

3.11 HAZARDOUS WASTE/MATERIALS

3.11.1 Regulatory Setting

The primary federal laws regulating hazardous waste/materials are the Resource Conservation and Recovery Act of 1976 (RCRA) and the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA). The purpose of CERCLA, often referred to as Superfund, is to clean up contaminated sites so that public health and welfare are not compromised. RCRA provides for “cradle to grave” regulation of hazardous waste. Other federal laws include:

- Community Environmental Response Facilitation Act (CERFA) of 1992
- Clean Air Act
- Safe Drinking Water Act
- Occupational Safety & Health Act (OSHA)
- Atomic Energy Act
- Toxic Substances Control Act (TSCA)
- Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)

In addition to the acts listed above, EO 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.

Worker health and safety and public safety are key issues when dealing with hazardous materials that may affect human health and the environment. Proper disposal of hazardous materials is vital if such materials are encountered during project construction.

3.11.2 Affected Environment

The *Initial Site Assessment [ISA] – San Ysidro Border Station Expansion/Reconfiguration – San Diego, California* (September 11, 2008) evaluated potential hazardous waste/materials concerns within the Project vicinity. The ISA was prepared in accordance with the Caltrans ISA Guidance Document, the USEPA’s Standards and Practice for All Appropriate Inquiries (40 CFR, Part 312), and the ASTM Standard Practice for Environmental Site Assessments (Designation E1527-05) and consists of the following:

- Review of topographic and geologic maps and environmental reports
- Review of historical photographs, maps, plans, and directories
- Site reconnaissance
- Review of regulatory agency databases/files

The results of the ISA are summarized in this subchapter.

Study Area History

Historic land uses within the vicinity of the Project Study Area were identified through review of available historical aerial photographs on file with the County of San Diego Department of Public Works, GSA historical blueprints, and City of San Diego directories. The earliest available map dated back to 1928 and showed commercial development along a north-south trending road in the vicinity of what is presently I-5. The existing railroad corridor to the east was also present at that time. The Old Customs House was constructed between 1928 and 1949. By 1966, a border crossing with multiple lanes of traffic was developed, and the commercial buildings on the west side of the road were replaced with parking lots. By 1973, the crossing had developed generally into its current configuration, along with I-5, Camiones Way, and Camino de la Plaza.

Retail and commercial buildings, a former taxi maintenance facility that has since been removed (Red Cab Company facility), and the Greyhound building on the eastern portion of the Project Study Area were constructed between 1953 and 1966. Between 1928 and 1973, the western portion of the Project Study Area was used for agriculture and livestock before parking lots and the former commercial cargo vehicle inspection station were constructed. A gas station was located in the northeastern portion of the Project Study Area between 1962 and 1972, but has since been redeveloped with a commercial retail building (occupied by McDonalds and other retail stores) adjacent to the San Ysidro Intermodal Transportation Center.

Site Reconnaissance

Several site visits were conducted between April and June 2008 to access and observe portions of the Project Study Area that were considered likely to contain potential environmental concerns. Pertinent site observations summarized from the Project ISA are presented below in Table 3.11-1.

Location	Observations
East Mechanical Room (east side) on eastern portion of LPOE	5,000-gallon above ground storage tank (AST). No evidence of releases or staining was observed.
East Mechanical Room (roof) on eastern portion of LPOE	75 gallons of cooling tower chemicals (e.g., bleach, bromide solution). No staining was observed.
Old Customs House (paint storage room)	5-gallon containers of gasoline and diesel fuel. No evidence of releases was observed.
Old Customs House (northwest side)	Biohazardous waste storage in a portable shed and an incinerator. No evidence of releases was observed.
Location of former Red Cab facility	Staining was observed on asphalt and concrete pavement.
Vehicle Breakdown Area at LPOE	Storage of petroleum products (e.g., gasoline, diesel); hydraulic lift with above ground reservoir. No significant staining observed on concrete.
Duty-Free Shopping Plaza (south side of ancillary buildings)	Emergency generator with approximately 100 gallons of diesel fuel. No evidence of releases was observed.
Near former CBP Building on western portion of LPOE	Propane AST. Not considered a potential environmental concern.
Parking Lot on eastern portion of LPOE	Propane AST. Not considered a potential environmental concern.

Source: ISA, September 2008.

In addition to these facilities, several transformers and utility vaults are located within the Project Study Area. Some of these transformers may contain polychlorinated biphenyls (PCBs) in dielectric fluids, which constitutes a hazardous material. Three existing elevators at the LPOE (one in the Old Customs House, one in the Pedestrian Building, and one in the East Head House) also may contain PCBs in hydraulic fluids.

