updated by the state agency and has been replaced by ENVIROSTOR.

San Diego Co. HMMD – County of San Diego Hazardous Materials Management Division. Listing of County of San Diego Hazardous Materials Division contaminated sites.

Toxic Pits - Toxic Pits Cleanup Act Sites database. This listing identifies sites suspected of containing hazardous substances where cleanup has not yet been completed. The data come from the SWRCB.

SWEEPS UST –Statewide Environmental Evaluation and Planning System UST listing. The listing was updated and maintained by a company contacted by the SWRCB. The list is no longer updated or maintained.

HIST UST - Historical Hazardous Substance Storage Container Database. The HIST UST database is a historical listing of UST sites.

CHMIRS - California Hazardous Material Incident Reporting System. CHMIRS contains information on reported hazardous material incidents (accidental releases or spills).

RCRA NonGen/NLR – RCRA – Non Generators/No Longer Regulated. RCRA databases include selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Non-Generators do not presently generate hazardous waste.

DOD - Department of Defense Sites. Listing consists of federally owned or administered lands, administered by the Department of Defense, that have any area equal to or greater than 640 acres.

FINDS - Facility Index System/Facility Registry System Facility Index System. FINDS contains both facility information and 'pointers' to other sources that contain more detail.

HAZNET - Hazardous Waste Information System Facility and Manifest Data. Listing includes data extracted from the copies of hazardous waste manifests each year by DTSC.

HIST CORTESE – Hazardous Waste & Substance Site List. The sites included in the list are designated by the State Water Resource Control Board [LUST], the Integrated Waste Board [SWF/LS], and the Department of Toxic Substances Control [CALSITES]. This listing is no longer updated.

HWP - EnviroStor Permitted Facilities Listing. The listing provides detailed information on permitted hazardous waste facilities and corrective action ("cleanups") tracked in EnviroStor.

NPDES - National Pollutant Discharge Elimination System Permits Listing. A listing of NPDES permits, including stormwater.

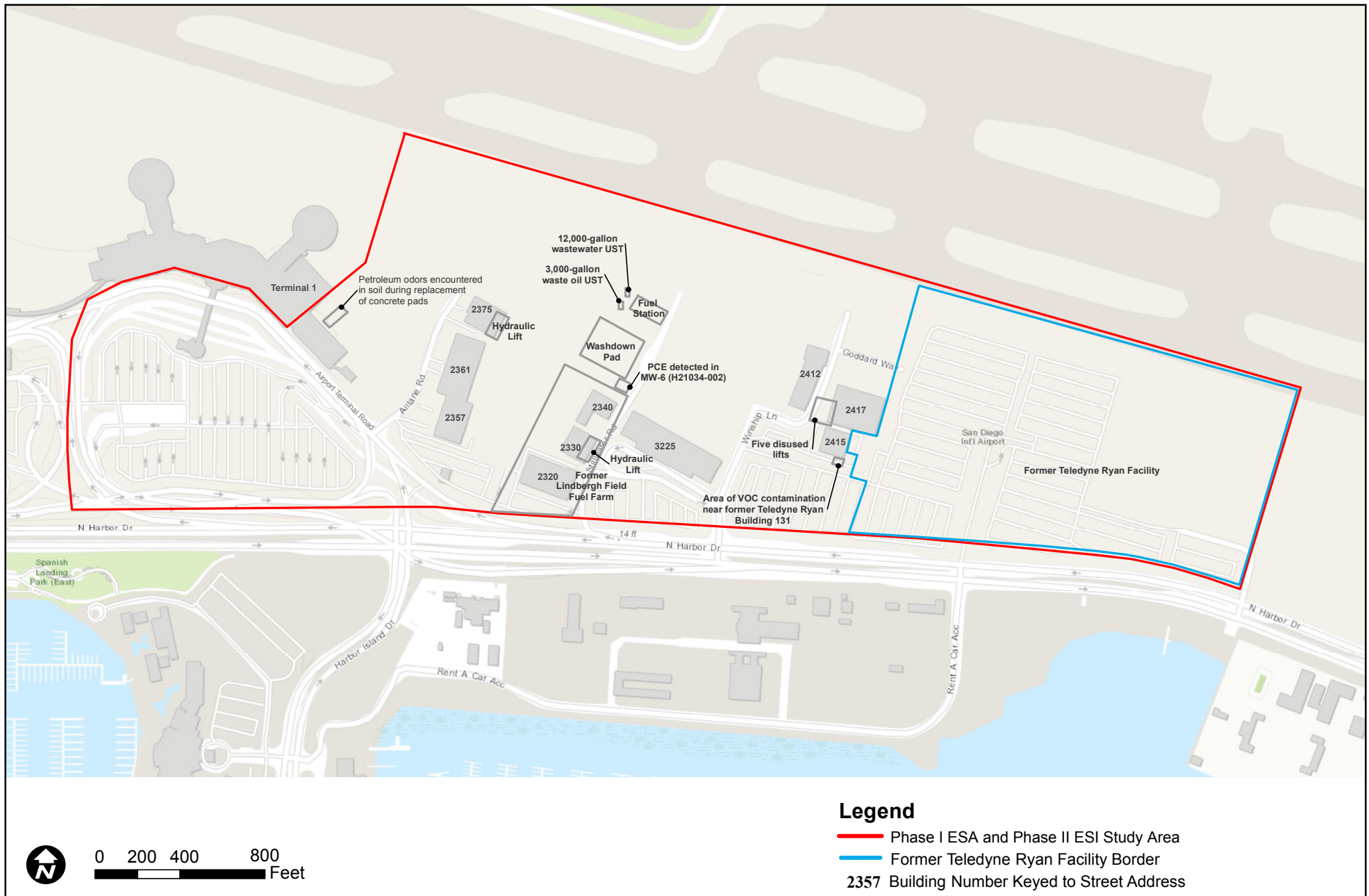
Notify 65 - Listings of all Proposition 65 incidents reported to counties by the SWRCB and the Regional Water Quality Control Board. This database is no longer updated.

WDS - Waste Discharge System Sites. Lists sites which have been issued waste discharge requirements.

ECHO – Enforcement & Compliance History Information. ECHO provides integrated compliance and enforcement information for approximately 800,000 regulated facilities nationwide.

RGA LUST - Recovered Government Archive Leaking Underground Storage Tank. The RGA LUST provides a list of LUST incidents derived from historical databases and includes many records that no longer appear in current government lists. Compiled from Records formerly available from the SWRCB.

Based on a review of the EDR database and historical records, additional site research, and site reconnaissance, several "Recognized Environmental Conditions" (RECs) and "Historical Recognized Environmental Conditions" (HRECs), described below, have been identified within the project site. The RECs and HRECs are in the footprint of the Phase I improvements (i.e., replacement T1, parking structure, and surface improvements) as shown on Figures 3.9-2 and 3.9-3, with the exception of the NTC HREC, which is located west of T2 as shown in Figure 3.9-2. For this EIR, RECs are defined as the presence or likely presence of a hazardous substance or petroleum products in, on, or at a site: (1) because of a release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. HRECs are RECs from a previous release of any hazardous substances or petroleum products that has occurred in connection with the site and has been addressed to the satisfaction of the applicable regulatory authority or meets unrestricted



Source: Amec Foster Wheeler Environment & Infrastructure, Inc., July 26, 2017.



Source: Kleinfelder, October 3, 2017.

residential use criteria established by a regulatory authority, without subjecting the site to any required controls.¹⁹

The following RECs were identified in the Amec Phase I ESA (Figure 3.9-2):²⁰

- One 3,000-gallon waste oil UST and one 12,000-gallon wastewater UST (also referred to as an oil/water separator) are located in the western-most pump island of the fuel pumping station. The 12,000-gallon UST collects stormwater from the fuel rack that potentially contains hydrocarbons from minor drips and spills at the fuel pumps and is thus considered “wastewater.” The USTs were identified as a REC in the Amec Phase I ESA due to limited information that was obtained at the time. However, the tanks are under County of San Diego DEH regulatory oversight and are in full compliance with regulatory requirements. The fueling operations and GAC treatment system are subject to NPDES Permit No. CAS000001 (i.e., the Industrial General Permit for stormwater, as discussed in Section 3.10, Hydrology and Water Quality).
- Several active and inactive hydraulic lifts²¹ were identified. The inactive lifts are currently filled with concrete, with some metal parts still exposed at the surface. Based on the age of the lifts, the lifts contained cylinders of hydraulic fluid used to lift vehicles and platforms. Based on the potential for hydraulic fluid to have been released from the cylinders, the active hydraulic lifts and the abandoned lifts are considered RECs.
- Strong petroleum odors were observed in soil encountered during the replacement of several concrete pads along the western property border of the Phase I study area (which is eastern portion of the existing T1 airfield ramp). The petroleum odors observed in the soil present a REC. Soil sampling conducted as part of the Phase II ESI did not indicate significant concentrations of petroleum nor significant extent of contamination as described in the summary of the Phase II ESI later in this section.

The following RECs were identified in the Kleinfelder Phase I ESA (Figure 3.9-3):

- Three potential groundwater monitoring wells were installed at the site, including two located on the north side of the Terminal 1 building, between the east and west rotundas (referred to as “MW-1 and MW-2”), and one located north of the western end of Terminal 1 West (referred to as “MW-3”). A geophysical survey was conducted to locate the three monitoring wells for the Kleinfelder Phase II ESA.
 - MW-1 and MW-2 were installed in May 1992 as part of an East and West Terminal Upgrade Project. At that time, soil and groundwater samples were collected at the well locations and analyzed for the presence of petroleum hydrocarbons, and benzene, toluene, ethylbenzene, and xylenes (BTEX). These constituents were not

¹⁹ Amec Foster Wheeler Environment and Infrastructure, Inc. Final Phase I Environmental Site Assessment: Project Area 2 – Southside T1RP and Support Facilities, San Diego International Airport, San Diego, California. July 26, 2017.

²⁰ Amec Foster Wheeler Environment and Infrastructure, Inc. Final Phase I Environmental Site Assessment: Project Area 2 – Southside T1RP and Support Facilities, San Diego International Airport, San Diego, California. July 26, 2017.

²¹ A hydraulic lift is a machine that uses a hydraulic force to lift or move objects by exerting pressure on liquid in a piston. Old hydraulic lifts can leak hydraulic fluid from reservoir tanks and pipes onto the soil below.

detected in the samples analyzed. The geophysical survey conducted for the Phase II ESA determined that MW-1 and MW-2 are not buried and are located near the expected locations, which are shown on Figure 3.9-3.

