

A. SUMMARY

According to previous investigations, asbestos and lead-based paint are present in some existing buildings on the Main Campus. If these substances were found during proposed building demolition, the College would be responsible for complying with existing rules and regulations pertaining to the removal and disposal of asbestos and lead-based paint.

There is a potential for exposure of construction workers and users of the campus to be exposed to site contamination (soil and groundwater) as the result of proposed construction. Potential subsurface contamination as a result of leaking chemicals and historical herbicide and pesticide use has been identified at the North and South Gymnasium basement boiler room, the Grounds Maintenance and PE Field Storage buildings, and the Horticulture Building. In addition, a closed-in-place 3,000-gallon diesel UST, located east of North Gym, and a potential crude oil tank in front of Science Hall, may also be sources of potential soil and groundwater contamination. The potential for exposure is considered a significant impact, which would be mitigated by compliance with standard site remediation and safety procedures.

Site records indicate that there is an area of non-engineered fill in the southeastern portion of the Main Campus beneath the Central Shops, Warehouse, and Practice Field. Analysis of the site included a 1993 geotechnical investigation. Quarterly groundwater monitoring in 1993-4 resulted in non-detectable or trace analyte concentrations and was discontinued. Gas readings, however, identified isolated pockets of methane throughout the fill at concentrations from trace to 100 percent of the lower explosive limit (LEL). Disturbance to the fill during construction activities could expose workers and the public to methane gas; the gas could reach explosive concentrations or produce an oxygen-deficient atmosphere within enclosed structures. This potential impact is considered significant, and would be mitigated by the measures identified in this section.

B. INTRODUCTION

As part of the preparation of this EIR, Treadwell & Rollo prepared a Phase I Environmental Site Assessment of the CCSF Main Campus, focusing on the areas of proposed development. The following discussion is based primarily on that assessment and personal communication with CCSF staff. The Phase I ESA is on file and available for review at the City College of San Francisco Administrative Offices, 33 Gough Street, San Francisco, during normal business hours.

This section addresses the potential impacts associated with hazardous building materials, hazardous materials use and storage, hazardous waste generation and storage, and exposure to soil and groundwater contamination that may result from implementation of the proposed project.

A number of properties may cause a substance to be considered hazardous, including toxicity, ignitability, corrosivity, or reactivity. According to the State of California, a hazardous material is defined as:

“a substance or combination of substances which, because of its quality, concentration, or physical, chemical or infectious characteristics, may either: 1) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating irreversible illness; or 2) pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported, or disposed of or otherwise managed.”¹

C. EXISTING CONDITIONS

C1. Hazardous Building Materials

Existing structures on the CCSF Main Campus may contain hazardous materials, such as asbestos, lead, mercury, or other substances. In the past, asbestos, polychlorinated biphenyls (PCBs), and lead were commonly installed in insulation, floor tiles, roofing tar, electrical transformers, fluorescent light ballasts, and paint. Mercury is a common component in electrical switches and fluorescent light bulbs. According to CCSF staff, for the most part, asbestos and lead in the structures on the Main Campus have been removed and replaced.² Asbestos and lead paint surveys were conducted between the years 1987 and 2000 at the North and South Gymnasiums, Bungalows 206, 207, 213, and 401-404, and the Gardener’s Shed, and indicated the presence of asbestos and lead paint. Comprehensive testing of all existing structures for the presence of hazardous materials such as asbestos and lead has not been conducted.³

C2. Hazardous Materials Use and Storage

Hazardous materials are used and stored at various locations throughout the CCSF Main Campus. The materials are primarily associated with academic department use or campus facilities and landscape maintenance. The materials are organized into broad classes that include hazardous solids, corrosives, flammables, oxidizers, toxics, spontaneous combustibles, and explosives.⁴ The handling of hazardous materials on campus is overseen by a private firm under contract to CCSF. The contractor also prepared the Hazardous Materials Business Plan (HMBP), Chemical Hygiene Plan (CHP) and Hazard

¹ Title 22, California Code of Regulations [CCR], Section 66084.

² Keenan, Jim, Superintendent of Buildings, Grounds & Maintenance, personal communication, October 27, 2003.

³ Treadwell & Rollo, Phase I Environmental Site Assessment, October 9, 2003.

⁴ Based on data provided by Mejia, Nestor, MSES, Inc. on October 31, 2003 and personal communication with Duque, Carlos, Environmental Specialist, MSES, Inc. on November 5, 2003.

