

1    **4.13    HAZARDOUS MATERIALS AND WASTE**

2    Factors considered in determining whether an impact would have a significant impact related  
3    to hazardous materials and wastes included the extent or degree to which an alternative would:

- 4        1. Create a hazard to the public or the environment through the routine transport, use, or  
5        disposal of hazardous materials, substances, or wastes; and
- 6        2. Create a hazard to the public or the environment through reasonably foreseeable upset  
7        and accident conditions involving the likely release of hazardous materials into the  
8        environment.

9    **4.13.1    Alternative 1**

10    Development of this alternative would result in a variety of residential, commercial, and  
11    recreation uses that, depending on the specific type of operation, could use hazardous materials  
12    or could generate hazardous wastes. Use and maintenance of residential landscaping might  
13    involve pesticides, fertilizers, and other household chemicals. Commercial land uses, such as  
14    activities associated with offices, film production, and retail and service industries, could  
15    require use of hazardous substances, such as fuels, solvents, corrosives, and flammables.  
16    Recreation uses likely would use pesticides and fertilizers in their operations.

17    *Significant and Mitigable Impacts*

18    Impact: Installation Restoration Program (IRP) (Factor 1). Construction activities at NSTI  
19    associated with future development of the housing unit area, including demolition of existing  
20    structures, may interfere with remedial actions under CERCLA.

21    *Mitigation.* The Navy is in the process of implementing various remedial actions at NSTI  
22    pursuant to and in accordance with the requirements of CERCLA and the NCP that will  
23    remove, manage, or isolate any potentially hazardous substances present on the property prior  
24    to conveyance. These remedial actions will ensure that human health and the environment will  
25    be protected based on the land uses specified in the Draft Reuse Plan. If the CERCLA remedy  
26    for a particular site includes land use controls, the acquiring entity or entities will be required to  
27    comply with the land use controls during construction or operations to ensure continued  
28    protection of human health and the environment. No CERCLA ROD has been signed for NSTI  
29    and therefore discussion of the specifics of possible land use controls would be premature.  
30    However, based on the approach used for closure of other nearby military installations, it is  
31    expected that land use controls would be managed according to a tiered process. The first tier  
32    would be a permitting process administered by San Francisco for disturbance of soil and  
33    groundwater. If necessary, a second tier would follow that would include further  
34    characterization and potentially a response action.

35    Subsequent redevelopment of the housing area which would involve demolition of existing  
36    structures and the grading and reconfiguring of the soil would likely be subject to land use  
37    controls on the property, including compliance with a City-administered soil management plan  
38    that would require soil and groundwater disturbance be permitted subject to proper  
39    characterization and management. In addition, deeds conveying the affected property will

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1 contain a notice that areas of the property not subject to remediation efforts (such as areas  
2 beneath existing foundations) may require additional characterization and possible response  
3 actions subject to appropriate regulatory oversight. Adherence to land use controls and  
4 regulatory requirements would mitigate potentially significant impacts to an acceptable level.

#### 5 *Not Significant Impacts*

#### 6 *Construction*

7 Asbestos Containing Material (ACM) (Factor 1). Demolition and/or renovation of existing  
8 structures would occur under Alternative 1. The exact number of structures to be demolished  
9 or renovated is not known. These activities have the potential to generate air emissions of  
10 asbestos from ACM. Any renovation or demolition would be subject to federal, state, and local  
11 requirements designed to minimize the potential for asbestos fiber releases and associated  
12 health risks. In order to be issued a permit to demolish or renovate (Cal. Health and Safety  
13 Code § 19827.5), the acquiring entity would be required to comply with applicable OSHA  
14 regulations and the Asbestos NESHAP, 40 C.F.R. Part 61, Subpart M (1998). The BAAQMD,  
15 which regulates airborne pollutants, would be notified 10 days prior to any demolition or  
16 abatement work. The acquiring entity would be required to employ a contractor trained and  
17 certified in the proper handling of ACM during demolition and renovation work. The  
18 acquiring entity also would be required to notify the local office of Cal OSHA prior to the start  
19 of work and would be required to register with the Office of the California Department of  
20 Health Services in Sacramento to obtain a Hazardous Waste Generation number. Adherence to  
21 these regulatory requirements would reduce potential impacts to a not significant level. No  
22 mitigation is proposed.