- Limited information is available on MW-3. A letter dated July 14, 1994 from Soltek General Contractor to the Port of San Diego, transmitted a copy of a Well Completion Report associated with relocating a monitoring well on June 29, 1994 at the “East Terminal Baggage Claim” area, which indicates that the well was installed. There is no record of any data of any type, including depth to groundwater, having been collected from the well. Although there is no record of the well being destroyed, MW-3 was not found on the surface. However, the geophysical survey conducted for the Phase II ESA identified two anomalies beneath the concrete surface with similar dimensions to a monitoring well near the expected location of MW-3. The anomalies may indicate the presence of a well or the location of a well that has been destroyed. The location of the anomalies (representing the unconfirmed location of MW-3) is shown on Figure 3.9-3. There are no records suggesting a release or known or suspected contamination at or in the vicinity of the presumed location of MW-3. Soltek General Contractor is a construction company and not an environmental engineering or environmental science company. The participation of Soltek General Contractor in the installation of the well suggests that the well provided geotechnical information such as soil types or depth to groundwater related to construction the company was performing at that time.
- Long-term, on-going fuel spillage in the vicinity of the terminal gates from re-fueling of aircraft, with potential for contamination in the vicinity of storm drains and “slit” trench drains. This is associated with minor spills, typically less than 5 gallons, that occur occasionally, although accidentally, as part of aircraft fueling operations.
- Regional groundwater beneath the site has been impacted by long-term historical use of the area for industrial purposes, including SDIA, former NTC, Marine Corps Recruit Depot (MCRD), and other off-site facilities. As described further below, several on-going and completed remediation efforts have been implemented to address this contamination.

The following HRECs were identified in the Amec Phase I ESA (Figure 3.9-2):²²

- County of San Diego DEH UST removal records were identified for 3225 North Harbor Drive under the name U.S. Air, dated August 30, 1990. U.S. Air was formerly known as American Eagle Airlines and Pacific Southwest Airlines. The 1990 record documents the removal of five USTs (one 10,000-gallon gasoline UST; one 3,250-gallon diesel UST; one 3,250-gallon methyl ethyl ketone (MEK) UST; one 2,250-gallon MEK UST; and one 2,250-gallon waste oil UST). Following the removal of the USTs, ponded product was observed beneath the gasoline UST. The UST removal incident received a No Further Action (NFA)

²² Amec Foster Wheeler Environment and Infrastructure, Inc. Final Phase I Environmental Site Assessment: Project Area 2 – Southside T1RP and Support Facilities, San Diego International Airport, San Diego, California. July 26, 2017.

letter from the County DEH dated July 23, 1991. The NFA letter indicated that the only soil showing evidence of waste oil contamination was located under the waste oil tank and that there was no indication of MEK or chlorinated compound contamination. A total of 70 cubic yards of soil was excavated and transported to Gibson Oil Refinery Company, Bakersfield, California for recycling.

- Previous soil and groundwater contamination at the TDY site, a 44-acre parcel located at 2701 North Harbor Drive in San Diego. Activities at the TDY site included large-scale manufacturing of aircraft and aeronautical equipment. Based on previous investigations conducted at the TDY site, soil and groundwater historically contained various organic and inorganic compounds at concentrations above background levels.²³ Remedial activities included treatment of soil, groundwater, and soil gas. A post-remedial risk assessment prepared by GeoSyntec for TDY Industries indicated that no additional remediation is warranted because (1) cleanup levels for all waste constituents was attained at all monitoring points and throughout the zone affected by the waste constituents, including any portions thereof that extend beyond the TDY site boundary; (2) illicit waste discharges related to TDY's historical activities into and through the storm water conveyance system (SWCS), off-site municipal sewer Municipal Separate Storm Sewer Systems (MS4s), and/or receiving waters at the site have been prevented or eliminated; and (3) all media (soil, groundwater, and soil gas) are protective of all on-site receptors based on a final site-wide post-remediation risk assessment.²⁴ As part of this investigation, soil gas surveys were performed in the western and eastern portions of the former TDY site, which identified two areas with residual soil gas impacts in excess of risk-based goals, including an area in the western portion of the former TDY site, east of the proposed new T1 footprint in an area that would be used for aircraft apron and aircraft overnight parking. Remediation of the soil gas on the western portion of the former TDY site was addressed through in-situ soil vapor extraction, and the impacts on the eastern side of the former TDY site were addressed through ex-situ excavation and treatment. Following remediation, testing indicated that soil gas concentrations were reduced to below remedial goals.²⁵ As a result, the remediation site was closed on February 13, 2015 by the San Diego Regional Water Quality Control Board (RWQCB).²⁶
- Previous contamination at the former Lindbergh Field Fuel Farm, located west of the former Commuter Terminal at 2320, 2330, and 2340 Stillwater Road. The fuel farm was in operation from 1952 until 1997 when it was decommissioned. Decommissioning of the Lindbergh Field Fuel Farm was followed by soil and groundwater remediation activities. Several cases were consolidated and closed in 2002 by the County DEH.

²³ Amec Foster Wheeler Environment and Infrastructure, Inc. Final Phase I Environmental Site Assessment: Project Area 2 – Southside T1RP and Support Facilities, San Diego International Airport, San Diego, California. July 26, 2017.

²⁴ Geosyntec. Cleanup and Abatement Completion Report Airport/Former TDY Site, 2701 North Harbor Drive San Diego, California SL2090541880: Talo. Prepared for TDY Industries, LLC. December 12, 2014.

²⁵ Geosyntec. Cleanup and Abatement Completion Report Airport/Former TDY Site, 2701 North Harbor Drive San Diego, California SL2090541880: Talo. Prepared for TDY Industries, LLC. December 12, 2014.

²⁶ California Regional Water Quality Control Board - San Diego Region. Letter from David W. Gibson, Executive Officer to Mr. Edgar Bertaut. No Further Action for Wastes Discharged to Land, Former Teledyne Ryan Aeronautical Site, 2701 North Harbor Drive, San Diego, CA (Site ID - #2090500). February 13, 2015.

However, it was determined that approximately 395 cubic yards of contaminated soil remained in an area that was inaccessible. This was because of access limitations due to North Harbor Drive and the presence of utilities.

- A former 32,500 gallon AST in the former Lindbergh Field Fuel Farm that has undergone extensive remediation, including excavation of contaminated soils.
- Detection of perchloroethylene (PCE) in groundwater in a well installed northwest of the fuel station. Based on historical use of the site as a commercial airport and designation of groundwater in the area as having no beneficial uses, the incident was administratively closed by County DEH in 2013.

The following HREC was identified in the Kleinfelder Phase I ESA (Figure 3.9-3):

- Three USTs were reportedly removed from the area north-northwest of Gate 7 during apron reconstruction activities in 1992/1993. One of the USTs was removed with no reported contamination; thus, no formal case was opened. Two 300-gallon diesel USTs and associated soil contamination were removed for which County DEH issued case closure.

The following HREC is within the proposed project construction area (T2-West modification), but outside of the area reviewed for the Phase I ESA:

- The former NTC Inactive Landfill is a 52-acre site formerly used by the NTC and MCRD from the 1940s to 1971 as a municipal landfill for consumer waste, burn ash and construction debris. The site has undergone extensive remediation and was developed as part of the T2-West “Green Build” development. The western-most portion of the proposed project site (slated for construction during Phase 2) is part of the former NTC Inactive Landfill. SDIA has removed the waste and a remediation and closure plan was implemented. An area to the north of the proposed project construction area (Parcel A as shown on Figure 3.9-1) continues to be subject to monitoring under oversight of the San Diego RWQCB, but the remainder of the site has been terminated from enrollment in RWQCB General Orders No. R9-2012-0001 and R9-2012-0002, which releases the site from any further permitting or monitoring requirements.^{27,28}

Based on recommendations in the Amec Phase I ESA, a Phase II ESI²⁹ subsurface investigation was conducted to test for the presence of contaminants in soil and groundwater that included the areas identified as RECs and HRECs in the Phase I ESA. Samples were taken from locations where

²⁷ Ninyo and Moore. Annual Site Conditions Certification Report. Parcel A of the Naval Training Center (NTC) Waste Disposal Site (aka Former Site 1 – Old MCRD Landfill; aka Old MCRD Refuse Disposal Area) 3225 Harbor Drive, San Diego, California 92101, Geo Tracker Global ID No. L10004197278, San Diego Water Board (Region 9) Case #9 000000823/16591-1, SWIS No. 37-CR-0058, Reference Code 240135: K Schwall. Prepared for San Diego County Regional Airport Authority. October 30, 2018.

²⁸ California Regional Water Quality Control Board - San Diego Region. Letter from David W. Gibson, Executive Officer to Mr. Richard Gilb, Environmental Affairs Manager, San Diego County Regional Airport Authority. Notice of Termination of Enrollment in General Order No. RS-2012-0001, and General Order No. RS-2012-0002: Notice of Enrollment in General Order No. RS-2012-0003 for the Parcel A portion of the Naval Training Center/Marine Corps Recruit Depot Landfill, San Diego. March 1, 2018.

²⁹ Amec Foster Wheeler Environment & Infrastructure, Inc. Final Phase II Environmental Site Investigation Report for Project Area 2 – Southside T1RP & Support Facilities, San Diego International Airport, San Diego, California. February 7, 2018.

previous use and the Phase I ESA indicated contamination was most likely. Soil samples were analyzed for total petroleum hydrocarbons (TPH), volatile organic compounds, including oxygenates (VOCs), and California Administrative Manual (CAM) Title 22 Metals. A subset of the soil samples was also analyzed for semivolatile organic compounds (SVOCs) and polychlorinated biphenyls (PCBs). Grab groundwater samples were collected at 10 of the borings and analyzed for TPH and VOCs. A subset of the groundwater samples were also analyzed for SVOCs and PCBs. Additional sampling locations were selected to assess the overall site condition in areas not previously investigated.