Communication Plan (HazCom), which are implemented by the CCSF Buildings and Grounds Department.⁵

Academic departments at CCSF that use hazardous materials include Science Education, Arts Education, and Industrial Programs Education.⁶ These academic departments use hazardous materials for instruction. The materials used include chemicals commonly used in classroom laboratories such as acids, bases, volatile organic compounds (VOCs), alcohol, photo-chemicals, fixers and adhesives.⁷ The materials are generally stored in cabinets under lock and key, laboratories, or in storage areas adjacent to buildings. Hazardous materials are disposed into waste drums that are periodically picked up by a private firm under contract to CCSF (discussed below).⁸

Hazardous materials are used for campus maintenance, including the general upkeep of facilities such as buildings and greenhouses, and for landscaping. The hazardous materials used include fuels, herbicides and pesticides. Herbicides observed during a site reconnaissance included Roundup, Poast and Activator.⁹ The hazardous materials used for campus maintenance are stored in the Gardener's Storage building adjacent to the practice field. A site reconnaissance of the Gardener's Storage building revealed herbicides, gasoline, paints, lubricants, cleansers and other miscellaneous shop supplies. Fuels were stored in 1.0- and 2.5-gallon plastic and metal storage containers. The Grounds Maintenance Building also stores fuel (gasoline and diesel) in 1.0- and 2.5-gallon containers, lubricants, degreasers, cleansers, and other shop supplies.¹⁰ The Horticulture Department currently stores its herbicides in sealed containers, in a refrigerator outside the Horticulture building.¹¹

According to the Phase I ESA, there is one active underground storage tank (UST) on the campus. In 1999, the College installed this 8,000-gallon, double-walled fiberglass UST, and an overfill protection and monitoring system, near the north end of Cloud Hall.

C3. Hazardous Waste Generation and Disposal

The CCSF Main Campus generated 5,592 pounds (lbs) of hazardous waste in 2002 (76 'lab-packs'). This amount is approximately 58 percent of the total hazardous waste produced by all CCSF campuses in

⁵ Jackson, Steve, RGA Environmental, personal communication, November 11, 2003.

⁶ Jackson, Steve, RGA Environmental, personal communication, October 31, 2003.

⁷ Treadwell & Rollo, Phase I Environmental Site Assessment, October 9, 2003.

⁸ Jackson, Steve, RGA Environmental, personal communication, October 31, 2003.

⁹ Treadwell & Rollo, Phase I Environmental Site Assessment, October 9, 2003.

¹⁰ Treadwell & Rollo, Phase I Environmental Site Assessment, October 9, 2003.

¹¹ Brown, Steve, Horticulture Department Chair, personal communication, November 4, 2003.

2002.¹² According to the San Francisco Department of Public Health (DPH) CCSF is registered as a RCRA Large Quantity Generator.¹³ In general, hazardous waste is accumulated by the originator and disposed into on-campus containers (5-, 20-, 30- and 55-gallon 'lab-packs'). The CCSF campuses have a contract with a private firm that oversees the campus hazardous waste programs. A subcontractor to the management firm transports and disposes of the hazardous wastes on all CCSF campuses, including the Main Campus. The lab-packs are picked up quarterly and are transported to a hazardous waste incinerator at Teris, El Dorado, Arkansas. The generation of waste is reported to the CCSF Director of Buildings and Grounds.

In between pick-ups, hazardous wastes are generally stored near the department that uses them. Waste from the Biology and Chemistry Departments is stored in the Chemistry Building basement. Art Department wastes are kept in a storage area in the Visual Arts Building. Hazardous wastes including oil, used batteries, and dirty rags are stored in the North and South Gym basement boiler room. Duplicating fluid from the campus copy center is stored on site, and the Health Clinic stores its own wastes for pickup as well.¹⁴ An inventory of the hazardous materials on campus and their locations is kept as part of the hazardous materials programs implemented by Buildings and Grounds.¹⁵

Local enforcement of hazardous materials usage and storage is administered by the SFDPH Hazardous Materials Unified Program Agency. Periodic inspections are made by SFDPH and the San Francisco Fire Department (SFFD), including a review of hazardous waste manifests.¹⁶ In the event of an emergency or a spill/upset, the campus contractor will respond to calls from the campus within 24 hours.¹⁷ CCSF files a Certificate of Registration with SFDPH that covers all hazardous materials on campus. The CCSF Main Campus Facility ID# is 9772 and registration is renewed annually.¹⁸ CCSF does not have any hazardous waste permits.¹⁹

12 Total hazardous wastes as reported by Mejia, Nestor, MSES, Inc. for the CCSF campuses combined was 9,612 lbs. Personal communication, October 31, 2003.