23 Lead Based Paint (LBP) (Factor 1). Demolition and/or renovation of existing structures would  
24 occur under Alternative 1. These activities have the potential to generate air emissions of lead-  
25 contaminated dust from LBP. LBP was in common use at NSTI and elsewhere prior to 1978. In  
26 accordance with DoD policy and the Residential Lead-based Paint Hazard Reduction Act of  
27 1992 (42 U.S.C. § 4851 et seq.), housing at NSTI constructed prior to 1978 will be inspected for  
28 LBP hazards. The 200 housing units on Treasure Island proposed for reuse under this  
29 alternative were constructed in 1989 and therefore would not be subject to inspection. Of the 90  
30 existing units on Yerba Buena Island proposed for residential reuse, 36 were constructed before  
31 1960 and 54 were constructed in 1966. The units constructed in 1966 would be subject to  
32 inspection, and the units constructed before 1960 would be subject to inspection and abatement.

33 Any LBP hazards discovered in housing constructed prior to 1960 will be abated before the  
34 housing is conveyed out of federal ownership, unless the transferee intends to demolish the  
35 housing and assumes responsibility for the proper handling of and disposal of LBP waste  
36 during demolition. Results of LBP surveys and lead warning statements will be included in any  
37 contract for transfer or lease, and the acquiring entity or entities will assume responsibility for  
38 properly managing LBP on buildings, in accordance with all applicable federal, state, and local  
39 laws and regulations. Adherence to these regulatory requirements would reduce potential  
40 impacts to a not significant level. No mitigation is proposed.

41 Polychlorinated Biphenyls (PCBs) (Factor 1). PCB-containing equipment and PCB release sites  
42 have been identified at NSTI. PCB surveys by Navy at NSTI are ongoing, and all PCB release

1 sites will be remediated prior to property conveyance. Navy will comply with the restrictions  
2 on the distribution of PCBs in commerce found in Section 6 of the TSCA (15 U.S.C. § 2605), and  
3 implementing EPA regulations, including the requirement that it disclose the existence of  
4 known PCB-containing electrical equipment at the time of lease, transfer, or conveyance. The  
5 acquiring entities would be required to comply with all applicable provisions of TSCA and  
6 other applicable laws and regulations designed to minimize the risks posed by PCBs. Any new  
7 releases of PCBs to the environment would be subject to the cleanup requirements of TSCA,  
8 CERCLA, and state law. Adherence to these regulatory requirements would reduce potential  
9 impacts to a not significant level. No mitigation is proposed.

10 Storage tanks (Factor 1). All current tanks will be closed per approved closure plans. No  
11 significant impacts to construction or operation would result. Reuse activities associated with  
12 this alternative might require removing ASTs or USTs. Reused and new tanks installed by the  
13 acquiring entities would be subject to all applicable federal, state, and local regulations,  
14 including San Francisco's tank operation and removal ordinance, Chapter 21 of the San  
15 Francisco Municipal Code. These regulations include acceptable leak detection methods, spill  
16 and overflow protection, cathodic protection, secondary containment for hazardous waste tank  
17 systems and piping, liability insurance, and removal regulations. Adherence to these  
18 regulatory requirements would reduce potential impacts to a not significant level. No  
19 mitigation is proposed.

20 Installation Restoration Program (IRP) (Factor 1). Construction activities at NSTI that may  
21 interfere with remediation would be subject to institutional controls identified in CERCLA  
22 RODs, including a Soil Management Plan. For any future project, the property owner must be  
23 informed of the past use so that remediation sites can be considered in the more detailed  
24 designs of future projects. Contractors would be informed of the past use and would be  
25 required to implement health and safety plans for work around remediation sites. Contractors  
26 would develop contingency plans to address contaminated soil and groundwater. If  
27 contaminated soil or groundwater is encountered, work could proceed following the applicable  
28 provisions of the contingency plan. Adherence to these institutional controls and regulatory  
29 requirements would reduce potential impacts to a not significant level. No mitigation is  
30 proposed.