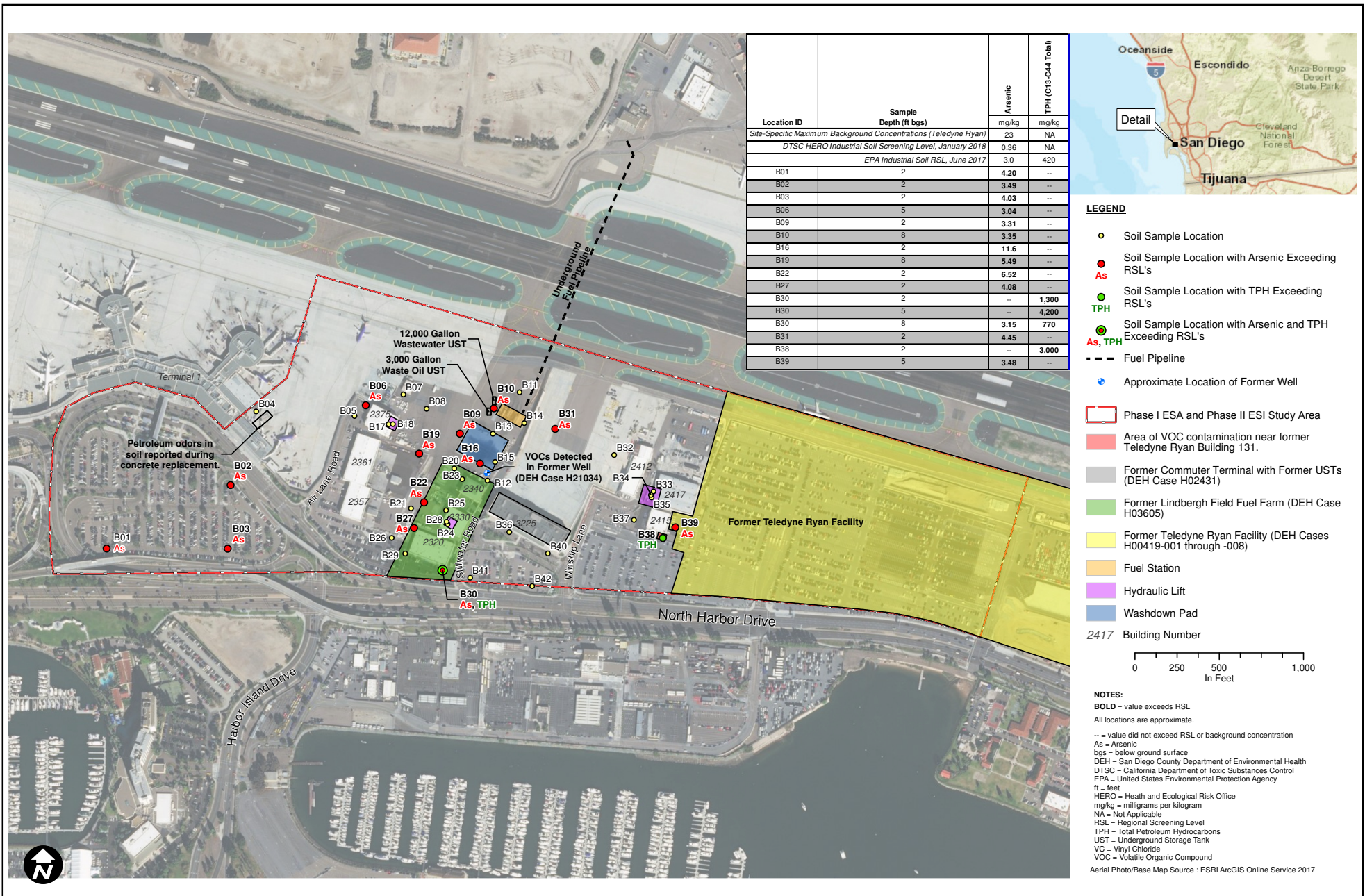
As part of the Phase II ESI, a total of 126 soil and 10 groundwater samples were collected from 42 borings across the site. Based on the sampling results, the Phase II ESI identified elevated TPH in soil and groundwater at and/or near the former Lindbergh Field Fuel Farm (south of Building 2320). TPH concentrations at this location exceed regional screening levels (RSLs) for soil.³⁰ Elevated concentrations of TPH were also detected in groundwater; however, because there are no Maximum Contaminant Levels (MCLs) for TPH in groundwater, a direct comparison with regulatory action levels could not be made. Only low levels of VOCs typical of petroleum hydrocarbon contamination were detected in the groundwater samples at this location, at concentrations well below applicable MCLs, if available. Other areas within the former Lindbergh Field Fuel Farm may be contaminated as well.

The soil data indicate that other areas of the site contain low levels of TPH (below the RSL); however, such contamination is likely limited in extent (i.e., “hot spots”). With the exception of isolated detections slightly above the laboratory reporting limits, no VOCs, SVOCs, or PCBs were found in the soil at the site. In all cases, the concentrations detected were less than RSLs.

Arsenic was the only metal detected in the soil samples at concentrations above its established RSL. Because arsenic was detected in most of the samples throughout the site, including those taken from locations not used for airport operations, its presence in soil is likely not the result of previous site use, but rather represents background conditions of the area as a whole. Figure 3.9-4 shows soil sample locations and identifies those soil samples with RSL exceedances of TPH and/or arsenic.

Groundwater was present beneath the site at depths between 8 to 10 feet below ground surface (bgs) and has been historically as high as 5 feet bgs. A number of VOCs were detected in groundwater at concentrations above their respective MCLs in the area north of the washdown pad, at the abandoned hydraulic lifts (east of Building 2417), and in the area of VOC contamination near former TDY Building 131 (south of Building 2415). Figure 3.9-5 shows soil boring with groundwater sample locations and identifies those groundwater samples with MCL exceedances.

³⁰ Screening levels (SLs) represent risk-based concentrations derived from standardized equations combining exposure information assumptions with U.S. Environmental Protection Agency (USEPA) toxicity data. Regional screening levels (RSLs) are determined by the USEPA region where a particular project is located, which in the case of projects located in California is USEPA Region 9. Regional screening levels help identify areas, contaminants, and conditions that may warrant further investigation and, if warranted, remediation. Generally, at sites where contaminant concentrations fall below screening levels, no further action or study is warranted.



Source: Amec Foster Wheeler Environment & Infrastructure, Inc. February 18, 2018.

The Kleinfelder Phase II ESA was conducted to evaluate the RECs and HREC identified in the Kleinfelder Phase I ESA for the purposes of redevelopment. Each soil and groundwater sample collected was analyzed for TPH, CAM Title 22 Metals, VOCs, SVOCs and PCBs. The Kleinfelder Phase II ESA determined that soil and groundwater beneath the study area has been impacted by TPH and SVOCs. TPH and SVOCs in soil were widespread throughout the area, but were below the RSL. TPH and SVOCs in groundwater were isolated to the area around the former USTs (north of the existing T1 East Rotunda). The SVOC detected in groundwater did not exceed the MCL and, as described above, there are no TPH MCLs. The sources of the soil and groundwater contamination were determined to likely be from former USTs and surface leaks. Twelve total metals in soil, include arsenic, were detected above laboratory reporting limits but no metals exceeded the California Code of Regulations (CCR) Title 22 total threshold limit concentration (TTLC) or 10 times the soluble threshold limit concentration (STLC) California hazardous waste limits. Additionally, as the concentrations were generally consistent among the various sampling locations, the Phase II ESA concluded that the concentrations of metals likely represent regional background concentrations. Constituent detections are shown on Figure 3.9-6.

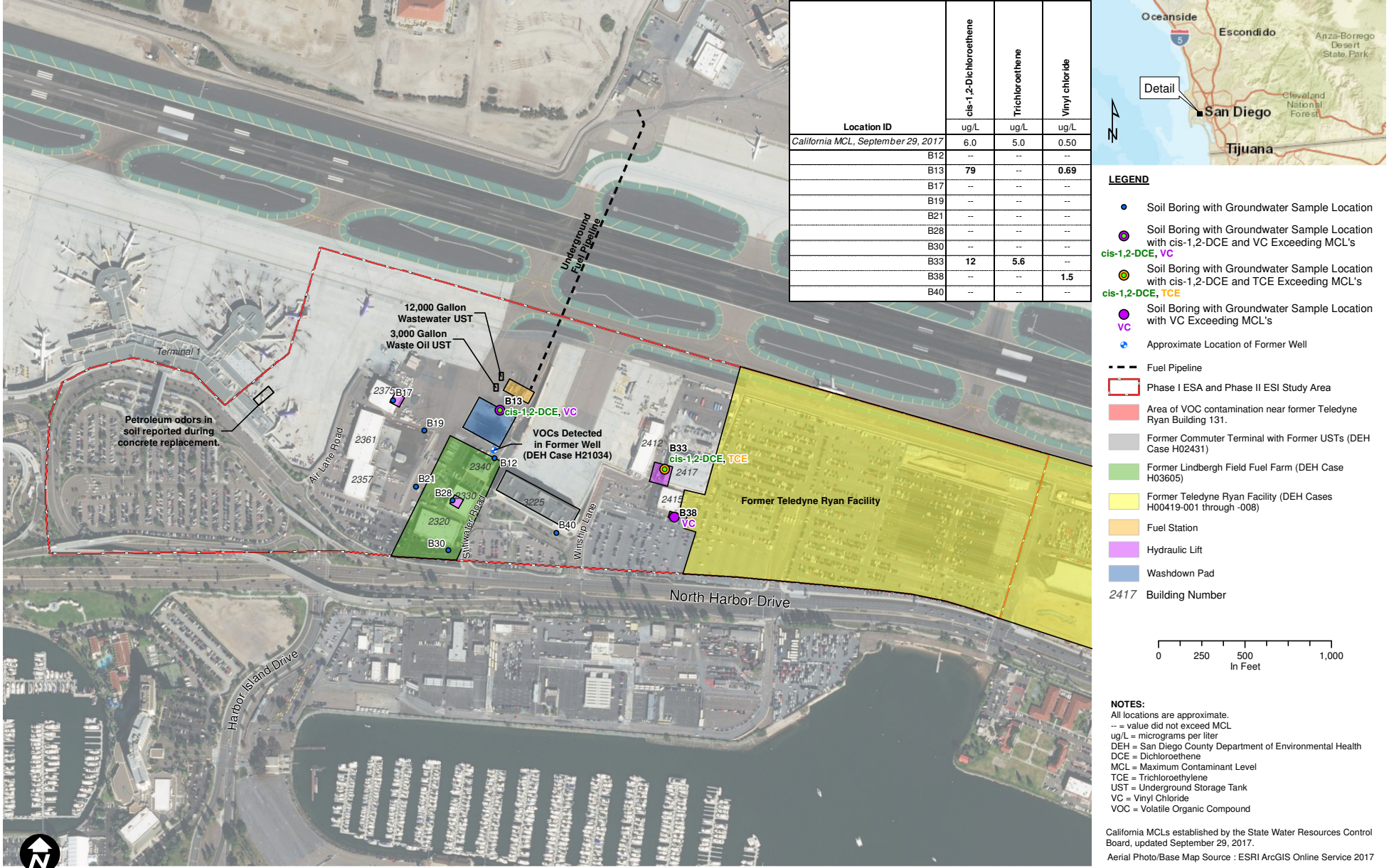
Hazardous Building Materials

As described in Section 3.9.3 above, SDCRAA has an Asbestos Operations and Maintenance Plan that includes periodic inspections to document the condition of known ACM and to make repairs, if necessary. The most recent inspection report, the 2019 Annual Reinspections, has identified ACM in various structures throughout SDIA, including T1, T2-East, the former Commuter Terminal, and several cargo and maintenance buildings that would be removed under the proposed project. Typically, the ACM has been found in materials such as the floor tiles, mastic, and stucco.³¹ The ACM becomes a health hazard only when asbestos fibers are released into the air, where they could be inhaled or ingested. Asbestos does not present a hazard if it is not disturbed, is properly covered, or if the fibers are bound as in floor tiles.