13 Resource Conservation and Recovery Act (RCRA).

14 Duque, Carlos, Environmental Specialist, MSES, Inc., personal communication, November 5, 2003.

15 Hazardous Materials Business Plan (HMBP), Chemical Hygiene Plan (CHP) and Hazard Communication Plan (HazCom) programs.

16 Treadwell & Rollo, Phase I Environmental Site Assessment, October 9, 2003.

17 Duque, Carlos, Environmental Specialist, MSES, Inc., personal communication, November 5, 2003.

18 Fosdahl, Patrick, Senior Environmental Health Inspector, San Francisco Department of Public Health, personal communication, November 14, 2003. S

19 Jackson, Steve, RGA Environmental, Inc. personal communication, November 13, 2003.

C4. Soil and Groundwater Contamination

There are no known areas of soil or groundwater contamination at the Main Campus. According to the Phase I ESA, there are several suspected locations of contamination that include the following:

- A former 3,000-gallon UST was present east of the North Gymnasium. The UST was closed-in-place in 1993. The UST was rinsed and filled with concrete slurry and soil samples around the site were collected. Samples were taken from locations near the UST at depths of 20-, 30- and 35-feet below ground surface (bgs), and from beneath the fill line at five feet bgs. These soil samples were analyzed for total petroleum hydrocarbons quantified as gasoline (TPHg), total petroleum hydrocarbons quantified as diesel fuel (TPHd), and total oil and grease (TOG). A sample collected near the UST at 30 feet bgs contained TOG at 52 milligrams per kilogram (mg/kg). All of the other samples contained non-detectable concentrations of TPHg, TPHd and TOG.
- In the North Gymnasium boiler room, oil was observed to have dripped down the side of the tank and onto the concrete floor where staining was observed. Water is discharged to a floor drain. Based on the long-term use of the boiler room (since 1940), the potential exists for subsurface contamination.
- In the South Gymnasium boiler room there is moderate staining on the concrete floor. In the boiler room there is a floor drain. Based on the long-term use of this boiler room (since 1940), the potential exists for subsurface contamination.
- The Grounds Maintenance and PE Field Storage building was constructed around 1999. It has been used for storage of pesticides, herbicides, gasoline, and diesel fuel. It is also near the area where greenhouses were present in the 1960s. The building is currently used for grounds maintenance equipment storage, a shop area, and a sports equipment area. Discarded paint and other containers were observed around the exterior of the building. Based on the disposal practices at the building and the historical presence of the greenhouses, the potential exists for subsurface contamination in this area.
- Herbicides and pesticides have been used in the greenhouse and Environmental Horticulture Building for over 50 years. Because of the hydrogeologically upgradient location of the area, hazardous materials use could affect groundwater in other areas of the campus. Also, pesticide use may have affected shallow soils in the area.
- A crude oil tank was installed in front of Science Hall near Phelan Avenue in 1941. There is no information available concerning the nature, exact location, or disposition of the tank. If the tank was or is leaking, there is a potential that groundwater may have been affected.

C5. Landfill Gas

In the 1950s, a fill area was created by a cut and fill process in the southeastern portion of the campus beneath the existing Central Shops, Warehouse, and Practice Field. Landscaping wastes, organic debris, and debris from a horticulture building destroyed in a fire were used as fill material. The maximum fill thickness was found to be approximately 15 feet and debris was found at depths of 3 feet bgs. No waste material in the fill area originated off campus. A geotechnical investigation of the fill area included soil and groundwater analysis. Fifty-three soil samples were collected from 12 soil borings and groundwater samples were collected from 3 groundwater-monitoring wells. The samples were analyzed for chlorinated pesticides, lead, TPHg and BTEX. Methane gas readings were also taken. Groundwater was reported at 35 to 44 feet bgs, flowing in a southerly direction. The results of the analysis indicated that trace amounts of pesticides were found in the soil. Elevated concentrations of lead were detected in five samples and exceeded Soluble Threshold Limit Concentrations (STLC) values in two samples. Lead was not detected in groundwater. TPHg was detected in two soil samples at maximum concentrations of 160 mg/kg, but not detected in groundwater. Methane was found in isolated pockets throughout the fill, ranging from trace levels to 100 percent of the lower explosive limit (LEL).²⁰

At the request of the SFDPH, in 2001, quarterly monitoring of methane gas using probes in the Central Shop was conducted to evaluate the potential migration of methane gas. Concentrations of methane were found to exhibit a decreasing trend and did not extend to the field equipment storage building. In 2002, with SPDPH approval, the monitoring was discontinued.²¹