Surficial staining typical of leaking vehicle undercarriages was observed on asphalt and concrete pavement in areas throughout the Project Study Area. Additionally, retail quantities of paints and/or cleaning or maintenance products and scattered debris were observed in several locations within the Project Study Area.

Regulatory Agency File Review

Regulatory agency databases were reviewed to identify facilities of potential environmental concern located on or in the vicinity of the Project Study Area. Listed facilities are summarized below and their locations relative to the Project Study Area are illustrated in Figure 3.11-1.

San Ysidro LPOE

According to the County of San Diego Department of Environmental Health (DEH) records, a 10,000-gallon, single-walled diesel underground storage tank (UST) near the East Mechanical Room was removed in May 1996. The DEH UST closure report indicates that tank closure was complete and no further action was required. The UST was replaced with a 1,500-gallon AST containing amber fuel. The LPOE is currently permitted for disposal of universal waste and storage/use of diesel and paint. No violations related to unauthorized releases of hazardous materials or waste have been recorded.

Former Red Cab Facility

The site of the former Red Cab facility is located in the eastern portion of the Project Study Area, north of the Old Customs House. According to DEH files, the Red Cab Taxi Company leased this property from the Metropolitan Transit District as a maintenance and filling station from 1940 until 1994. It previously contained a single-story building, a 6,000-gallon gasoline UST with dispenser, and a waste oil storage area. An unauthorized release case is currently open in association with potential soil and groundwater contamination from the former UST and waste oil storage.

San Diego Police Southern Facility

This listed facility is located approximately 0.11 mile northwest of the Project Study Area at 663 East San Ysidro Boulevard. Records indicated that two unauthorized release cases were associated with this facility due to failed UST integrity tests. Two USTs were removed from this facility in November 1993. Soil samples collected from the tank excavation did not contain detectable concentrations of total petroleum hydrocarbons (TPH). In December 1993, the DEH indicated that no further action was required with respect to the tank closure. According to the 2008 DEH site assessment and mitigation (SAM) Case Listing, the two unauthorized release cases associated with failed tank integrity tests have been closed.

Goodwill Industries

This listed facility is located approximately 0.2 mile north of the Project Study Area at 626-630 Front Street. According to records (leaking underground storage tank (LUST) database and DEH SAM Case Listing), this facility has had one reported case due to potential soil contamination; however, the case is closed.

Las Americas Development

The Las Americas development is located approximately 0.15 mile northwest of the Project Study Area at 4211 Camino de la Plaza, and currently consists of the regional outlet shopping center. According to the 2008 DEH SAM Case Listing, this facility has one open case associated with a former waste oil UST.

San Diego and Imperial Valley Railroad

The San Diego and Imperial Valley (SDIV) Railroad facility is located approximately 0.42 mile northwest of the Project Study Area along the railroad corridor. A UST was removed from this facility in 1998, and soil samples indicated an unauthorized release of petroleum compounds. According to the case closure summary, less than 50 cubic yards of petroleum-impacted soil remains at this property, and no evidence of impacted groundwater was noted.

Coral Gates and Soil Disposal

This listed facility is located approximately 0.5 mile northwest of the Project Study Area near Camino de la Plaza and Sipes Lane. This facility has had one unauthorized release LUST case, which resulted in the presence of pesticides in soil and volatile organic compounds (VOCs) in groundwater. The case regarding impacts to groundwater from VOCs is considered to be closed.

Nelson and Sloan/Cays

This facility consists of an approximately 58-acre site west of the Project Study Area at the current location of the Las Americas shopping center. Based on the site's listing in the California Integrated Waste Management Board (CIWMB) Solid Waste Landfill-Related Sites database, this property was previously utilized as a solid waste disposal site. Solid waste issues associated with this facility included a sand borrow pit that was backfilled with undocumented fill material, burn ash from another location that was stockpiled in berms, and sandblast material that was placed on the ground. Soil samples collected from the burn ash berms indicated low levels of metals, but below regulatory thresholds. In 2001, the CIWMB issued a letter that the property had been clean-closed¹ and is not considered a solid waste disposal site.

According to the DEH LUST case closure summary, soil and groundwater sampling indicated low levels of VOCs (chlorinated solvents) in groundwater and no VOCs in soil vapor samples. The DEH issued closure in June 2001 prior to the site being developed with the Las Americas shopping center.

¹ Clean closure of a solid waste disposal site refers to the complete removal of all waste and waste residuals, including contaminated soils.