### 31 *Operation*

32 Hazardous materials use and hazardous waste generation (Factors 1 and 2). Land use under  
33 Alternative 1 could use and generate small amounts of hazardous substances in commercial and  
34 recreation areas. The presence of these materials would create the potential for incidents of  
35 uncontrolled releases of hazardous materials to the environment through accidental spills,  
36 equipment failure, and other unanticipated events. However, no significant impacts related to  
37 hazardous materials use or hazardous waste generation are anticipated under Alternative 1  
38 because federal, state, and local laws require procedures and practices to ensure that hazardous  
39 materials are properly used, stored, and disposed of to prevent or minimize injury to human  
40 health and the environment.

41 Hazardous wastes generated by reuse operations would be handled and disposed of according  
42 to current regulatory guidelines. The acquiring entity and any tenants and business operators  
43 with which the acquiring entity establishes property usage agreements would be responsible for

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1 hazardous materials and waste management under federal, state, and local laws and  
2 regulations. Depending on the types and quantities of hazardous materials used, each  
3 acquiring entity would be subject to the requirements of the Emergency Planning and  
4 Community Right-to-Know Act (EPCRA) (42 U.S.C. § 11001 et seq.), the Resource Conservation  
5 and Recovery Act (RCRA) (42 U.S.C. § 6901 et seq.), and state hazardous materials business  
6 plans and risk management prevention programs for emergency planning review and  
7 community right-to-know inventory reporting. Adherence to these strict regulatory  
8 requirements would reduce potential impacts to a not significant level. No mitigation is  
9 proposed.

10 Radioactive materials (Factors 1 and 2). Under this alternative, small quantities of radioactive  
11 materials could be used for medical diagnosis and treatment in medical offices. Use and  
12 storage of such materials are tightly regulated under federal and state regulations. Adherence  
13 to these regulatory requirements would reduce potential impacts to a not significant level. No  
14 mitigation is proposed.

15 Medical/biohazardous wastes (Factors 1 and 2). Under this alternative, medical office tenants may  
16 produce small quantities of medical or biohazardous wastes. Handling, storing, and disposing  
17 of such wastes is strictly regulated by federal and state law, which also requires the  
18 establishment of medical or biohazardous material business plans and risk management  
19 prevention programs. Adherence to these regulatory requirements would reduce potential  
20 impacts to a not significant level. No mitigation is proposed.

21 Pesticides (Factors 1 and 2). Pesticide use may vary under this alternative but is expected to be  
22 minimal. All household and commercial use of pesticides would be controlled and regulated  
23 by the City Pesticide Management Program, Chapter 39 of the San Francisco Administrative  
24 Code, and applicable federal, state, and local regulations. Adherence to these regulatory  
25 requirements would reduce potential impacts to a not significant level. No mitigation is  
26 proposed.

#### 27 **4.13.2 Alternative 2**

28 The total built area under this alternative would be somewhat less than that for Alternative 1,  
29 and combined employee and resident populations would be about two-thirds less than  
30 Alternative 1. Overall hazardous materials use and hazardous waste generation would be  
31 lower for this alternative than for Alternative 1 due to the lesser amount of planned residential,  
32 commercial, and other uses that may require the use of hazardous materials and that may  
33 generate hazardous wastes.

#### 34 **Significant and Mitigable Impacts**

35 Impact: Installation Restoration Program (IRP) (Factor 1). Development of a golf course in the  
36 northern part of the island would involve demolition of existing structures and the grading and  
37 reconfiguring of the soil, which may interfere with remedial actions under CERCLA.

38 **Mitigation.** The Navy is in the process of implementing various remedial actions at NSTI  
39 pursuant to and in accordance with the requirements of CERCLA and the NCP that will  
40 remove, manage, or isolate any potentially hazardous substances present on the property prior

1 to conveyance. If a remedy for a particular site includes land use controls, the acquiring entity  
2 or entities will be required to comply with the land use controls during construction or  
3 operations to ensure continued protection of human health and the environment. Similar to  
4 Alternative 1, any work impacting the property under land use controls would comply with a  
5 City-administered soil management plan. Deeds conveying the affected areas will contain a  
6 notice that the property not subject to remediation efforts (such as areas beneath existing  
7 foundations) may require additional characterization and possible response actions subject to  
8 appropriate regulatory oversight. Therefore, compliance with all applicable federal, state, and  
9 local regulations in the handling and use of hazardous substances and adherence to land use  
10 controls would mitigate potentially significant impacts to an acceptable level.