D. REGULATORY FRAMEWORK

D1. Hazardous Materials Regulatory Framework

The Federal Emergency Planning and Community Right-to-Know Act of 1986 imposes restrictions on hazardous materials. The California Environmental Protection Agency (CalEPA) Department of Toxic Substances Control (DTSC) regulates the generation, transportation, treatment, storage and disposal of hazardous waste under RCRA and the State Hazardous Waste Control Law (HWCL). Storage of hazardous materials in USTs is regulated by the State Water Resources Control Board (SWRCB), which has overall responsibility for implementing all regulations set forth in Title 23 of the California Code of Regulations. State standards cover the installation and monitoring of new tanks, monitoring of existing tanks, and corrective actions for removed tanks. Implementation of state UST regulation, including permitting, is enforced locally by the SFDPH. The SFDPH's Chemical Hazards Program includes the Hazardous Materials Program which issues Hazardous Materials Unified Program Agency (HMUPA)

²⁰ STL concentrations are used to determine whether waste is classified as hazardous for purposes of disposal.

²¹ Treadwell & Rollo, Phase I Environmental Site Assessment, October 9, 2003.

Compliance Certificates and/or Permits, inspects regulated facilities, reviews and approves risk management plans, oversees UST installations, modifications, closures and removals, and responds to complaints at regulated facilities. Other related programs at SFDPH include the Hazardous Waste Program and the Local Oversight Program, which provide regulatory oversight of hazardous materials for the City and County of San Francisco.²²

D2. Maher Ordinance, San Francisco Public Works Code, Chapter 10, Article 20

Chapter 10, Article 20 of the San Francisco Public Works Code is known as the “Maher Ordinance.” The Maher Ordinance is legislation that requires an investigation of hazardous wastes in soil at construction sites as a prerequisite for certain building requirements. Ordinance #253-86 imposes three major requirements on proposed developments:

- A site history report to describe past site uses;
- A soil analysis report that evaluates results of chemical tests; and
- A site mitigation report if the soil is contaminated.

The reports are submitted to the Department of Public Works (SFDPW) and SFDPH. Article 20 regulations take effect at the time of the building permit application for projects located on filled land requiring excavation. The Article 20 investigation is required if:

- (1) More than 50 cubic yards of soil are to be disturbed, and
- (2) The project site is bayward of the historic high tide line (i.e. in an area of Bay fill), as designed on an official City map, or
- (3) The site is at any other location in the City designated for investigation by the Director of the SFDPW.

Parcels qualifying under the third condition are places where the Director has reason to believe hazardous wastes are present, such as sites listed by a public agency, or sites known to have leaking underground storage tanks. The Maher Ordinance protects the safety of the City’s workers, residents, and occupants from hazardous waste contamination.

²² The Hazardous Waste Program oversees the Maher Ordinance (analyzing soil for hazardous wastes); the Site Mitigation Program provides oversight of the improvement of contaminated sites in the City and County of San Francisco; and the Local Oversight Program provides regulatory oversight at UST release sites in accordance with State Laws, regulations and Water Board policies.

D3. City of San Francisco Hazardous Materials Ordinance: Article 21

The Hazardous Materials Ordinance, Article 21 of the San Francisco Municipal Code provides for the safe handling of hazardous materials in the City. Any person or business that handles, sells, stores, or otherwise uses hazardous materials in quantities exceeding specified thresholds (e.g. 55 gallons or 500 lbs) is required to register the hazardous materials with the SFDPH. Registration is documented by obtaining a Certificate of Registration from the City.

The Hazardous Materials Ordinance helps protect the health and safety of the general community and of emergency response personnel, such as fire fighters and paramedics. Data on hazardous material uses are stored in a Citywide computer system and can be made available to emergency responders in the event of an emergency. Inspections are performed by the City every one to two years or upon complaint.

D4. San Francisco General Plan

The handling of hazardous materials is addressed in the Environmental Protection Element²³ of the *San Francisco General Plan*. In general, hazardous material responsibilities are shared among federal, state and local levels of government. The State has delegated much of its enforcement and inspection function to the local Departments of Public Health, whose involvement is described above. The following are the relevant hazardous materials policies in the *General Plan*.²⁴ (Project consistency with relevant General Plan policies is discussed in **Section 4.1, Land Use and Planning**.)

Source Reduction

Policy 19.1: Identify reduction opportunities through waste reduction audits.

Policy 19.3: Encourage City agencies to act as role models by establishing a Waste Minimization Program.

Adequate Facilities

Policy 20.1: Ensure that siting and permitting authorization for proposed off-site facilities or facilities expansion adequately protects the public health and provides for effective hazardous waste management and economic efficiency.

Policy 20.3: Preserve the existing treatment and storage facilities at the site they currently occupy, if feasible.

²³ The Environmental Protection Element was amended by resolution 13941 on 8/17/1995.