Additionally, a hazardous materials survey³² was conducted of accessible areas of the interiors and exteriors of T1 to assess the presence, location, and quantity of accessible suspected hazardous building materials that may represent a potential worker safety hazard if disturbed, and/or may require special handling and/or disposal as hazardous waste as part of proposed building demolition. The T1 Hazardous Building Materials Survey identified ACMs, lead-containing materials (LCMs), mercury-containing equipment, PCB-containing equipment, lead-containing batteries, chlorofluorocarbon (CFC)-containing equipment, and Universal Wastes (e.g., fluorescent light tubes) at various locations. Such materials are also expected to be found at other buildings/portions of buildings to be demolished under the proposed project, including T1, T2-East, and the former Commuter Terminal, which are known to have ACMs as identified above.

³¹ Tetra Tech, Inc. 2019 Asbestos Reinspections. Prepared for San Diego County Regional Airport Authority, Environmental Affairs. March 21, 2019. Available: <http://www.san.org/Portals/0/Documents/Environmental/2019%20Annual%20Asbestos%20Reinspections.pdf>.

³² Kleinfelder. Report of Limited Hazardous Building Material Survey, Terminal 1, San Diego International Airport, San Diego, California. Kleinfelder Project No. 20182081.001A. May 29, 2018.

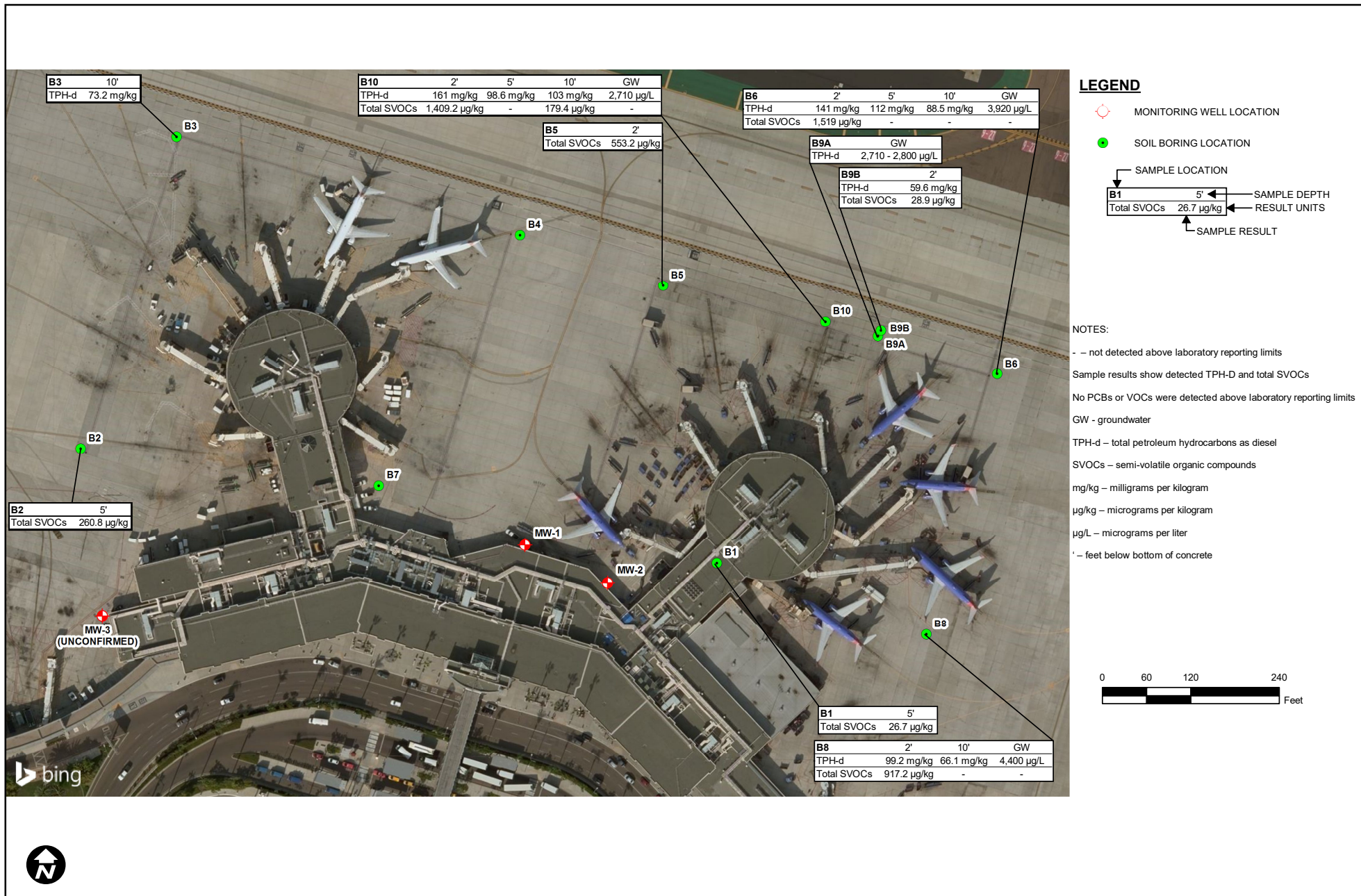


Source: Amec Foster Wheeler Environment & Infrastructure, Inc. February 18, 2018.

San Diego International Airport
Airport Development Plan

AMEC PHASE II ESI GROUNDWATER SAMPLES WITH MCL EXCEEDANCES
September 2019 | Recirculated Draft EIR

Figure 3.9-5



Source: Kleinfelder, February 15, 2018.

Schools within 0.25 Mile of Project Site

There is one school located within 0.25 mile of the Airport boundaries, although it is approximately 0.5 mile from the construction area. Montessori School of San Diego is located at approximately 0.22 mile to the northeast of the Airport boundary, on the other side of Interstate 5 (I-5) from SDIA.

Emergency Evacuation Route

North Harbor Drive adjacent to SDIA and Laurel Street are identified tsunami evacuation routes on the City of San Diego Tsunami Inundation Map³³ and County of San Diego Tsunami Evacuation Map that encompasses the City of San Diego.³⁴

3.9.5 Thresholds of Significance

The following six significance criteria for hazards and hazardous materials are derived from Appendix G of the State CEQA Guidelines. Under these criteria, a proposed project would result in significant impacts associated with hazards or hazardous materials impacts if it would:

- Impact 3.9-1** 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 3.9-2** Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
- Impact 3.9-3** Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
- Impact 3.9-4** Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment.³⁵
- Impact 3.9-5** 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, result in a safety hazard or excessive noise for people residing or working in the project area.
- Impact 3.9-6** Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Note that Appendix G of the State CEQA Guidelines also includes a significance criterion for impacts relating to wildland fires. Because the proposed project is an existing public airport surrounded by development and is not near wildlands, this criterion was not evaluated in this EIR.

³³ City of San Diego. Tsunami Inundation Map. No Date. Available: <https://www.sandiego.gov/sites/default/files/legacy/ohs/pdf/tsunamimap.pdf>.

³⁴ County of San Diego. Tsunami Evacuation Map. No Date. Available: http://www.readysandiego.org/content/dam/oesready/en/tsunami/Map_SD_SanDiegoCityFINALv3.pdf.

³⁵ California Government Code Section 65962.5 – Requires the DTSC to compile and maintain lists of potentially contaminated sites throughout the state.

3.9.6 Project Impacts

3.9.6.1 Impact 3.9-1

Summary Conclusion for Impact 3.9-1: The proposed project could 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; however, with implementation of recommended mitigation measures, the impact would be reduced to a *less than significant impact* for construction and operation.

3.9.6.1.1 Construction

Releases of any hazardous materials are subject to a complex set of regulatory and reporting requirements, including notification to the County DEH and the state and County OES. During construction, contractors would be held responsible for reporting any discharges of hazardous materials or other similar substances (in amounts above their reportable quantities). Inadvertent releases of hazardous materials on construction sites are typically localized and would be cleaned up in a timely manner. Further, potential releases of hazardous substances during construction would be addressed through the EPCRA, which is administered in California by the State Emergency Response Commission, the Hazardous Material Release Response Plans and Inventory Law, and the California Hazardous Waste Control Law, which would govern proper containment, spill control, and disposal of hazardous waste generated during construction.

Additionally, as discussed in Section 3.10, Hydrology and Water Quality, and Section 3.8, Geology and Soils, the use of construction BMPs implemented as part of a Stormwater Pollution Prevention Plan (SWPPP), as required by the NPDES General Construction Permit, would minimize the potential adverse effects to the general public and environment. Construction contract specifications would include strict on-site handling rules to keep construction and maintenance materials, including hazardous materials, out of groundwater and soils. BMPs may include, but are not limited to:

- Establish a dedicated area for fuel storage and refueling activities that includes secondary containment protection measures and spill control supplies;
- Follow manufacturers' recommendations on use, storage, and disposal of chemical products used in construction;
- Avoid overtopping construction equipment fuel gas tanks;
- During routine maintenance of construction equipment, properly contain and remove grease and oils; and
- Properly dispose of discarded containers of fuels and other chemicals.