Aerially-Deposited Lead

Due to the Project location's proximity to the I-5 and I-805 freeways, soil within the Project Study Area may contain aerially-deposited lead (ADL) as a result of emissions from vehicular exhaust prior to the elimination of lead from fuels in the mid-1980s.

Hazardous Building Materials

Based on the construction dates of existing facilities and infrastructure, there is potential that asbestos-containing materials (ACMs) may be present in building materials in the Project Study Area. Lead-containing surfaces (LCSs) also may be present on building material surfaces of structures, and on other surfaces within the Project Study Area, such as roadway striping, metal guard rails, and piping.

3.11.3 Environmental Consequences

Preferred Alternative

Listed Facilities of Potential Environmental Concern

The regulatory agency reports were reviewed to evaluate whether the listed properties posed a potential environmental concern to the Project Study Area, based on their distance from the Project Study Area, the assumed direction of groundwater flow, the type of database on which they are listed, the nature of facility or waste generated, and/or their case status. Locations of the listed facilities are shown in Figure 3.11-1.

San Ysidro LPOE

While LPOE operations involve routine use, storage, and disposal of permitted hazardous substances (i.e., diesel, paint, and universal waste), no violations related to unauthorized releases of hazardous materials or waste have occurred. Therefore, no associated hazardous waste/materials impacts would occur.

Former Red Cab Facility

The former Red Cab facility is associated with an open unauthorized release case with DEH. Contaminated soil and/or groundwater potentially could be encountered during excavation activities associated with the Preferred Alternative.

San Diego Police Southern Facility

Given the distance of this facility from the Project Study Area (approximately 0.11 mile) and the closed status of the LUST cases, no hazardous waste/materials impacts would occur.

Goodwill Industries

Based on the distance of this listed facility from the Project Study Area (approximately 0.2 mile) and the closed case status, no hazardous waste/materials impacts would occur.

Las Americas Development

As discussed above, this facility has an open case associated with a former waste oil UST. A corrective action plan that was prepared in January 2008 indicates that the direction of groundwater flow is northwesterly, which is away from the Project Study Area. Based on the direction of groundwater flow and distance from the Project Study Area (approximately 0.15 mile), no hazardous waste/materials impacts would occur.

San Diego and Imperial Valley Railroad

Based on the distance of this listed facility from the Project Study Area (approximately 0.42 mile) and the closed case status, no hazardous waste/materials impacts would occur.

Coral Gates and Soil Disposal

Given the distance of this facility from the Project Study Area (approximately 0.5 mile) and the closed case status, no hazardous waste/materials impacts would occur.

Nelson and Sloan/Cays

No hazardous waste/materials impacts would occur upon implementation of the Preferred Alternative because the listed Nelson and Sloan/Cays facility has a closed case status, and was clean-closed as a solid waste disposal site prior to its redevelopment with the Las Americas shopping center.

Former Land Uses

Former land uses and facilities within the Project Study Area include boilers, fuel storage areas, a gas station, and agricultural uses. Potential environmental concerns associated with these former uses are briefly described below.

Historical blueprint records indicate a boiler room and “fuel room” were previously located within the Old Customs House, and a gas station was previously located in the northeastern portion of the Project Study Area, in the approximate location of the retail plaza at the San Ysidro Intermodal Transportation Center. Storage and use of fuels at these locations within the Project Study Area creates a potential environmental concern associated with unauthorized releases of fuels.

The western portion of the Project Study Area (at the location of the surface parking lots east of Virginia Avenue) was previously used for agricultural purposes, consisting of dry farming and livestock/equestrian operations. Given these prior agricultural uses, it is possible that pesticides, herbicides, and/or fertilizers were applied to soils and/or stored in this area. Storage and application of such substances causes a potential environmental concern associated with on-site soils.

Current Land Uses

Operations at the San Ysidro LPOE involve processing high volumes of vehicles, which generate urban contaminants, including fuels, oils, metals, grease, and other fluids. Specifically, the LPOE processes approximately 50,000 northbound vehicles per day

(SANDAG 2007). Given the large number of vehicles traveling through, or parked at, the LPOE, there is the potential that contaminants from vehicular sources have leached into underlying soils. As a result, contaminated soils could be encountered during excavation activities associated with the Preferred Alternative.

Aerially-Deposited Lead

As discussed above, exposed soil within the Project Study Area has the potential to contain ADL. Consequently, excavation activities during construction of the Preferred Alternative could encounter ADL.