²⁴ For discussion of the policies please refer to the Environmental Protection Element.

Protection of Health and Environment

Policy 21.1: Prevent illegal disposal.

Policy 21.2: Strengthen enforcement efforts.

Emergency Source Response Capability

Policy 22.1: Ensure proper emergency response preparation.

Policy 22.2: Coordinate and strengthen interagency response efforts.

E. SIGNIFICANCE THRESHOLDS

For purposes of this EIR, thresholds were used from both the City and County of San Francisco Initial Study Checklist and Appendix G of the CEQA Guidelines (Environmental Checklist Form).

The City and County of San Francisco typically uses the following criteria (from the City's Initial Study Checklist) when determining whether a project could have a significant effect on the environment:

Could the project:

- a. Create a potential health hazard or involve the use, production, or disposal of materials which pose a hazard to people or animal or plant populations in the area affected?
- b. Interfere with emergency response plans or emergency evacuation plans?
- c. Create a potentially substantial fire hazard?

In addition, Appendix G of the CEQA Guidelines (Environmental Checklist Form) lists the following items to be considered when determining whether a project could have a significant effect on the environment:

Would the project:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- 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;
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 ("Cortese List") and, as a result, would it create a significant hazard to the public or the environment;

- For a project located within an area covered by an airport land use plan, or where such plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard for people residing or working in the project area;
- For a project located within the vicinity of a private airstrip, result in a safety hazard for people residing or working in the project area;
- Impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan; or
- Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

If implementation of the project exceeds any of the standards outlined above, the project would result in a significant impact.

The following analysis addresses impacts related to hazardous materials use, transport and disposal and potential hazards from site contamination. The CCSF Main Campus is not within an airport land use area or near a private airstrip, so safety hazards related to aviation are not addressed further. The Main Campus is in a completely urbanized area and is not on or adjacent to wildlands; therefore, hazards related to wildland fires are not addressed further. As part of Master Plan implementation, CCSF would update its adopted emergency response and evacuation plans to reflect the proposed uses.²⁵ Therefore, impacts related to interference with emergency response plans are not addressed further.

F. IMPACTS AND MITIGATION MEASURES

Hazards-1 Hazardous Material Use, Transport, and Disposal

Impact

Master Plan Buildout

Implementation of the proposed Main Campus Master Plan would result in the use, transport and disposal of hazardous materials typical to those of a college campus. The hazardous materials used would be similar in nature to those used during activities that already exist on campus. As described in the Setting, hazardous materials used on campus are typically associated with academic department use or campus facilities and landscape maintenance. Established programs and procedures implemented by the Buildings and Grounds Department ensure that hazardous materials are used, stored, transported and disposed of properly.

The uses contemplated under the Master Plan include classrooms, offices, support facilities, public assembly space, medical uses, child care, athletic facilities, and parking. Most of these uses would replace

²⁵ Jackson, Steve, RGA Environmental Inc., personal communication, November 13, 2003.

similar uses that are already present on campus. Hazardous material use generated by the majority of the individual projects in the Master Plan would be similar to the existing types and levels of use, and would be considered minor in nature. (Hazardous materials use and waste generation for the Community Health & Wellness Center and Student Health Center & Classroom Building (Health Center) are discussed more specifically under “Near Term Development,” below.) Therefore, the Master Plan would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

With the project, minor accidental releases of project-related hazardous materials would be possible, as they are now. The campus would continue to follow its established emergency response procedures. There are two schools directly adjacent to the campus, Lick-Wilmerding High School and Riordan High School. Given the nature, volume, and use of the materials described in this section, the project would not raise significant issues with respect to upset conditions or the handling of acutely hazardous materials near schools.

Near-Term Development

The proposed Community Health & Wellness Center and Health Center would use hazardous materials on a daily basis. The proposed Community Health & Wellness Center would be located north of Ocean Avenue and east of the existing Student Services complex. The Community Health & Wellness Center would contain a multi-purpose gymnasium, indoor pool, training rooms, locker rooms, classrooms and studios, faculty offices and support facilities. Swimming pool chemicals would be used, stored, transported, and disposed of similarly to other campus hazardous materials and wastes, and in accordance with existing safety regulations.