Compliance with regulations, including implementation of BMPs, would limit both the frequency and severity of potential releases of hazardous materials.

As discussed in Section 3.9.4, past contamination at the project site, though remediated, still exists at several locations. Specifically, a number of soil samples taken at the site exceed the RSLs for TPH

and arsenic,³⁶ and several groundwater samples exceed MCLs for VOCs (see Figures 3.9-4 and 3.9-5). Therefore, the project's ground disturbing activities could encounter contaminated soils and/or contaminated groundwater.³⁷ Further, in addition to the locations identified in the Amec Phase II ESI and Kleinfelder Phase II ESA where samples indicate that soil and groundwater contamination exceeds regulatory limits, there is the potential for contaminated soils to be unexpectedly encountered in other areas of the project site. As shown on Figure 3.9-1, a portion of the project area near T2-East is proposed for surface improvements (i.e., aircraft apron demolition and reconstruction) and T2-East modifications, but is not within the boundaries of recent study areas. The historical and existing uses in this area are similar to the historical and existing uses to the east in the area assessed in the Amec and Kleinfelder (Phase I and Phase II) studies, and there is a potential that contaminated groundwater and soils may be encountered, similar to the contamination identified in the Amec and Kleinfelder (Phase I and Phase II) studies. There is also the potential that a groundwater monitoring well could be encountered.

Areas with contamination above acceptable limits would require encapsulation, removal and disposal, or other remediation measures set forth in a site-specific treatment plan and as required by applicable federal, state, and local laws. Encapsulation of contaminated soils is SDCRAA's anticipated method to address contamination; however, the specific actions would be determined in coordination with the appropriate federal, state, county, or city agencies, which, depending on the nature of contamination, could include the County DEH, San Diego RWQCB, and/or DTSC. The remediation activities would be subject to stringent oversight by the applicable agency/agencies, and they would take place until regulatory requirements are met and closure is granted in accordance with all applicable regulations as identified in Section 3.9.3. Should regulatory agencies require removal of contaminated soils instead of encapsulation, the contaminated soils would be disposed of in accordance with federal, state, and local requirements, which could include disposal as fill or daily cover material at a local landfill permitted to accept such wastes, such as Sycamore, Otay, or Miramar landfills, which accept certain types of contaminated soils (i.e., petroleum hydrocarbon-impacted soils with hydrocarbon concentrations below specified limits).

ACMs are present in some of the structures to be demolished and/or modified, including T1, T2-East and the former Commuter Terminal. Additionally, material such as LBP are present. The demolition of structures during construction could release LBP particles and/or asbestos fibers to the air, creating a significant hazard to the public and workers. ACMs would be abated in compliance with SDAPCD Rule 1206, as well as all other applicable state and federal rules and regulations. This includes implementation of dust control and abatement procedures to ensure that no "visible emissions" (i.e., dust) are discharged to the outside air during collection/handling of ACMs as required by SDAPCD Rule 1206. Abatement of LBP, if required, would be conducted in compliance with the City of San Diego Lead Hazard Prevention and Control Ordinance and lead safe work practices would be implemented. This would include implementation of required safe handling and disposal practices, such as preparing the worksite to prevent the release of lead-contaminated dust and lead paint contaminants, to limit worker and environmental risks.

³⁶ As described in Section 3.9.4, arsenic concentrations are considered representative background conditions of the overall area and are not associated with past uses.

³⁷ Amec Foster Wheeler Environment & Infrastructure, Inc. Final Phase II Environmental Site Investigation Report for Project Area 2 – Southside T1RP & Support Facilities, San Diego International Airport, San Diego, California. February 7, 2018.

Compliance with existing federal, state, and local regulations and routine precautions would reduce the potential for hazards to the public or the environment through the routine transport and disposal of hazardous building materials. As discussed further in Section 3.15, Utilities, while SDIA construction contracts typically identify solid waste recycling and other requirements, the contractors select the facilities used for solid waste disposal/recycling. Disposal of hazardous building materials would occur in accordance with applicable requirements, which could include at landfills permitted to accept such wastes, such as Sycamore, Otay, or Miramar landfills that are authorized to accept asbestos.

Remediation of contamination has the potential to expose workers to hazardous materials or substances. Worker safety and health are regulated by the federal OSHA and CalOSHA. OSHA and CalOSHA standards establish exposure limits for certain air contaminants. Exposure limits define the maximum amount of hazardous airborne chemicals to which an employee may be exposed over specific periods. When administrative or engineering controls cannot achieve compliance with exposure limits, protective equipment or other protective measures must be used.

When employees are involved in hazardous waste operations, employers (including SDCRAA and its tenants and contractors) are also required to provide a written health and safety program, worker training, emergency response training, and medical surveillance, as required by CalOSHA standards for hazardous waste operations (Title 8 CCR Section 5192). This includes the recommendation cited in Appendix C of Title 8 CCR Section 5192 that professional safety personnel, such as Certified Safety Professionals, Certified Industrial Hygienists or Certified Safety Engineers, be used to develop and implement the program.

Compliance with regulations, including implementation of BMPs and coordination with regulatory agencies on remediation activities, would limit both the frequency and severity of potential releases of hazardous materials.

Notwithstanding the existing federal, state, and local regulatory programs noted above that generally serve to minimize reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, there are certain known or potential areas of soil and groundwater contamination at the project site that are identified in the Phase II studies, and hazardous building materials identified in the Hazardous Building Materials Survey as warranting specific measures to implement during site development in order to address such contamination.

Given that those measures are not currently a part of the proposed project, it is concluded that construction of the ADP, as currently proposed, poses a potential for upset and accident conditions involving the release of hazardous materials into the environment, which would be a ***significant impact***.

3.9.6.1.2 Operations

The proposed project would continue the existing aviation-related land uses and would involve the generation, use, and storage of hazardous materials in quantities and types that are similar to existing conditions. Further, the use, storage, and handling of such hazardous materials would continue to occur in compliance with applicable regulations and standards. Thus, the proposed

project would not create additional long-term risks to the public or the environment from these substances.

As described in Section 3.9.4 above, remediation has occurred at the TDY site, a portion of which is at the eastern edge of the project site and the NTC site, a portion of which is at the western edge of the project site. Within those portions of the project site that were included in the TDY site and NTC site remediation, soil and groundwater contamination exceeding the RSLs and MCLs, respectively, are not expected to be encountered. However, as described in Section 3.9.6.1.1 above, there are locations near the footprint of the proposed new T1 where soil and groundwater contamination has been identified that exceeds the RSLs and MCLs, respectively (see Figures 3.9-4 and 3.9-5), and an area near T2-East, where no recent studies have been conducted and where soil and groundwater contamination may be encountered. Such contamination would be required to be encapsulated or undergo other remediation/treatment/disposal activities during construction under regulatory oversight of the appropriate regulatory agency.

Vapor intrusion occurs when there is a migration of vapor-forming chemicals from a subsurface source into an overlying building (i.e., soil gas). The Phase II ESI recommended a review of the vapor intrusion investigation for the former TDY site and recommended the completion of a soil vapor survey with accompanying human health risk assessment. As described in Section 3.9.4 above, soil gas detected at the former TDY site during the vapor intrusion investigation was remediated to levels below regulatory thresholds. However, based on the information that soil gas vapor was present at the former TDY site and the Phase II ESI recommendation for an additional survey and human health risk assessment, it is not possible to conclude that soil vapor gas is not present at the site of the proposed new T1, which could pose a risk of migrating into the building and accumulating in levels that could pose a risk of health effects. As such, operation of the proposed project could result in a significant impact relative to potential vapor intrusion.

The proposed project includes the expansion of the existing central utility plant (CUP). Operations at the existing facility are highly regulated to prevent incidents and accidents and the CUP complies with all relevant federal, state, and local safety regulations to minimize the risk of an upset. This includes compliance with regulations that address safety and design features, operational procedures, handling practices, employee training programs, emergency response procedures, and auditing and inspection programs. By complying with these regulatory and operational conditions, the likelihood of an accidental release would be low. Therefore, the consequences of an upset at the expanded CUP would be similar to those under baseline conditions. Because the expansion of the CUP would not substantially increase the likelihood or consequences of an incident, the risk of upset would be less than significant.

As described above, proposed project operations would comply with all relevant regulations pertaining to the handling of hazardous materials; however, based on existing information, there is the potential for a significant hazard to the public through reasonably foreseeable upset conditions involving the release of hazardous materials into the environment, specifically as related to the potential for soil vapor gas intrusion into the proposed new T1 building. This would be a **significant impact** for operations.

3.9.6.1.3 Mitigation Measures

MM-HW-1: Preparation of Hazardous Materials Management Plan (HMMP): Prior to site excavation activities and/or construction-related dewatering at the project site, a Hazardous Materials Management Plan (HMMP) shall be prepared and include the following:

- Delineation of roles and responsibilities, including those of the Contractor and those of SDCRAA;
- Procedures for identification, initial screening, and notification, of contaminated soil and/or groundwater encountered during site excavation;
- Procedures to secure/cordon-off area known to be or suspected of being contaminated;
- Procedures for decontamination of personnel and equipment leaving the secured area known to be or suspected of being contaminated;
- Procedure for assessing the nature and extent of contamination, and the approach to managing the contaminated soil/groundwater, including excavation/pumping, handling, storage, transport, and disposition (i.e., treatment/disposal); and
- Site-specific Health and Safety Plan for the safety and protection of construction workers, airport employees, and the general public from exposure to impacted soil, dust, and groundwater during construction activities.

It is anticipated that there will be a HMMP developed for the course of ADP construction, with site-specific Health and Safety Plans developed that are tailored to the specific characteristics of individual construction contracts, but all with the same purpose of providing a management plan consistent with the ADP HMMP that will adequately address known or potential contaminated soils or groundwater. Based on information presented in the 2018 Amec Phase II ESI and 2018 Kleinfelder Phase II ESA, the site-specific Health and Safety Plans for the following areas (as identified on Figures 3.9-2 through 3.9-5 of the Recirculated Draft EIR) will need to include management measures for the specific issues of concern identified therein:

- *South Side of Building 2320:* Elevated levels of total petroleum hydrocarbons and metals were detected in samples from Soil Boring B30. The Health and Safety Plan for this area shall account for the presence of impacted soil and groundwater in the vicinity of this boring location and provide measures for segregation, containment, and disposal of impacted materials, as appropriate.
- *West Side of Building 2417, South Side of Building 2415, and North Side of Washdown Pad:* Elevated levels of volatile organic compounds were detected in groundwater samples from these areas. The Health and Safety Plans for these areas shall account for the presence of contaminated groundwater and provide measures for segregation, containment, and disposal of impacted materials, as appropriate.