Hazardous Building Materials

Records reviewed indicate that asbestos is present in the Old Customs House, and ACMs, LCS, and other hazardous building materials at the former commercial cargo inspection facility in the western portion of the Project Study Area. ACMs also may be present in existing bridge joints and piping material. In addition, LCSs may be present on surfaces of existing facilities within the Project Study Area, such as roadway striping, metal guard rails, piping, and bridge components. Implementation of the Preferred Alternative would remove some of these facilities, which could release associated hazardous materials.

Polychlorinated biphenyls

Pad-mounted and pole-mounted transformers and utility vaults are located in various areas in the Project Study Area. Some of these transformers may contain PCB dielectric fluids. Additionally, existing elevators at the LPOE may contain PCB hydraulic fluids. Implementation of the Preferred Alternative would demolish the elevators in the Pedestrian Building, East Head House, and ultimately the Old Customs House, and some existing transformers may be removed or relocated. Therefore, there is potential to encounter PCBs during construction of the Preferred Alternative.

Pedestrian Crossing Alternative

Although the Pedestrian Crossing Alternative would entail a different cross-border pedestrian circulation scheme, it would occur within the same Project Study Area as the Preferred Alternative. Therefore, the study area for hazardous waste/materials under the Pedestrian Crossing Alternative would be the same as the Preferred Alternative, and construction, operation, and maintenance activities would be similar. The analysis presented above for the Preferred Alternative would apply equally to the Pedestrian Crossing Alternative, and potential impacts with respect to hazardous waste/materials would be the same. Specifically, the Pedestrian Crossing Alternative would result in potential adverse impacts due to possible soil and/or groundwater contamination at listed facilities of potential environmental concern, and former and current uses within the Project Study Area and LPOE. Additionally, potential adverse impacts could occur associated with ADL, hazardous building materials, and PCBs.

No Build Alternative

The No Build Alternative would not result in grading or excavation of soils or the removal of buildings within the Project Study Area, thus there would be no potential to encounter hazardous materials.

3.11.4 Avoidance, Minimization, and/or Mitigation Measures

Preferred Alternative

The following avoidance, minimization, and mitigation measures would effectively avoid or address potential impacts related to hazardous waste/materials from the Preferred Alternative:

- Soil sampling should be conducted in areas within the Project Study Area proposed to be disturbed and/or excavated prior to soil export, reuse, or disposal to characterize the soil for the presence of hazardous materials (e.g., metals, petroleum hydrocarbons, VOCs, pesticides, etc.). If contaminated soil is present, appropriate abatement actions should be implemented in accordance with applicable regulatory requirements.
- Health risk assessments should be conducted for facilities within the LPOE in which contamination has been documented (e.g., former Red Cab facility) to evaluate whether the levels of contaminants would pose a risk to human health.
- Prior to commencement of excavation activities, a Site and Community Health and Safety Plan should be prepared to manage potential health and safety hazards to workers and the public.
- Prior to commencement of excavation activities, a Soil Management Plan should be prepared to address the notification, monitoring, sampling, testing, handling, storage, and disposal of contaminated media or substances that may be encountered during construction activities.
- Prior to commencement of excavation activities, a Groundwater Management Plan should be prepared to address the notification, monitoring, sampling, testing, handling, storage, and disposal of potentially contaminated groundwater.
- Existing transformers and elevator equipment within the Project Study Area should be sampled for PCB content if proposed to be disturbed and/or moved during construction activities. If PCBs are present, appropriate abatement actions for their disposal should be implemented in accordance with regulatory requirements, and soil beneath transformers and/or elevators should be evaluated for evidence of releases. If present in underlying soils, appropriate abatement actions for removal and disposal should be implemented in accordance with applicable regulatory requirements.
- Wastes and potentially hazardous waste on the Project site, including trash, debris piles, and equipment should be removed and disposed of off site in accordance with applicable regulatory requirements.
- Prior to renovation or demolition of existing structures, surveys should be conducted to evaluate the presence, locations, and quantities of hazardous building materials (ACMs and LCSs). Suspect materials should be sampled and analyzed, and if present, appropriate abatement actions should be implemented in accordance with applicable regulatory requirements.
- Contract specifications should include references to the potential to encounter contaminated soil, groundwater, or other regulated wastes during construction activities.

Pedestrian Crossing Alternative

Avoidance, minimization, and mitigation recommendations related to hazardous waste/materials issues for the Pedestrian Crossing Alternative would be the same as those described above for the Preferred Alternative. The use of such measures and considerations would avoid or effectively address all potential impacts related to hazardous waste/materials.

No Build Alternative

Because the No Build Alternative would not result in impacts, no avoidance, minimization, or mitigation measures would be required.

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