The proposed Health Center would be in the northwest corner of the campus, and would replace the existing Campus Health Center. The new Health Center would include medical, psychiatric, and academic services. Hazardous materials used and wastes generated by the existing Campus Health Center include chemicals, medical wastes, and ‘sharps’ (e.g. razors, syringes, etc.).²⁶ Hazardous materials use and wastes generated at the proposed Health Center would be similar in nature. For example, small amounts of hazardous materials (solvents) would be used in cleaning and sterilizing processes. Compressed gases (such as oxygen) could be used for patient respiratory care. These materials would be used, stored, transported, and disposed of similarly to other campus hazardous materials and wastes, and in accordance with existing safety regulations (including the specific requirements that apply to medical wastes). In addition, staff at the new Health Center would employ the same protective measures as are currently used (such as use of protective clothing and proper washing) to prevent exposure to hazardous materials.

²⁶ Duque, Carlos, Environmental Specialist, MSES, Inc., personal communication, November 5, 2003.

For the reasons noted above and in the discussion of the impacts of the Master Plan buildout, the near-term projects would result in less- than- significant impacts related to hazardous materials use, transport, and disposal.

Reservoir Configuration

If the MOU between CCSF and SFPUC were not approved and the Balboa Reservoir were not reconfigured, Master Plan development would occur within the southern reservoir only. Potential impacts related to hazardous materials use, transport, and disposal would be the same as described for development on the reconfigured reservoir. Therefore, construction within the southern reservoir only would result in less- than- significant impacts related to hazardous materials, use, transport, and disposal.

Mitigation

No mitigation is required.

Significance After Mitigation

Less than significant.

Hazards-2 Potential Exposure to Contamination

Impact

Master Plan Buildout

Implementation of the proposed Main Campus Master Plan could result in the exposure of construction workers, students, faculty, staff, and visitors to sources of contamination. Potential sources of contamination as a result of the Master Plan include exposure to hazardous building materials and to soil and groundwater contamination. Hazardous building materials include asbestos, lead-based paint and other substances such as PCBs and mercury. Suspected sources of site contamination are discussed in the Setting. The potential for exposure to contamination resulting from the Master Plan is discussed below.

Hazardous Building Materials

Asbestos. The proposed project would involve the demolition and renovation of existing structures on the site that may contain friable asbestos. Inadvertent releases of friable asbestos could expose construction workers, students and faculty, or visitors to this hazardous material, and could result in various adverse health effects if exposure were of sufficient quantity. CCSF would be required to comply with regulations and guidelines pertaining to abatement of and protection from exposure to asbestos. Section 19827.5 of the California Health and Safety Code, adopted January 1, 1991, requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants,

including asbestos. (Although CCSF would not be subject to local demolition or alteration permits, the federal regulations would still apply.) The Bay Area Air Quality Management District (BAAQMD) is vested by the California legislature with authority to regulate airborne pollutants, including asbestos, through both inspection and law enforcement. The demolition, renovation or removal of asbestos-containing building materials is subject to the limitations of District Regulation 11, Rule 2: Hazardous Materials, Asbestos Demolition, Renovation, and Manufacturing. Compliance with Regulation 11, Rule 2 would ensure that any potential impacts due to asbestos would be reduced to a less-than-significant level.

Lead-based Paint. The proposed project includes demolition and renovation of structures that may contain lead-based paint. Inadvertent releases of lead-based paint could expose construction workers, students and faculty, or visitors to this hazardous material, and could result in various adverse health effects if exposure were of sufficient quantity. CCSF would be required to comply with regulations and guidelines pertaining to abatement of and protection from exposure to lead-based paint. Demolition must comply with Title 17, California Code of Regulations, Division 1, Chapter 8: Accreditation, Certification and Work Practices for Lead-Based Paint and Lead Hazards and Title 8, California Code of Regulations, Section 1532.1 Cal/OSHA Construction Safety Orders, Lead. Title 17 includes work practice standards related to the evaluation and abatement of lead in public and residential buildings.²⁷ Title 8 covers construction work where an employee may be exposed to lead, including metallic lead, inorganic lead compounds, and organic lead.²⁸ Compliance with the regulations and procedures outlined in Title 17 and Title 8 would ensure that the potential impacts of demolition due to lead-based paint would be reduced to a less-than-significant level.

Other Hazardous Building Materials. The proposed project includes demolition and renovation of structures that may contain PCBs and mercury. Inadvertent release of such materials could expose construction workers, students and faculty, or visitors to these substances, which could result in various adverse health effects if exposure were of sufficient quantity. Although abatement programs similar to those described for asbestos and lead-based paint have not been adopted for PCB and mercury testing and cleanup, items containing PCBs and mercury that are intended for disposal must be managed as hazardous waste and must be handled in accordance with OSHA worker protection requirements. Compliance with these requirements would ensure that any potential impacts due to PCBs and mercury would be reduced to a less-than-significant level.