- *North of Terminal 1 East Rotunda:* Elevated levels of total petroleum hydrocarbons and semi-volatile organic compounds were detected in groundwater and soil samples from this area. The Health and Safety Plan for this area shall account for the presence of impacted soil and groundwater and provide measures for segregation, containment, and disposal of impacted materials, as appropriate.

This measure is considered feasible.

MM-HW-2: Existing Groundwater Monitoring Wells: In conjunction with the demolition of Terminal 1, the following measure shall be completed:

- The suspected location of monitoring well MW-3 should be investigated to confirm the presence or absence of the well. All monitoring wells located within proposed project development areas or that could otherwise be disturbed by project construction should be properly destroyed in accordance with the requirements of, and be subject to permit approval by, the County Department of Environmental Health. Should any monitoring wells associated with an open case be disturbed, the lead agency overseeing the open case shall be notified and any requirements identified by the agency associated with well disturbance shall be adhered to. This measure is considered feasible.

MM-HW-3: Hazardous Building Materials Abatement: Prior to building demolition, the following activities shall be implemented:

- SDCRAA shall retain a State of California-licensed asbestos/lead abatement contractor to perform abatement of asbestos containing material (ACM), asbestos containing construction material (ACCM), lead-based paint (LBP), or lead-containing paint (LCP) that could potentially be disturbed.
- Prior to the initiation of abatement or demolition work, the abatement or demolition contractor must complete the Notification of Demolition or Asbestos Removal form and submit it to the County of San Diego Air Pollution Control District (SDAPCD) in compliance with Rule 1206 at least 10 business days before the start of abatement or demolition. SDAPCD will return the form, with a “notification number” added, to the abatement or demolition contractor, depending on who submitted the form.
- The asbestos/lead abatement contractor shall provide written notification to the local CalOSHA district office regarding its “Intent to Conduct Asbestos Related Work” and/or “Intent to Conduct Lead-Related Work.” These notifications should be submitted at least 24 hours in advance of performing the respective asbestos-related or lead-related work.
- Other potentially hazardous building materials, including and mercury-containing equipment, polychlorinated biphenyl (PCB)-containing equipment, lead-containing batteries, chlorofluorocarbon (CFC)-containing equipment, and Universal Wastes (e.g., fluorescent light tubes) will require segregation and may

require further testing and analysis to determine whether they meet the definition of a hazardous waste in California and can be managed under the Universal Waste Rules. Hazardous wastes should only be handled by properly trained workers.

- Notification should be provided to contractor and subcontractor personnel as to the presence of ACMs, ACCMs, LBPs, LCPs, and other hazardous building materials at the site.

This measure is considered feasible.

MM-HW-4: Vapor Intrusion Assessment: In conjunction with building design of the new T1, the following measure shall be completed:

- A soil vapor survey with accompanying human health risk assessment shall be prepared for the area proposed for the new T1 building. If found warranted by the results of that assessment, remediation, such as in-situ soil vapor extraction (SVE) or ex-situ excavation and treatment, shall be implemented to reduce levels to below site-specific risk-based concentrations (RBC), or a vapor intrusion mitigation system shall be incorporated into the design of the new T1 building to ensure that indoor air concentrations do not exceed regulatory thresholds. As part of that effort, the 2014 vapor intrusion investigation for the former Teledyne Ryan Facility site shall be reviewed as it pertains to future buildings within the subject area. This measure is considered feasible.

3.9.6.1.4 Significance of Impact After Mitigation

With implementation of Mitigation Measures MM-HW-1, MM-HW-2, and MM-HW-3 related to construction and MM-HW-4 related to operations, the impacts of the proposed project would be reduced to a level that is *less than significant impact* for construction and operations.

3.9.6.2 Impact 3.9-2

Summary Conclusion for Impact 3.9-2: The proposed project could create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during construction; however, with implementation of recommended mitigation measures, the impact would be reduced to a *less than significant impact* for construction. This would be a *less than significant impact* for operation.

3.9.6.2.1 Construction

Construction activities associated with the proposed project include the demolition of several structures, including T1 and portions of T2 and paved area, removal of debris and landscape, excavation, possible fill replacement and grading of the project site for foundation and utilities, construction of new structures, and installation of new paved areas, roadways, and landscaping. These construction activities would involve the use of hazardous materials associated with use of construction equipment on-site, including vehicle fuels (both gasoline and diesel), oils, solvents, and transmission fluids. The types and amounts of hazardous materials would vary according to the nature of the activity but would be used in quantities that are typical of the construction industry. These types of materials are not acutely hazardous, and the construction contract

documents would require these materials be stored, handled, and disposed of in accordance with state and local regulations and manufacturers' instructions. Therefore, no hazard to the public would occur.

Contaminated soil is known to exist at the project site and would be addressed during construction of the proposed project. The contaminated soils could be encapsulated in place beneath the apron/pavement and the proposed new T1. Encapsulation would provide a protective barrier and prevent exposure by human receptors to contaminated soils, as well as prevent soil erosion or stormwater infiltration. While encapsulation is the preferred method, the contaminated soils may be alternatively excavated and removed during or prior to site development. The removal, handling, storage, transport, and treatment/disposal of such soil would be subject to state and federal requirements related to hazardous waste, such as the federal Hazardous Materials Transportation Act and the Occupational Safety and Health Act described in Section 3.9.3.1, and the state Hazardous Waste Control Law described in Section 3.9.3.2. Compliance with these requirements and routine precautions would reduce the potential for hazards to the public or the environment through the routine transport and disposal of contaminated soils. Certain types of contaminated soils are accepted, as fill or daily cover materials, at landfills located in San Diego County, including Otay, Miramar, and Sycamore landfills.

As discussed under Impact 3.9-1 above, hazardous building materials, such as ACMs and lead-based paint would be encountered during building demolition and renovation. This material could be disposed of at a landfill authorized to accept such wastes by the RWQCB, such as Sycamore, Otay, or Miramar landfills. For additional information on landfills and landfill capacity in San Diego County, see Section 3.15, Utilities. Compliance with existing federal, state, and local regulations and routine precautions for abatement and disposal of such materials would reduce the potential for hazards to the public or the environment through reasonably foreseeable upset and accident conditions.

Notwithstanding the existing federal, state, and local regulatory programs noted above that generally serve to address impacts associated with the routine transport, use, and disposal of hazardous materials, there are certain known or potential areas of contamination at the project site that are identified in the Amec Phase II ESI and Kleinfelder Phase II ESA and T1 Hazardous Building Materials Survey as warranting specific measures related to the management of hazardous materials during construction. Given that those measures are not currently a part of the proposed project, it is concluded that construction of the ADP, as currently proposed, poses a potential for a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, which would be a ***significant impact***.

3.9.6.2.2 Operations

Under the proposed project, the existing aviation-related land uses would continue as would the generation, use, and storage of hazardous materials in quantities and types that are similar to existing conditions. The Airport currently handles hazardous waste in a manner that does not pose a substantial health or safety hazard, and implementation of the proposed project would not alter this condition.

The proposed project includes the expansion of the existing CUP by 12,000 square feet at its existing location to increase its capacity for providing heated and chilled water for building heating

and cooling by replacing aging boilers with four new boilers and associated pumps and pipes, and the installation of three new upsized chillers along with an additional cooling tower cell. As with the existing CUP, operations at the expanded facility would continue to be highly regulated and comply with all relevant federal, state, and local safety regulations pertaining to the routine transport, use, and disposal of hazardous materials associated with operation of the CUP.

As described above, under the proposed project, the types and amounts of hazardous materials used, stored, handled, and transported at SDIA would be similar to that of existing conditions and would continue to occur in compliance with applicable regulations. Therefore, operation of the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials and this would be a ***less than significant impact***.

3.9.6.2.3 Mitigation Measures

Mitigation Measure MM-HW-1: Preparation of Hazardous Materials Management Plan (HMMP) and Mitigation Measure MM-HW-3: Hazardous Building Materials Abatement, presented in Section 3.9.6.1.3, also apply to the significant construction-related impact described above in Section 3.9.6.2.1.

3.9.6.2.4 Significance of Impact After Mitigation

With implementation of Mitigation Measures MM-HW-1 and MM-HW-3, construction-related impacts would be reduced to a ***less than significant impact***. Relative to operations-related impacts, the project would result in a ***less than significant impact***.

3.9.6.3 Impact 3.9-3

Summary Conclusion for Impact 3.9-3: Although the proposed project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, as further described below, this would be a *less than significant impact*** for construction and operation.**

3.9.6.3.1 Construction

Although, as identified in Section 3.9.4 above, one school, Montessori School of San Diego, is located within one-quarter mile of SDIA, the school is located on the other side of I-5 from the Airport and is approximately 0.5 mile from the nearest area of proposed construction. There is a large distance and intervening roadways and development between the school and construction activities. As such, proposed project construction would not pose a risk to the school associated with any inadvertent hazardous emissions, or handling of hazardous materials, substances, or waste. Further, as discussed under Impacts 3.9-1 and 3.9-2, although small amounts of hazardous materials would be used during construction, and contaminated materials (i.e., soil or groundwater contamination, ACMs, LBP) may be encountered, compliance with regulatory controls that govern storage, handling, transport, and disposal of such materials would ensure that no significant hazard to the public or the environment would occur. Therefore, although, if the entire SDIA boundary is considered, the proposed project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, no construction activities would occur within one-quarter mile and this would be a ***less than significant impact*** for construction.

3.9.6.3.2 Operations

The proposed project would continue the existing aviation-related land uses and would involve the generation, use, and storage of hazardous materials in quantities and types that are similar to existing conditions. The proposed project would not create additional long-term risks to the public or the environment from these substances. Therefore, although the proposed project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, this would be a ***less than significant*** impact for operations.

3.9.6.3.3 Mitigation Measures

No mitigation is required for construction or operations.

3.9.6.3.4 Significance of Impact After Mitigation

As indicated above, no mitigation is needed relative to this impact. The project would result in a ***less than significant impact*** for construction and operations.

3.9.6.4 Impact 3.9-4

Summary Conclusion for Impact 3.9-4: The proposed project would be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and could create a significant hazard to the public or the environment; however, with implementation of recommended mitigation measures, the impact would be reduced to a *less than significant impact* for construction and operation.