#### 11 *Not Significant Impacts*

12 Pesticides (Factors 1 and 2). Creating a golf course instead of housing in the northern part of  
13 NSTI would increase pesticide use in that location, as compared to other alternatives. Pesticide  
14 use is controlled by federal, state, and local regulations, including the San Francisco Pest  
15 Management Program. Moreover, the City and County of San Francisco would develop and  
16 implement a pesticide, herbicide, and fertilizer management plan. For example, golf course  
17 design and operation could include BMPs for the storage, handling, and use of pesticides or  
18 fertilizers, including a chemical application and management plan. Golf course operation also  
19 could include integrated pest management to limit pesticide use. The use of BMPs and  
20 integrated pest management would be based on factors such as topography, proximity to water  
21 resources, mowing, and irrigation. BMPs would help to limit soil and water contamination  
22 from daily operations. Compliance with these regulations would minimize pesticide impacts to  
23 a not significant level, and no mitigation is proposed.

#### 24 4.13.3 Alternative 3

25 The construction and operational impacts under this alternative would be similar to, but less  
26 than, those identified for Alternative 1. The total built area and combined employee and  
27 resident populations would be about half that of Alternative 1. Because the existing facilities  
28 would be used and no new housing would be constructed, impacts associated with this  
29 alternative would be less extensive than those anticipated for Alternatives 1 and 2. Overall  
30 hazardous materials use and hazardous waste generation would be lower for this alternative  
31 than for Alternative 1 due to the lesser amount of planned residential and other uses that may  
32 require the use of hazardous materials and that may generate hazardous wastes.

#### 33 *Significant and Mitigable Impacts*

34 Impact: Installation Restoration Program (IRP) (Factor 1). If subsequent redevelopment of the  
35 housing area involving demolition of existing structures and the grading and reconfiguring of  
36 the soil were to occur, it may interfere with remedial actions conducted under CERCLA.

37 Mitigation. The Navy is in the process of implementing various remedial actions at NSTI  
38 pursuant to and in accordance with the requirements of CERCLA and the NCP that will  
39 remove, manage, or isolate any potentially hazardous substances present on the property prior  
40 to conveyance. If a remedy for a particular site includes land use controls, the acquiring entity  
41 or entities will be required to comply with the land use controls during construction or

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1 operations to ensure continued protection of human health and the environment. Similar to  
2 Alternatives 1 and 2, any work impacting the property under land use controls would comply  
3 with a City-administered soil management plan. Deeds conveying the affected areas will  
4 contain a notice that the property not subject to remediation efforts (such as areas beneath  
5 existing foundations) may require additional characterization and possible response actions  
6 subject to appropriate regulatory oversight. Therefore, compliance with all applicable federal,  
7 state, and local regulations in the handling and use of hazardous substances and adherence to  
8 land use controls would mitigate potentially significant impacts to an acceptable level.

#### **9 4.13.4 No Action Alternative**

10 Under the No Action Alternative, Navy would retain ownership of NSTI property. Except for  
11 the existing leases, which would be allowed to expire, buildings would be vacated. The  
12 property would be under caretaker status, the area fenced off, buildings would be sealed and  
13 decommissioned, and no new construction would occur. Ongoing remediation efforts would  
14 continue at all restoration sites, which would be cleaned to standards consistent with the  
15 current program requirements.

16 All remediation efforts would be conducted in compliance with federal, state, and local  
17 regulations. However, under this alternative, NSTI would not be transferred for reuse, and  
18 therefore cleanup efforts would not be accelerated pursuant to the President's fast-track cleanup  
19 directive. The scope and timing of investigations and cleanup would reflect the caretaker status  
20 of the property and would proceed in accordance with the IRP. However, cleanup may slow  
21 without the possibility of reuse.

22 ACM left in existing buildings would not be impacted under caretaker status. Normal  
23 maintenance operation in buildings would not release ACM.

24 The No Action Alternative would have no impact to hazardous materials and environmental  
25 contamination on NSTI. Maintenance would be undertaken so that human health and the  
26 environment would be protected.