Soil and Groundwater Contamination

There are no known areas of soil or groundwater contamination on the project site(s). However, a potential for soil and groundwater contamination does exist and suspected areas of contamination were

²⁷ See Article 16 of Title 17, California Code of Regulations, Division 1, Chapter 8. Work Practice Standards Section 36000 and 36100.

²⁸ See Title 8, California Code of Regulations, Section 1532.1 amended June 19, 2003.

identified in the Phase I ESA. Disturbance of contaminated areas could expose construction workers, students, faculty, staff, and visitors to these substances, and could result in adverse health effects if exposure were of sufficient quantities. Suspected areas of soil and/or groundwater contamination include the area east of the North Gymnasium, the North and South Gymnasium Boiler rooms, the Grounds Maintenance and PE Field Storage Building, the Environmental Horticulture Building and Greenhouses, and the area in front of Science Hall and near Phelan Avenue. The potential to encounter contaminated soil and/or groundwater during site grading and construction, exposing workers and the public to contaminants is considered a significant impact.

Near-Term Development

The impacts of development of the proposed near-term projects (Health Center, Child Development Center, practice field, and reservoir berm removal/wall construction) are addressed in the discussion of the impacts of the Master Plan buildout, above. According to the Phase I ESA, the proposed Community Health & Wellness Center would be located above and adjacent to a fill area containing organic waste; development in this location could result in the exposure of construction workers and the public to methane gas.

The geotechnical investigation performed for the Community Health & Wellness Center found that loose to medium-dense fill material covers a substantial portion of the proposed Community Health & Wellness Center site. Given the presence of potentially liquefiable soils, possible options include 1) over-excavation of the fill material and replacement with engineered fill, 2) in-situ soil improvement, or 3) design of deep foundations (piers or piles). If the soil in the fill area is either removed or treated in situ, potential impacts from methane gas exposure would be reduced to a less-than-significant level. With the third option, a potential for exposure to methane gas would still exist. The potential exposure of construction workers and the public to methane is considered a significant impact.

Reservoir Configuration

If the MOU between CCSF and SFPUC were not approved and the Balboa Reservoir were not reconfigured, Master Plan development would occur within the southern reservoir only. Potential impacts related to potential contamination would be the same as described for development on the reconfigured reservoir.

Mitigation

Hazards-2a: If evidence of contamination (e.g., odors, stained soil, or a sheen on surface water or groundwater) is encountered during excavation, the San Francisco Department of Public Health and the State Department of Health Services shall be notified and excavation shall be halted until soil and/or groundwater samples can be collected and analyzed for contaminants if required. The project sponsor shall conduct a soil and/or groundwater

sampling survey(s) of the area of suspected contamination, as required by these agencies, to ensure that all areas of suspected surface and subsurface contamination subject to ground disturbance during site development activities are sampled. Sampling shall extend at least to depths proposed for excavation. The samples shall be analyzed to identify and quantify any contamination.

- Hazards-2b:** If the sampling conducted pursuant to Mitigation Measure **Hazards-2a** identifies surface and/or subsurface contamination in areas subject to ground disturbance, the area shall be remediated in accordance with the standards, regulations, and determinations of local, state, and federal regulatory agencies. The project sponsor shall coordinate with the Department of Public Health and any other applicable regulatory agencies to adopt contaminant-specific remediation target levels. The hazardous substances shall be removed and disposed of at an approved site, or other appropriate actions such as in-situ remediation shall be taken.
- Hazards-2c:** All reports and plans prepared in accordance with Mitigation Measures **Hazards-2a** and **-b** shall be provided to the San Francisco Department of Public Health, the State Department of Health Services, and any other appropriate agencies identified by these agencies. When all hazardous materials have been removed from existing buildings, and soil and groundwater analysis and other activities have been completed, as appropriate, the project sponsor shall submit to the San Francisco Department of Public Health and the State Department of Health Services (and any other agencies identified by these agencies) a report stating that the applicable mitigation measure(s) has (have) been implemented. The report shall describe the steps taken to comply with the mitigation measure(s) and include all verifying documentation. The report shall be certified by an REA or similarly qualified individual who states that all necessary mitigation measures have been implemented, and specifying those mitigation measures that have been implemented.
- Hazards-2d:** Prior to the development of the Community Health & Wellness Center, CCSF shall conduct a soil-gas survey that evaluates the presence of methane gas to determine whether methane gas has collected beneath paved areas over the identified fill area. CCSF shall further delineate fill materials if required by the San Francisco Department of Public Health based on the results of this survey.
- Hazards-2e:** If fill material is removed as part of the development of the Community Health & Wellness Center, the recommendations and required procedures of the San Francisco Department of Public Health regarding worker safety shall be implemented during the removal process. The fill material shall be sampled and analyzed for pesticides, lead, and other contaminants as required by the San Francisco Department of Public Health. If

contamination is detected above regulatory limits, the fill may require disposal as hazardous waste.