3.9.6.4.1 Construction

As described in Section 3.9.4, the project site is identified on numerous databases, and remediation activities associated with past occurrences of soil and groundwater contamination have taken place. Although the clean-up cases have been closed, as discussed under Impact 3.9-1, there is the potential that some soil and groundwater contamination associated with past activities could remain at concentrations above regulatory screening levels.

As described under Impact 3.9-1, contaminated soil and groundwater is expected to be encountered, and it would be remediated and/or removed during construction of the proposed project under stringent oversight by federal, state, county, and city agencies (such as the County DEH, RWQCB, and/or DTSC) in accordance with applicable regulations as identified in Section 3.9.3. Further, compliance with worker safety would be protected by adherence to requirements set forth in OSHA and CalOSHA. Notwithstanding compliance with existing federal, state, and local regulatory programs, there are certain known or potential areas of contamination at the project site associated with past activities that are identified in the Amec Phase II ESI and Kleinfelder Phase II ESA as warranting specific measures be implemented during site development in order to address such contamination. Given that those measures are not currently a part of the proposed project, the project site is included on a list of hazardous materials sites due to past activities and construction could create a significant hazard to the public or the environment. This would be a ***significant impact***.

3.9.6.4.2 Operations

As described above, any past contamination encountered at the project site would be remediated to safe levels under regulatory oversight, and therefore would not present a risk to the public or

environment during project operations. However, based on past activities occurring at the project site, there is the potential for a significant hazard to the public or the environment to occur, specifically as related to the potential for soil vapor gas intrusion into the proposed new T1 building. Therefore, the project site is included on a list of hazardous materials sites due to past activities, and operation could create a significant hazard to the public or the environment. This would be a **significant impact** for operations.

3.9.6.4.3 Mitigation Measures

Mitigation Measure MM-HW-1: Preparation of Hazardous Materials Management Plan (HMMP), presented in Section 3.9.6.1.3, also applies to the significant construction-related impact described above in Section 3.9.6.4.1. Mitigation Measure MM-HW-4: Vapor Intrusion Assessment, presented in Section 3.9.6.1.3, also applies to the significant operations-related impact described above in Section 3.9.6.4.2.

3.9.6.4.4 Significance of Impact After Mitigation

With implementation of Mitigation Measure MM-HW-1, construction-related impacts would be reduced to a **less than significant impact**. With implementation of Mitigation Measure MM-HW-4, operational impacts would be reduced to a **less than significant impact**.

3.9.6.5 Impact 3.9-5

Summary Conclusion for Impact 3.9-5: The proposed project would be 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, and it would not result in a safety hazard, but could result in excessive aircraft noise for people residing or working in the project area. As further described below, this would be a *less than significant impact* for construction and a *significant unavoidable impact* for operation relative to aircraft noise.

3.9.6.5.1 Construction

The project site is located within a public airport. The current Airport Land Use Compatibility Plan (ALUCP) was adopted in May of 2014, however, the ALUCP's land use authority does not apply to SDIA as all uses and improvements are regulated by FAA.

Numerous safeguards are required by law to minimize the potential for, and the effects from, an accident if one were to occur. Construction activities would be coordinated with FAA through the use of Form FAA 7460-1 (Notice of Proposed Construction or Alteration). The notice is used by the FAA to:

1. Evaluate the effect of the proposed construction or alteration on safety in air commerce and the efficient use and preservation of the navigable airspace and of airport traffic capacity at public use airports;
2. Determine whether the effect of proposed construction or alteration is a hazard to air navigation;
3. Determine appropriate marking and lighting recommendations, using FAA Advisory Circular 70/7460-1, Obstruction Marking and Lighting;

4. Determine other appropriate measures to be applied for continued safety of air navigation; and
5. Notify the aviation community of the construction or alteration of objects that affect the navigable airspace, including the revision of charts, when necessary.³⁸

All construction activities would comply with applicable aviation-related safeguards, and thus would not create a safety hazard. As discussed under Impact 3.12-9 in Section 3.12, Noise, none of the construction equipment noise, on an individual piece of equipment basis or with the very conservative assumption of all equipment operating at once, would result in a significant noise impact, and thus no excessive noise would occur during construction.

Therefore, although the proposed project would be located at a public airport, construction of the proposed project would not result in a safety hazard or excessive noise for people residing or working in the project area. This would be a ***less than significant impact*** for construction.

3.9.6.5.2 Operations

FAA's Airport Design Standards³⁹ establish, among other things, land use related guidelines to protect people and property on the ground, including establishment of safety zones that keep areas near runways free of objects that could interfere with aviation activities. In addition to the many safeguards required by law, SDIA and tenants of SDIA maintain emergency response and evacuation plans that also serve to minimize the potential for and the effects of an accident.

As noted above and discussed further in Section 3.11, Land Use and Planning, the current ALUCP was adopted in May of 2014. The ALUCP promotes compatibility between the Airport and future land use of the surrounding area for the orderly development of the Airport and environs and to protect public health, safety, and welfare in the surrounding area. The ALUCP provides airport land use compatibility policies and standards related to noise, safety, airspace protection, and overflight, to guide future development and redevelopment in the area surrounding the Airport, but not at the Airport itself. The Airport Land Use Commission (ALUC) is required by State law to review proposed airport plans for consistency with the ALUCP. The ALUCP must be amended as necessary to reflect any updates and revisions to the airport plans. This requirement ensures that the ALUC is kept informed of changes in airport plans, so that appropriate amendments to this ALUCP can be made. While implementation of the proposed project would require that the current ALUCP be amended to account for projected changes in the aircraft noise compatibility (65 CNEL) contour for SDIA, as discussed in Section 3.11, the proposed project does not pose a safety hazard that would require amending the SDIA ALUCP relative to safety.

Additionally, any new development outside SDIA boundaries and within the Airport Influence Area (AIA) would continue to be subject to the City's land use authority and consistency with the ALUCP. Until the City adopts regulations implementing the ALUCP, and the ALUC determines that the City's

³⁸ Code of Federal Regulations. Title 14 Chapter I Subchapter E Part 77.5(c).

³⁹ Federal Aviation Administration, FAA Advisory Circular (AC) 150/5300-13A, Airport Design, including errata, May 25, 2017. Available: http://www.faa.gov/airports/resources/advisory_circulars/index.cfm/go/document.current/documentNumber/150_5300-13/.

land use regulations are consistent (or overrules the ALUCP with two-thirds vote by the City Council), the City is required to submit development applications to the ALUC. Further, all proposed project buildings would be designed in accordance with FAA's Airport Design Standards to ensure that the buildings do not interfere with air traffic control activities or affect airfield safety. Therefore, no new safety hazard for people residing or working in the vicinity of SDIA area would be created.

As discussed in Section 3.12, Noise, future aircraft noise levels would generate aircraft noise that would increase noise levels in noise-sensitive areas to a level considered significant. Therefore, operation of the proposed project would result in an excessive aircraft noise hazard for people residing or working in the project area. Although, for informational purposes, the future aircraft noise levels would occur even if the proposed project was not implemented (i.e., future aircraft noise levels are the same for both the proposed project and the No Project Alternative).

The proposed project would be located within a public airport, and it would not result in a safety hazard for people residing or working in the project area; however, an increase in aircraft noise would result in an excessive noise hazard. As such, this would be a ***significant impact*** for operations.

3.9.6.5.3 Mitigation Measures

As described in Section 3.12, Noise, even with implementation of proposed Mitigation Measures MM-NOI-1 through MM-NOI-5, impacts associated with aircraft noise would be ***significant and unavoidable***.

3.9.6.5.4 Significance of Impact After Mitigation

Even with implementation of proposed Mitigation Measures MM-NOI-1 through MM-NOI-5, operation of the proposed project would result in an excessive aircraft noise hazard for people residing or working in the project area and the impact would be ***significant and unavoidable***. It is important to note, for informational purposes, that the future aircraft noise levels at SDIA would be the same with or without the proposed project (i.e., there is no difference in aircraft noise impacts between the proposed project and the No Project Alternative).

3.9.6.6 Impact 3.9-6

Summary Conclusion for Impact 3.9-6: The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. As such, and as further described below, this would be a *less than significant impact* for construction and operation.

3.9.6.6.1 Construction

SDIA and tenants of SDIA maintain emergency response and evacuation plans to minimize the potential for and the effects of an accident, should one occur. These response plans would remain in place both during construction and operation of the proposed project. Further, as described under Impact 3.9-5 above, construction activities would comply with SDIA and FAA guidelines and procedures that are in place to limit the impacts of construction at the Airport, including the potential to affect emergency response. Adequate ingress and egress to the Airport, including for emergency vehicles, would be provided and maintained during construction for both construction workers and those using the existing SDIA facilities (i.e., passengers and Airport workers).

Construction activities would occur within the boundaries of SDIA, with the exception of utility connections and the connection to the new on-airport entry roadway at Laurel Street. Such off-site improvements may require temporary lane closures. The lane closures would occur in coordination with the City of San Diego, the San Diego Harbor Police Department, City of San Diego Fire-Rescue Department, and San Diego Police Department, and potential roadway level of service deficiencies at key intersections and roadway links within the project site and immediate vicinity would be minimized through implementation of a construction traffic management plan. This would ensure proper advanced coordination with emergency service providers and planning of detours and emergency access routes, if needed, to maintain emergency access.

Also, during construction, access routes in and out of SDIA would be kept clear and unobstructed at all times in accordance with FAA, State Fire Marshal, and Fire Code regulations.⁴⁰ Therefore, any temporary lane closures and other construction activities would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plans.

In addition, SDIA would submit a Notice of Proposed Construction or Alteration to FAA (Form FAA 7460-1 described under Impact 3.9-5 above) in advance of construction as required by 14 CFR Section 77.9.

North Harbor Drive adjacent to SDIA and Laurel Street are identified tsunami evacuation routes on the County of San Diego Tsunami Evacuation Map for the City of San Diego.⁴¹ As described above, adequate vehicular access would be provided and maintained during construction. This includes access from surrounding properties to the tsunami evacuation routes. Further, adequate egress from the construction site must be provided pursuant to the California Fire Code. Egress from the project site during construction would include routes that would allow construction workers to reach North Harbor Drive and Laurel Street. Therefore, the proposed project would not conflict with the City's evacuation route during construction.

Compliance with emergency access requirements would ensure the proposed project would not interfere with an existing emergency response or emergency evacuation plan. Therefore, construction-related impacts related to emergency response plans or emergency evacuation plans would be *less than significant*.

3.9.6.6.2 Operations

The proposed project would be designed to provide adequate access for emergency responders and egress for visitors and employees. Further, the new on-airport entry roadway would provide a new airport access point and help to reduce congestion on off-airport/local roads and eliminate some merge and diverge points. This would benefit evacuation and response capabilities during project operation. Compliance with emergency access requirements would ensure the proposed project would not interfere with an existing emergency response or emergency evacuation plan. As such, the proposed project would not impair implementation of or physically interfere with an

⁴⁰ FAA FAR Sections 139.315–139.319—Aircraft Rescue and Firefighting (ARFF); 24 California Code of Regulations, Part 9 – California Fire Code, Chapter 9 (Fire Protection Systems) and Chapter 10 (Means of Egress).

⁴¹ County of San Diego. Tsunami Evacuation Map. No Date. Available: http://www.readysandiego.org/content/dam/oesready/en/tsunami/Map_SD_SanDiegoCityFINALv3.pdf.

adopted emergency response plan or emergency evacuation plan and impacts would be ***less than significant***.

3.9.6.6.3 Mitigation Measures

No mitigation is required for construction or operations.

3.9.6.6.4 Significance of Impact After Mitigation

As indicated above, no mitigation is needed relative to this impact. The project would result in a ***less than significant impact*** for construction and operations.

3.9.7 Summary of Impact Determinations

Table 3.9-2 summarizes the impact determinations of the proposed project related to hazards and hazardous materials, as described above in the detailed discussion in Section 3.9.6. Identified potential impacts are based on the significance criteria presented in Section 3.9.5, the information and data sources cited throughout Section 3.9, and the professional judgment of the report preparers, as applicable.

Table 3.9-2: Summary Matrix of Potential Impacts and Mitigation Measures Associated with the Proposed Project Related to Hazards and Hazardous Materials

Environmental Impacts	Impact Determination	Mitigation Measures	Impacts after Mitigation
Impact 3.9-1: The proposed project could 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; however, with implementation of recommended mitigation measures, the impact would be reduced to a <i>less than significant impact</i> for construction and operation.	Construction: Significant Impact Operation: Significant Impact	MM-HW-1: Preparation of Hazardous Materials Management Plan (HMMP) MM-HW-2: Existing Groundwater Monitoring Wells MM-HW-3: Hazardous Building Materials Abatement MM-HW-4: Vapor Intrusion Assessment	Construction: Less than Significant Operation: Less than Significant
Impact 3.9-2: The proposed project could create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during construction; however, with implementation of recommended mitigation measures, the impact would be reduced to a <i>less than significant impact</i> for construction. This would be a <i>less than significant impact</i> for operation.	Construction: Significant Impact Operation: Less than Significant	MM-HW-1: Preparation of Hazardous Materials Management Plan (HMMP) MM-HW-3: Hazardous Building Materials Abatement	Construction: Less than Significant Operation: Less than Significant

Table 3.9-2: Summary Matrix of Potential Impacts and Mitigation Measures Associated with the Proposed Project Related to Hazards and Hazardous Materials

Environmental Impacts	Impact Determination	Mitigation Measures	Impacts after Mitigation
Impact 3.9-3: Although the proposed project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, this would be a <i>less than significant impact</i> for construction and operation.	Construction: Less than Significant Operation: Less than Significant	No mitigation is required	Construction: Less than Significant Operation: Less than Significant
Impact 3.9-4: The proposed project would be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and could create a significant hazard to the public or the environment; however, with implementation of recommended mitigation measures, the impact would be reduced to a <i>less than significant impact</i> for construction and operation.	Construction: Significant Impact Operation: Significant Impact	MM-HW-1: Preparation of Hazardous Materials Management Plan (HMMP) MM-HW-4: Vapor Intrusion Assessment	Construction: Less than Significant Operation: Less than Significant
Impact 3.9-5: The proposed project would be 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, and it would not result in a safety hazard, but could result in excessive aircraft noise for people residing or working in the project area. As such, this would be a <i>less than significant impact</i> for construction and a <i>significant unavoidable impact</i> for operation relative to aircraft noise.	Construction: Less than Significant Operation: Significant	Mitigation Measures MM-NOI-1 through MM-NOI-5 (see Section 3.12, Noise)	Construction: Less than Significant Operation: Significant and Unavoidable
Impact 3.9-6: The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. As such, this would be a <i>less than significant impact</i> for construction and operation.	Construction: Less than Significant Operation: Less than Significant	No mitigation is required	Construction: Less than Significant Operation: Less than Significant

3.9.7.1 Mitigation Measures

MM-HW-1: Preparation of Hazardous Materials Management Plan (HMMP): Prior to site excavation activities and/or construction-related dewatering at the project site, a Hazardous Materials Management Plan (HMMP) shall be prepared and include the following:

- Delineation of roles and responsibilities, including those of the Contractor and those of SDCRAA;

- Procedures for identification, initial screening, and notification, of contaminated soil and/or groundwater encountered during site excavation;
- Procedures to secure/cordon-off area known to be or suspected of being contaminated;
- Procedures for decontamination of personnel and equipment leaving the secured area known to be or suspected of being contaminated;
- Procedure for assessing the nature and extent of contamination, and the approach to managing the contaminated soil/groundwater, including excavation/pumping, handling, storage, transport, and disposition (i.e., treatment/disposal); and
- Site-specific Health and Safety Plan for the safety and protection of construction workers, airport employees, and the general public from exposure to impacted soil, dust, and groundwater during construction activities.

It is anticipated that there will be a HMMP developed for the course of ADP construction, with site-specific Health and Safety Plans developed that are tailored to the specific characteristics of individual construction contracts, but all with the same purpose of providing a management plan consistent with the ADP HMMP that will adequately address known or potential contaminated soils or groundwater. Based on information presented in the 2018 Amec Phase II ESI and 2018 Kleinfelder Phase II ESA, the site-specific Health and Safety Plans for the following areas (as identified on Figures 3.9-2 through 3.9-5 of the Recirculated Draft EIR) will need to include management measures for the specific issues of concern identified therein:

- *South Side of Building 2320:* Elevated levels of total petroleum hydrocarbons and metals were detected in samples from Soil Boring B30. The Health and Safety Plan for this area shall account for the presence of impacted soil and groundwater in the vicinity of this boring location and provide measures for segregation, containment, and disposal of impacted materials, as appropriate.
- *West Side of Building 2417, South Side of Building 2415, and North Side of Washdown Pad:* Elevated levels of volatile organic compounds were detected in groundwater samples from these areas. The Health and Safety Plans for these areas shall account for the presence of contaminated groundwater and provide measures for segregation, containment, and disposal of impacted materials, as appropriate.
- *North of Terminal 1 East Rotunda:* Elevated levels of total petroleum hydrocarbons and semi-volatile organic compounds were detected in groundwater and soil samples from this area. The Health and Safety Plan for this area shall account for the presence of impacted soil and groundwater and provide measures for segregation, containment, and disposal of impacted materials, as appropriate.

This measure is considered feasible.

MM-HW-2: Existing Groundwater Monitoring Wells: In conjunction with the demolition of Terminal 1, the following measure shall be completed:

- The suspected location of monitoring well MW-3 should be investigated to confirm the presence or absence of the well. All monitoring wells located within proposed project development areas or that could otherwise be disturbed by project construction should be properly destroyed in accordance with the requirements of, and be subject to permit approval by, the County Department of Environmental Health. Should any monitoring wells associated with an open case be disturbed, the lead agency overseeing the open case shall be notified and any requirements identified by the agency associated with well disturbance shall be adhered to. This measure is considered feasible.

MM-HW-3: Hazardous Building Materials Abatement: Prior to building demolition, the following activities shall be implemented:

- SDCRAA shall retain a State of California-licensed asbestos/lead abatement contractor to perform abatement of asbestos containing material (ACM), asbestos containing construction material (ACCM), lead-based paint (LBP), or lead-containing paint (LCP) that could potentially be disturbed.
- Prior to the initiation of abatement or demolition work, the abatement or demolition contractor must complete the Notification of Demolition or Asbestos Removal form and submit it to the County of San Diego Air Pollution Control District (SDAPCD) in compliance with Rule 1206 at least 10 business days before the start of abatement or demolition. SDAPCD will return the form, with a “notification number” added, to the abatement or demolition contractor, depending on who submitted the form.
- The asbestos/lead abatement contractor shall provide written notification to the local CalOSHA district office regarding its “Intent to Conduct Asbestos Related Work” and/or “Intent to Conduct Lead-Related Work.” These notifications should be submitted at least 24 hours in advance of performing the respective asbestos-related or lead-related work.
- Other potentially hazardous building materials, including and mercury-containing equipment, polychlorinated biphenyl (PCB)-containing equipment, lead-containing batteries, chlorofluorocarbon (CFC)-containing equipment, and Universal Wastes (e.g., fluorescent light tubes) will require segregation and may require further testing and analysis to determine whether they meet the definition of a hazardous waste in California and can be managed under the Universal Waste Rules. Hazardous wastes should only be handled by properly trained workers.
- Notification should be provided to contractor and subcontractor personnel as to the presence of ACMs, ACCMs, LBPs, LCPs, and other hazardous building materials at the site.

This measure is considered feasible.

MM-HW-4: Vapor Intrusion Assessment: In conjunction with building design of the new T1, the following measure shall be completed:

A soil vapor survey with accompanying human health risk assessment shall be prepared for the area proposed for the new T1 building. If found warranted by the results of that assessment, remediation, such as in-situ soil vapor extraction (SVE) or ex-situ excavation and treatment, shall be implemented to reduce levels to below site-specific risk-based concentrations (RBC), or a vapor intrusion mitigation system shall be incorporated into the design of the new T1 building to ensure that indoor air concentrations do not exceed regulatory thresholds. As part of that effort, the 2014 vapor intrusion investigation for the former Teledyne Ryan Facility site shall be reviewed as it pertains to future buildings within the subject area. This measure is considered feasible.

3.9.8 Significant Unavoidable Impacts

There would be significant and unavoidable impacts to hazards and hazardous materials resulting from implementation of the proposed project, specifically as related to operational aircraft noise impacts. It should be noted for informational purposes, that the same impacts would occur from future operations at SDIA even if the proposed project were not implemented (i.e., those impacts would be the same between the proposed project and the No Project Alternative).