Hazards-2f: If construction of the Community Health & Wellness Center does not include removal of all fill material, the following steps shall be taken: if needed based on the results of the soil gas survey, the building foundation design shall include an impervious gas barrier, ventilation systems, or other devices sufficient to prevent buildup of landfill gases above regulatory limits in the building. The project sponsor shall perform landfill gas monitoring as required by the San Francisco Department of Public Health. This effort may include installation of additional methane gas monitoring wells in or near the Community Health & Wellness Center and methane gas-detection equipment in all below-grade structures in the vicinity of the fill area.

Significance After Mitigation

Implementation of Mitigation Measures –2a through –2f would reduce impacts associated with soil and groundwater contamination to a less-than-significant level.

Hazards-3 Impacts of Citywide Master Plan Development

Impact

As stated in the Project Description, changes at most of the other CCSF campuses would be minor, such as the remodeling of existing space. The hazards and hazardous materials impacts associated with the Mission and Chinatown/North Beach campuses have already been analyzed in certified EIRs (see **Section 3.0, Project Description**, for full citations of these documents). That analysis has been incorporated into this EIR by reference.

The 1998 EIR for the Chinatown/North Beach Campus found that soil or groundwater at Lot 12 might be contaminated and was not able to confirm if the Fong Building contained hazardous materials. In light of these findings, the EIR called for the San Francisco Community College District to conduct investigations and implement measures in accordance with health, safety, and environmental laws, regulations, and standards. With these efforts, the impacts from hazards and hazardous materials would be less –than significant. The 1999 Addendum did not change these conclusions. Impacts from hazards and hazardous materials were scoped out by the Initial Study for the Mission Campus project. With mitigation for asbestos, the project would not create significant effects related to possible hazardous materials contamination. Moreover, since the volume of hazardous materials already stored on the site would not change and since an Emergency Response Plan was already in place, the impact from hazards and hazardous materials would be less –than significant. Given that compliance with applicable regulation would address the potential effects, and that the Chinatown/North Beach and Mission campuses are

separated from the Main Campus, there would be no significant cumulative impacts from Citywide Master Plan development.

Mitigation

No mitigation is required.

Significance After Mitigation

Less than significant.

Hazards-4 Cumulative Impacts

Impact

As stated in **Section 4.1, Land Use and Planning**, there are no major projects within the vicinity of the Main Campus. An apartment complex is under construction several blocks west of the campus and a new library branch is scheduled for construction in 2005 on Ocean Avenue south of the west end of the Balboa Reservoir. These projects are relatively small. Both developments would generate minor use of hazardous materials and household hazardous wastes, and thus would not combine with the project to result in significant cumulative impacts.

The Draft *Balboa Park Station Area Plan* includes a recommended development program for the Phelan Loop Area. The program would include the extension of Harold, Lee, and Brighton Avenues across Ocean Avenue; relocation of the MUNI layover facility; several public open spaces; mixed-use development of up to five stories (45 to 55 feet); possible redevelopment of the fire station/bookstore parcel near the corner of Phelan and Ocean Avenues; and possible development of a branch library. The *Station Area Plan* is still in draft form and the anticipated date of approval is unknown; no specific projects within the Phelan Loop have been formally initiated. Therefore, future use of the area is considered too speculative to analyze in detail (and thus is not included in the cumulative impacts analysis). From a general standpoint and for informational purposes, the mixed-used development could involve a relatively minor amount of hazardous materials use and hazardous waste generation. Depending on the site conditions, redevelopment of the area could expose people to site contamination; the exposure could extend to users of the Main Campus. However, developers of the area would be required to follow standard remediation procedures to the extent necessary to reduce exposure to safe levels.

The draft *Balboa Park Station Area Plan* proposes that public open space be developed on top of the western part of the Balboa Reservoir if the SFPUC uses it for water storage. Should the SFPUC determine that the reservoir is not needed or not feasible, the Plan proposes that housing and open space be developed. For reasons noted elsewhere in this EIR, any future use of the western part of the reservoir is speculative (and thus is not included in the cumulative impacts analysis). From a general standpoint and

for informational purposes, development of the reservoir area would result in impacts similar to those described for the Phelan Loop site.

Mitigation

No mitigation is required.

Significance After Mitigation

Less than significant.

G. CONCLUSION

The potential hazards related to site contamination and presence of landfill gas would be reduced to less-than-significant levels by implementation of the mitigation measures in this section and compliance with relevant State and federal regulations.